

PREA Facility Audit Report: Final

Name of Facility: Missoula County Juvenile Detention Facility

Facility Type: Juvenile

Date Interim Report Submitted: NA

Date Final Report Submitted: 07/13/2026

Auditor Certification

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.



I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.



Auditor Full Name as Signed: Karen d. Murray

Date of Signature: 07/13/2026

AUDITOR INFORMATION

Auditor name: Murray, Karen

Email: kdmconsults1@gmail.com

Start Date of On-Site Audit: 06/23/2026

End Date of On-Site Audit: 06/24/2026

FACILITY INFORMATION

Facility name: Missoula County Juvenile Detention Facility

Facility physical address: 2340 Mullan Road, Missoula, Montana - 59808

Facility mailing address:

Primary Contact

Name:	April Ramert
Email Address:	aramert@missoulacounty.us
Telephone Number:	406-258-4016

Superintendent/Director/Administrator	
Name:	Sheryl Ziegler Commander
Email Address:	sziegler@missoulacounty.us
Telephone Number:	4062584047

Facility PREA Compliance Manager	
Name:	
Email Address:	
Telephone Number:	

Facility Health Service Administrator On-Site	
Name:	Deb Weatherwax
Email Address:	dweatherwax@missoulacounty.us
Telephone Number:	(406) 258-4063

Facility Characteristics	
Designed facility capacity:	24
Current population of facility:	15
Average daily population for the past 12 months:	13
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Both women/girls and men/boys

Age range of population:	10-17
Facility security levels/resident custody levels:	minimum to maximum
Number of staff currently employed at the facility who may have contact with residents:	120
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	28
Number of volunteers who have contact with residents, currently authorized to enter the facility:	18

AGENCY INFORMATION	
Name of agency:	Missoula County Sheriff's Department
Governing authority or parent agency (if applicable):	
Physical Address:	2340 Mullan Road, Missoula, Montana - 59808
Mailing Address:	2340 Mullan Road, Missoula, - 59808
Telephone number:	4062584000

Agency Chief Executive Officer Information:	
Name:	Sheriff Jeremiah Petersen
Email Address:	jpetersen@missoulacounty.us
Telephone Number:	1-406-258-3303

Agency-Wide PREA Coordinator Information			
Name:	April Ramert	Email Address:	aramert@missoulacounty.us

Facility AUDIT FINDINGS

Summary of Audit Findings

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:

8

- 115.311 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
- 115.317 - Hiring and promotion decisions
- 115.331 - Employee training
- 115.335 - Specialized training: Medical and mental health care
- 115.342 - Placement of residents
- 115.361 - Staff and agency reporting duties
- 115.368 - Post-allegation protective custody
- 115.383 - Ongoing medical and mental health care for sexual abuse victims and abusers

Number of standards met:

35

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

Please note: Question numbers may not appear sequentially as some questions are omitted from the report and used solely for internal reporting purposes.

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2026-06-23
2. End date of the onsite portion of the audit:	2026-06-24

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	☒ Yes ☐ No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	YWCA - Victim Advocates PREA@missoulacounty.us - Agency Third Party Option

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	24
15. Average daily population for the past 12 months:	12
16. Number of inmate/resident/detainee housing units:	3
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	☐ Yes ☒ No ☐ Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit

Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit

23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	9
25. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
26. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	0
27. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
28. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
29. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0
30. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	0

31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	0
33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	0
34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	No text provided.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	9
37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	2

38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	14
39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	9
41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	☐ Age ☐ Race ☐ Ethnicity (e.g., Hispanic, Non-Hispanic) ☐ Length of time in the facility ☒ Housing assignment ☒ Gender ☐ Other ☐ None
42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	Due to the population being nine during the onsite review, all youth were interviewed.
43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	☐ Yes ☒ No

a. Explain why it was not possible to conduct the minimum number of random inmate/resident/detainee interviews:	There were only nine youth in the facility during the onsite review.
44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	0
As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".	
47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.

b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	All youth residing at the facility were interviewed. No youth meeting a targeted category were residing at the facility during the onsite review.
48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	All youth residing at the facility were interviewed. No youth meeting a targeted category were residing at the facility during the onsite review.
49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	All youth residing at the facility were interviewed. No youth meeting a targeted category were residing at the facility during the onsite review.
50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	All youth residing at the facility were interviewed. No youth meeting a targeted category were residing at the facility during the onsite review.
51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	All youth residing at the facility were interviewed. No youth meeting a targeted category were residing at the facility during the onsite review.
52. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	All youth residing at the facility were interviewed. No youth meeting a targeted category were residing at the facility during the onsite review.
53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	All youth residing at the facility were interviewed. No youth meeting a targeted category were residing at the facility during the onsite review.
54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	All youth residing at the facility were interviewed. No youth meeting a targeted category were residing at the facility during the onsite review.
55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	All youth residing at the facility were interviewed. No youth meeting a targeted category were residing at the facility during the onsite review.
56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	All youth residing at the facility were interviewed. No youth meeting a targeted category were residing at the facility during the onsite review.

57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
58. Enter the total number of RANDOM STAFF who were interviewed:	6
59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	☐ Length of tenure in the facility ☒ Shift assignment ☒ Work assignment ☒ Rank (or equivalent) ☐ Other (e.g., gender, race, ethnicity, languages spoken) ☐ None
60. Were you able to conduct the minimum number of RANDOM STAFF interviews?	☐ Yes ☒ No

a. Select the reason(s) why you were unable to conduct the minimum number of RANDOM STAFF interviews: (select all that apply)	☐ Too many staff declined to participate in interviews. ☒ Not enough staff employed by the facility to meet the minimum number of random staff interviews (Note: select this option if there were not enough staff employed by the facility or not enough staff employed by the facility to interview for both random and specialized staff roles). ☐ Not enough staff available in the facility during the onsite portion of the audit to meet the minimum number of random staff interviews. ☐ Other
61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	All staff on both shifts were interviewed during the onsite review.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	11
63. Were you able to interview the Agency Head?	☒ Yes ☐ No
64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	☒ Yes ☐ No

65. Were you able to interview the PREA Coordinator?	☒ Yes ☐ No
66. Were you able to interview the PREA Compliance Manager?	☐ Yes ☐ No ☒ NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

67. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)

- ☐ Agency contract administrator
- ☒ Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment
- ☐ Line staff who supervise youthful inmates (if applicable)
- ☐ Education and program staff who work with youthful inmates (if applicable)
- ☐ Medical staff
- ☐ Mental health staff
- ☐ Non-medical staff involved in cross-gender strip or visual searches
- ☒ Administrative (human resources) staff
- ☐ Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff
- ☒ Investigative staff responsible for conducting administrative investigations
- ☒ Investigative staff responsible for conducting criminal investigations
- ☒ Staff who perform screening for risk of victimization and abusiveness
- ☐ Staff who supervise inmates in segregated housing/residents in isolation
- ☒ Staff on the sexual abuse incident review team
- ☒ Designated staff member charged with monitoring retaliation
- ☒ First responders, both security and non-security staff
- ☒ Intake staff

	☐ Other
68. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	☒ Yes ☐ No
a. Enter the total number of VOLUNTEERS who were interviewed:	2
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	☐ Education/programming ☐ Medical/dental ☐ Mental health/counseling ☒ Religious ☐ Other
69. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	☒ Yes ☐ No
a. Enter the total number of CONTRACTORS who were interviewed:	2
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	☐ Security/detention ☐ Education/programming ☒ Medical/dental ☐ Food service ☐ Maintenance/construction ☐ Other
70. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.

71. Did you have access to all areas of the facility?

☒ Yes

☐ No

Was the site review an active, inquiring process that included the following:

72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?

☒ Yes

☐ No

73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?

☒ Yes

☐ No

74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?

☐ Yes

☒ No

75. Informal conversations with staff during the site review (encouraged, not required)?

☐ Yes

☒ No

76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	All youth and staff were formally interviewed during the onsite review.
Documentation Sampling	
Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.	
77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	☒ Yes ☐ No
78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	No text provided.
SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY	
Sexual Abuse and Sexual Harassment Allegations and Investigations Overview	
Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.	

79. Total number of SEXUAL ABUSE allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	0	0	0

80. Total number of SEXUAL HARASSMENT allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	3	0	3	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	3	0	3	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

Note: these counts should reflect where the investigation is currently (i.e., if a criminal investigation was referred for prosecution and resulted in a conviction, that investigation outcome should only appear in the count for “convicted.”) Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual abuse investigation files, as applicable to the facility type being audited.

81. Criminal SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual abuse	0	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0	0
Total	0	0	0	0	0

82. Administrative SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	0	0	0

Sexual Harassment Investigation Outcomes

Note: these counts should reflect where the investigation is currently. Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual harassment investigation files, as applicable to the facility type being audited.

83. Criminal SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual harassment	0	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0	0
Total	0	0	0	0	0

84. Administrative SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	3	0	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	3	0	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

85. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:

0

a. Explain why you were unable to review any sexual abuse investigation files:

The facility has not received an allegation of sexual abuse in the past 12 months.

86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	3
94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	3
96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	☒ Yes ☐ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

Staff-on-inmate sexual harassment investigation files

98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	No text provided.

SUPPORT STAFF INFORMATION**DOJ-certified PREA Auditors Support Staff**

102. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	☐ Yes ☒ No
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Non-certified Support Staff

103. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.

☐ Yes

☒ No

AUDITING ARRANGEMENTS AND COMPENSATION

108. Who paid you to conduct this audit?

☒ The audited facility or its parent agency

☐ My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)

☐ A third-party auditing entity (e.g., accreditation body, consulting firm)

☐ Other

Standards
Auditor Overall Determination Definitions
- Exceeds Standard (Substantially exceeds requirement of standard) - Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) - Does Not Meet Standard (requires corrective actions)
Auditor Discussion Instructions
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.

115.311	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: - Missoula County Juvenile Detention Facility PAQ - Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 - Missoula County Detention Facility Administrative Chain of Command, not dated Interviews: - Random Youth - Targeted Youth - Detention Officers

4. Unit Manager
5. PREA Coordinator
6. Jail Commander
7. Under Sheriff

Interviews with youth demonstrated each reported feeling sexually safe within the facility. Youth consistently stated searches are conducted respectfully by staff and further demonstrated they were offered mental health services regardless of the outcome of their risk assessment.

Interviews with staff demonstrated youth housing assignments are based on overall safety and compatibility, not solely PREA considerations, to reduce conflict and promote a safe living environment. Staff consistently stated parents and appropriate court officials are notified within 24 hours of a reported allegation. Employees further demonstrated a strong understanding of professional boundaries, emphasizing youth are treated fairly and consistently, without favoritism or special treatment. Staff stated any knowledge, suspicion, or information regarding sexual abuse or sexual harassment is immediately reported, professional boundaries are maintained by remaining focused on the youth and following established policies, and concerns regarding inappropriate behavior are addressed immediately and reported through the chain of command if the behavior continues.

The interview with the PREA Coordinator demonstrated she utilizes the agency's New World database and a color-coded standards spreadsheet to oversee PREA systems within each department responsible for PREA-related functions. She further demonstrated she reviews a daily victim/aggressor report to ensure appropriate housing assignments are maintained utilizing Housing Flow Charts posted in each Unit Control Room. Additionally, she stated supervisory staff, and Unit Managers are immediately notified by email whenever a housing unit room change occurs to ensure all appropriate personnel are aware of the change.

Site Observations:

During the tour of the facility, the Auditor observed PREA Zero-Tolerance postings containing internal and external reporting information for youth, as well as external victim advocate information, displayed throughout the facility. PREA Audit Notices were also observed in both English and Spanish in multiple locations, ensuring youth had continual access to PREA reporting and educational information.

(a) Missoula County Juvenile Detention Facility PAQ states the agency policy

mandates zero-tolerance toward all forms of sexual abuse and sexual harassment in the facility it operates and those directly under contract. The facility has a policy outlining how it will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment.

Missoula County Detention Center PREA Policy and Procedure – Juvenile Facility, page 3, section Policy, states, “The Missoula County Detention Facility has a zero-tolerance policy against all forms of sexual abuse and sexual harassment. MCDF prohibits all sexual activity between or with any youth(s) under our care and supervision. No staff may work at the facility before completing PREA training. Personnel are exempt from completing prior PREA training when responding to an emergency.”

(b) Missoula County Juvenile Detention Facility PAQ states the agency employs or designates an upper-level, agency-wide PREA Coordinator. The PREA Coordinator has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities. The position of the PREA Coordinator in the agency's organizational structure.

Missoula County Detention Center PREA Policy and Procedure – Juvenile Facility, page 3, section 115.311 PREA Coordinator, Procedure, states, “The PREA Coordinator will ensure a zero-tolerance philosophy throughout the entire organization to prevent, detect, and respond to sexual abuse and sexual harassment in the facility.”

The facility provided a Missoula County Detention Facility Administrative Chain of Command. The organizational chart demonstrates the PREA Coordinator reports directly to the Administrative Commander who reports directly to the Undersheriff.

(c) Missoula County Juvenile Detention Facility PAQ states this provision is not applicable as the facility does not have a PREA Manager.

Based on documentation review, interviews, and site observations, the facility exceeds compliance with this standard. The PREA Coordinator demonstrated a comprehensive oversight system utilizing electronic tracking, color-coded compliance monitoring, daily victim/aggressor reviews, automated supervisory notifications of housing changes, and operational housing flow charts to ensure ongoing compliance. Collectively, youth and staff interviews demonstrated a strong culture of safety, professionalism, and immediate reporting, while observations

	confirmed PREA reporting information and victim advocacy resources were prominently displayed throughout the facility in two languages. These practices demonstrate an agency-wide commitment to preventing, detecting, and responding to sexual abuse beyond the minimum requirements of the standard.
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115.312	Contracting with other entities for the confinement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: - Missoula County Juvenile Detention Facility PAQ Interviews: - Jail Commander The interview with the Jail Commander demonstrated the agency does not contract with other agencies or facilities for the confinement of its inmates. (a) The Missoula County Juvenile Detention Facility PAQ states agency has not entered into or renewed a contract for the confinement of inmates Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.313	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: - Missoula County Juvenile Detention Facility PAQ - Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023

3. Annual Review of Staffing Assignment and Video Monitoring, dated December 2025
4. Missoula County Juvenile Detention Staffing Discrepancy Log, dated 6.5.2022 – 3.10.2026
5. Missoula County Detention Juvenile Facility Officer Activity Log (Unannounced Rounds), dated throughout 1.24.2025 – 4.26.2026

Interviews:

1. Detention Officers
2. Corporal
3. PREA Coordinator
4. Jail Commander

Interviews with Detention Officers demonstrated supervisory rounds are documented in New World, the agency's jail management system.

The interview with the Corporal demonstrated he conducts unannounced rounds at varying times, once per day per shift, and documents each round in the New World jail management system. He further stated unannounced rounds include observing youth behavior, interacting with youth, and reviewing video footage, including audio capabilities, throughout the facility.

The interview with the PREA Coordinator demonstrated unannounced rounds are documented within the New World jail management system. During the interview, she accessed the system and demonstrated documented supervisory rounds from previous months.

The interview with the Jail Commander demonstrated Missoula County completed a staffing analysis through a third-party reviewer and subsequently added full-time positions to improve staffing coverage. She further demonstrated annual schedules are developed to account for planned leave and established staffing ratios are maintained to address unplanned absences. Additionally, the staffing plan is reviewed quarterly, with evaluations of camera coverage, audio testing, and overall staffing practices to ensure continued compliance.

Site Observations:

Review of unannounced rounds documentation demonstrated supervisory rounds are consistently documented within the New World jail management system. Documentation further demonstrated rounds are completed and recorded once per day per shift by supervisory personnel.

(a) The Missoula County Juvenile Detention Facility PAQ states the agency requires each facility it operates to develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect residents against abuse. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents is 13. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents on which the staffing plan was predicated is 24.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 5, section 115.313 Supervision and Monitoring, Policy, states, “MCDF will protect youth against sexual abuse and sexual harassment by limiting the possibility that youth and staff will be left alone and unmonitored through adequate and ongoing supervision. MCDF will ensure that the facility shall develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and where applicable, video monitoring, to protect youth against sexual abuse.

The PREA Coordinator, along with the Facility Administration, will conduct an annual assessment to determine if staffing patterns, video monitoring systems, other technologies and resources are adequate to ensure the protection of youth against sexual abuse and sexual harassment by limiting the possibility that youth and staff will be left alone and unmonitored through adequate and ongoing supervision. “

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 5-6, section 115.313 Supervision and Monitoring, Procedure, states, “MCDF will maintain a staffing plan that provides for adequate levels of staffing to ensure for the protection of each youth against sexual abuse and sexual harassment. When with a youth, staff is to remain in an area that can be observed by another staff member directly or through video monitoring system. In situations where additional staffing is needed, the Supervisor will be notified, and additional staff will be made available. MCDF maintains a staffing ratio of 1:8 during waking hours and 1:12 during sleeping hours.

MCDF shall comply with the staffing plan except during limited discrete exigent

circumstances and shall fully document deviations from the plan during such circumstances.

When MCDF is calculating the appropriate staffing levels and determining the need for video monitoring, the following items shall be taken into consideration:

- (1) Generally accepted detention and correctional practices;
- (2) Any judicial findings of inadequacy;
- (3) Any findings of inadequacy from Federal investigative agencies;
- (4) Any findings of inadequacy from internal or external oversight bodies;
- (5) All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated);
- (6) The composition of the inmate population;
- (7) The number and placement of supervisory staff;
- (8) Facility programs occurring on a particular shift;
- (9) Any applicable State or local laws, regulations, or standards;
- (10) The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and
- (11) Any other relevant factors."

The facility provided an Annual Review of Staffing Assignment and Video Monitoring. The staffing plan includes the following information.

1. Generally accepted adult correctional practices
 - a. Montana Jail Standards
 - b. Youth Administrative Rules of Montana
2. Any judicial findings of inadequacy
3. Any findings of inadequacy from federal investigative bodies
4. Any findings of inadequacy from internal or external oversight bodies (i.e.- Continuous Quality Improvement (CQI) process, Quality Assurance (QA) audits.
5. All components of the program's physical plant (including "blind spots" or areas where staff or residents may be isolated): (Annual reviews from 2019 - 2025)

- a. Camera updates for the past years of 2019 – 2023.
 - 6. The composition of the resident population (i.e.-gender ratios, risk/need of residents, physical size, Sexual Aggressive Behavior (SAB), Vulnerability to Victimization (VV).
 - 7. The number and placement of supervisory staff
 - a. Adult Detention
 - i. Shift Staffing
 - ii. Transport
 - iii. Dayshift Staff
 - iv. Unit Managers
 - b. Juvenile Detention
 - i. Shift Staffing
 - c. Facility Administration
 - d. Deviation from the Staffing Plan
 - 8. Programs occurring on a particular shift
 - a. Adult
 - b. Juvenile
 - 9. Any applicable State or local laws, regulations, or standards
 - 10. The prevalence of substantiated and unsubstantiated incidents of sexual abuse
 - 11. Any other relevant factors
 - a. Juvenile Facility Housing Assignments
 - i. Unit 6 - Pods A-D
- (b) The Missoula County Juvenile Detention Facility PAQ states each time the staffing plan is not complied with, the facility documents and justifies all deviations from the staffing plan.
- Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 6, section 115.313 Supervision and Monitoring, section (b), states, “In circumstances where the staffing plan is not complied with, MCDF will document

and justify all deviates from the plan.”

The facility provided a Missoula County Juvenile Detention Staffing Discrepancy Log. This log documents the following:

- Date
- Time – From/To
- Violation Type: Gender/Ratio
- Staff Deviation Reason Code
- Attempt(s) to Rectify – Number Codes

(c) The Missoula County Juvenile Detention Facility PAQ states the facility is obligated by law, regulation, or judicial consent decree to maintain staffing ratios of a minimum of 1:8 during resident waking hours and 1:16 during resident sleeping hours. The facility maintains staff ratios of a minimum of 1:8 during resident waking hours. The facility maintains staff ratios of a minimum of 1:12 during resident sleeping hours. In the past 12 months, the number of times the facility deviated from the staffing ratios of 1:8 security staff during resident waking hours was three. In the past 12 months, the number of times the facility deviated from the staffing ratios of 1:16 during resident sleeping hours was four.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 5, section Procedure, states, “MCDF will maintain a staffing plan that provides for adequate levels of staffing to ensure for the protection of each youth against sexual abuse and sexual harassment. When with a youth, staff is to remain in an area that can be observed by another staff member directly or through video monitoring system. In situations where additional staffing is needed, the Supervisor will be notified, and additional staff will be made available. MCDF maintains a staffing ratio of 1:8 during waking hours and 1:12 during sleeping hours.”

(d) The Missoula County Juvenile Detention Facility PAQ states at least once every year the agency or facility, in collaboration with the agency's PREA Coordinator, reviews the staffing plan to see whether adjustments are needed to: (a) the staffing plan; (b) prevailing staffing patterns; (c) the deployment of monitoring technology; or (d) the allocation of agency or facility resources to commit to the staffing plan to ensure compliance with the staffing plan.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 6, section 115.313 Supervision and Monitoring, section (c), states, “Whenever necessary, but not less frequently than once each year, in consultation with the PREA Coordinator required by 115.11, MCDF will assess, determine, and document whether adjustments are needed to:

1. The staffing plan established.
2. The facility’s deployment of video monitoring systems and other monitoring technologies;
3. The resources the facility has available to commit to ensure adherence to the staffing plan.”

(e) The Missoula County Juvenile Detention Facility PAQ states The facility requires that intermediate-level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 6-7, section 115.313 Supervision and Monitoring, section (d), states, “MCDF has implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Such policy and practice shall be implemented for night shifts as well as day shifts. MCDF will have a policy to prohibit staff from alerting other staff members that these supervisory rounds are occurring unless such announcement is related to the legitimate operational functions of the facility.

1. Unannounced rounds will be conducted by a supervisor (or designee) at least once per week per shift.
2. All rounds will be random and unannounced.
3. Unannounced rounds will be completed on all shifts.
4. Unannounced rounds shall be completed in each housing unit and program/ common areas.
5. Staff are prohibited from alerting other staff members that the supervisory rounds are occurring, unless such an announcement is related to the legitimate operational functions of the facility.
6. Documentation of these rounds will be maintained in the JMS Correction Officer log.
7. Documentation/findings of these rounds will be sent quarterly to the PREA Coordinator.

	The facility provided Missoula County Detention Facility Officer Activity Log (Unannounced Rounds). The log documents the following information. · Date/Time · Activity (supervisor unannounced rounds) · Pod/Block · Officer ID · Entered Time · Entry User · Remarks Unannounced rounds are documented once every one to four days during each shift, at alternating times throughout the facility on the Officer Activity Log. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.315	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 3. Cross-gender pat-down search video 4. Missoula County Detention Facility Acknowledgment of Employee PREA Training, dated 6.6.2022 Interviews:

1. Random Youth
2. Targeted Youth
3. Detention Officers

Interviews with youth demonstrated each stated searches are conducted by same-gender staff and are always completed professionally. Youth were able to articulate they change clothing in the shower area to ensure privacy while in a state of undress. Youth further stated staff of both genders announce their presence when entering the housing pods.

Interviews with Detention Officers demonstrated searches are conducted by same-gender staff unless a transgender, intersex, or gender non-conforming youth requests to be searched by a staff member of the gender with which they identify. Staff further stated searches are conducted under camera surveillance and any cross-gender searches would be documented. Employees consistently emphasized the importance of remaining professional, treating every youth with dignity and respect, and throughout the search process.

Site Observations:

During the tour of the facility, the Auditor observed the intake area, which included a staff workstation, two holding rooms, a clothing room, and a staff restroom. One holding room contained a shower and toilet, while the second contained a toilet positioned behind a half wall to provide privacy. Youth are pat searched under camera surveillance, and staff verbalize each step of the search process before proceeding with intake.

During the tour, the Auditor also observed the youth housing pods. Each pod contains a shower located behind a three-quarter wall and outside the camera's direct line of sight. The Unit Manager demonstrated all youth are secured in their rooms during shower periods to maximize privacy while showering.

(a) The Missoula County Juvenile Detention Facility PAQ states the facility does not conduct cross-gender strip or cross-gender visual body cavity searches of their Residents. In the past 12 months the facility has conducted zero cross-gender strip or cross-gender visual body cavity searches of residents.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 7, section Policy, states, “MCDF prohibits cross-gender strip, except in exigent circumstances. If required, the cross-gender strip search will be conducted by a

trained staff member with a same gender witness in the room.

MCDF prohibits cross-gender pat down searches except in exigent circumstances. MCDF will document and justify all cross-gender pat-down searches.

MCDF prohibits staff of the opposite sex to view youth showering, changing clothes or performing bodily functions except when such view is incidental during routine cell (bed) checks.

MCDF will not search or physically examine a transgender or intersex youth for the sole purpose of determining the youth's genital status.

MCDF will train security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex residents, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs."

(b) Missoula County Juvenile Detention Facility PAQ states the facility does not permit cross-gender pat-down searches of female residents, absent exigent circumstances. The number of pat-down searches of female residents that were conducted by male staff has been zero.. Policy compliance can be found in provision (a) of this standard.

(c) Missoula County Juvenile Detention Facility PAQ states the facility policy requires that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches be documented and justified.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 7, section Procedure, first paragraph, states, "If required in exigent circumstances, when a cross-gender strip search is conducted, it will be done by a trained staff member, with a same gender witness. It will be conducted in a private setting and documented in the youth's medical file. MCDF will not conduct visual body cavity searches. If a warrant is obtained for the search, it will be completed by a medical professional.

When staff are entering opposite sex housing units, they will announce their

	presence each time they enter the unit. If a youth's genital status is unknown, it may be determined during conversations with the youth, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner. MCDF will train staff on cross gender searches during their PREA training and document completion. Staff will be required to watch the Cross-Gender and Transgender Pat Searches Video from the PREA Resource Center and will be provided a handout to refer to." (d) Missoula County Juvenile Detention Facility PAQ states the facility has implemented policies and procedures that enable Residents to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera). Policies and procedures require staff of the opposite gender to announce their presence when entering a resident housing unit/areas where residents are likely to be showering, performing bodily functions, or changing clothing. Policy compliance can be found in provision (c) of this standard. The PAQ states, "NO cross-gender viewing has occurred in the facility; thus, no log exists." (e) The Missoula County Juvenile Detention Facility PAQ states the facility has a policy prohibiting staff from searching or physically examining a transgender or intersex Resident for the sole purpose of determining the resident's genital status. Such searches did not occur in the past 12 months. Policy compliance can be found in provision (c) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.316	Residents with disabilities and residents who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

1. Missoula County Juvenile Detention Facility PAQ
2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023
3. Missoula County Sheriff Sexual Assault and Staff Sexual Misconduct Brochure, not dated
4. Language Line Services Agreement, dated 4.18.2022

Interviews:

1. Detention Officer

There were no targeted youth residing at the facility during the onsite review.

The interview with the Detention Officer demonstrated she ensures youth understand PREA information by confirming each can read and write, reading information aloud when necessary, and asking clarifying questions to verify comprehension. She further stated youth who are limited English proficient or hard of hearing are provided appropriate language and interpretation services to ensure meaningful access to PREA information.

(a) The Missoula County Juvenile Detention Facility PAQ states the agency has established procedures to provide disabled Residents equal opportunities to be provided with and learn about the agency's efforts to prevent, detect and respond to sexual abuse and sexual harassment.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 8, section 115.316, section Policy (a), states, "MCDF will take appropriate steps to ensure that youth with disabilities (including, for example, youth who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the program's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

(a) When necessary to ensure effective communication with youth who are deaf or hard of hearing, MCDF will provide access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any

necessary specialized vocabulary. In addition, MCDF shall ensure that written materials are provided in formats or through methods that ensure effective communication with youth with disabilities, including youth who have intellectual disabilities, limited reading skills, or who are blind or have low vision.

Note: A program is not required to take actions that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title II of the Americans with Disabilities Act, 28 CFR 35.164.”

(b) The Missoula County Juvenile Detention Facility PAQ states the agency has established procedures to provide residents with limited English equal opportunity to participate in or benefit from all aspects of the agency’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 8, section 115.316, section Policy, (b), states, “MCDF will take reasonable steps to ensure meaningful access to all aspects of the program’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment to youth who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.”

The facility provided a Missoula County Sheriff Sexual Assault and Staff Sexual Misconduct Brochure. The brochure includes the following topics:

- You have the right to serve your sentence with dignity
- What is sexual assault
- Examples of sexual assault
- How to prevent sexual assault

What to do if you’ve been sexually assaulted – to include reporting option information

The facility provided a Language Line Services Agreement. The agreement appears to be current with no apparent expiration date.

	(c) The Missoula County Juvenile Detention Facility PAQ states the agency policy prohibits use of resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.364, or the investigation of the resident's allegations. In the past 12 months, the number of instances where resident interpreters, readers, or other types of resident assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the resident's safety, the performance of first-response duties under §115.364, or the investigation of the resident's allegations was zero. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 8, section 115.316, section Policy, (c), states, “MCDF will not rely on youth interpreters, youth readers, or other types of youth assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the youth's safety, the performance of first-response duties under § 115.364, or the investigation of the youth's allegations.” Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 8, section 115.316, section Procedure, states, “MCDF contracts with Language Line Solutions for translation services to youth who are not English proficient. The PREA video will have closed capturing options for deaf youth and an American Sign Language translator will be available as need through Language Line Solutions. MCDF will utilize mental health and/or special education staff for youth with cognitive or intellectual delays. MCDF will not rely on youth interpreters, youth readers, or other types of youth assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the youth's safety, the performance of first-response duties, or the investigation of the youth's allegations. “ Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.317	Hiring and promotion decisions
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review:

1. Missoula County Juvenile Detention Facility PAQ
2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023
3. Missoula County Sheriff’s Department Detention Policy and Procedure Manual, Policy No: 3-30, dated 4.22.2022

Interviews:

1. Jail Commander

Interviews with the Jail Commander demonstrated child abuse registry checks are completed upon hire and criminal background checks, and administrative adjudication questions are completed during the pre-employment background investigation process, during promotions, and again every three years during the first year of each audit cycle. She further demonstrated the agency has an affirmative duty process in place, and both the agency conducts and responds to institutional reference checks for applicable current and former employees.

Site Observation:

By utilizing the PREA Audit – Juvenile Facilities Documentation Review Employee File/ Records template, eleven employee files reviewed demonstrated each had criminal background and child registry checks upon hire and again within five years. The facility was able to demonstrate administrative adjudication questions had been asked during the hiring and promotion processes and institutional references were completed on all applicable applicants or past employees.

(a) The Missoula County Juvenile Detention Facility PAQ states the Agency policy prohibits hiring or promoting anyone who may have contact with residents, and prohibits enlisting the services of any contractor who may have contact with residents, who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997); • Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or • Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 10, section Procedure, states, “MCDF will complete a thorough background check on all new employees prior to hire. The background will include the Disclosure

of PREA employment Standards Violation form which is a self-disclosure for prior misconduct of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse. MCDF will consult applicable child abuse registries and consider any incidents of sexual harassment in determining whether to hire or promote anyone. MCDF will perform a criminal background check for new hires, promotions, and every five years on current employees. MCDF will make its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. MCDF will provide information of substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 9, section Policy (a) 1-3, states, “Prevent staff sexual misconduct by ensuring that individuals who have a prior history of being sexually abusive are not hired or contracted into positions where they may have contact with youth.

(a) MCDF will not hire or promote anyone who may have contact with youth, and shall not enlist the services of any contractor who may have contact with youth, who—

(1) Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997);

(2) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or

(3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.”

(b) The Missoula County Juvenile Detention Facility PAQ states agency policy requires the consideration of any incidents of sexual harassment when determining to hire and or promote anyone, or to enlist services of any contractor, who may have contact with youth.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 9, section Policy (b), states, “MCDF will consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with youth.”

(c) The Missoula County Juvenile Detention Facility PAQ states agency policy requires that before it hires any new employees who may have contact with residents, it (a) conducts criminal background record checks; (b) consults any child abuse registry maintained by the State or locality in which the employee would work; and (c) consistent with Federal, State, and local law, makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. In the past 12 months, the number of persons hired who may have contact with residents who have had criminal background record checks was one.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 9, section Policy (c) 1-3, states, “Before hiring new employees who may have contact with youth, MCDF will:

(1) Perform a criminal background record check;

(2) Consult any child abuse registry maintained by the State or locality in which the employee would work; and

(3) Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.”

(d) The Missoula County Juvenile Detention Facility PAQ states the agency policy requires that a criminal background records check be completed, and applicable child abuse registries consulted before enlisting the services of any contractor who may have contact with residents. In the past 12 months, the number of contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with residents is two.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 9, section Policy (d), states, “MCDF will also perform a criminal background records check, and consult applicable child abuse registries, before enlisting the services of any contractor who may have contact with youth.”

(e) The Missoula County Juvenile Detention Facility PAQ states the agency policy requires that either criminal background records checks be conducted at least every five years of current employees and contractors who may have contact with residents or that a system is in place for otherwise capturing such information for current employees.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 9, section Policy (e), states, “MCDF will either conduct criminal background records check at least every five years of current employees and contractors who may have contact with youth or have in place a system for otherwise capturing such information for current employees.”

(f) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 9, section Policy (f), states, “MCDF will also ask all applicants and employees who may have contact with youth directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. MCDF will also impose upon employees a continuing affirmative duty to disclose any such misconduct.”

(g) The Missoula County Juvenile Detention Facility PAQ states that agency policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 9, section Policy (g), states, “Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.”

(h) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 10, section Policy (h), states, “Unless prohibited by law, MCDF will provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.”

Based on documentation review, interviews, and site observations, the facility exceeds compliance with this standard. The agency has implemented a comprehensive personnel screening and retention process that extends beyond the minimum requirements of the standard through the routine completion of criminal background checks upon hire, child abuse registry checks, administrative

	adjudication questions during hiring and promotions, institutional reference checks, and an affirmative duty process requiring employees to disclose misconduct. Additionally, the agency conducts recurring criminal background checks every three years, exceeding the minimum five-year requirement. Documentation review confirmed these practices are consistently implemented and maintained, demonstrating the agency's ongoing commitment to preventing individuals with a history of sexual misconduct from having contact with youth.
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115.318	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 Interviews: 1. Jail Commander 2. Under Sheriff The interview with the Jail Commander demonstrated no modifications have been made to the facility since the previous PREA audit; however, the agency has allocated funding for camera replacements and recently purchased a new server to support the camera system. The interview with the Undersheriff demonstrated the Missoula County Sheriff's Office is involved early in the planning of any substantial modifications to the facility. He further stated the Jail Commander meets with facilities and maintenance staff to develop plans that address the safety and security needs of the facility. The Undersheriff also stated the agency continually looks for opportunities to expand video monitoring to enhance security and assist in preventing sexual abuse and sexual harassment. Site Observations: During the tour, multiple cameras were observed throughout the facility. Camera

	views were reviewed in the Control Booth and all cameras were found to be operational. Cameras provide coverage of each youth room while toilet areas are electronically blurred to protect privacy. Youth are instructed to change clothing in the shower area, which is located behind a three-quarter door and also electronically blurred on camera. (a) The Missoula County Juvenile Detention Facility PAQ states the facility has not acquired a new facility or made substantial expansions or modifications to existing facilities since the last PREA audit. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 10, section, 115.318- Upgrades to facility and technology, Policy, states, “Agencies will take sexual safety into consideration when making decisions about upgrades to facilities and technologies, the acquisition of new facilities, and during the process of designing any new facility or expansion of an existing facility. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 10, section, 115.318- Upgrades to facility and technology, Procedure, states, “MCDF will consider sexual safety when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology to protect residents from sexual abuse.” (b) The Missoula County Juvenile Detention Facility PAQ states the agency or facility has installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.321	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ

2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023
3. Memorandum of Understanding between Missoula County Detention Center and First Step Resource Center at Providence St. Patrick Hospital, dated 8.19.2025
4. Memorandum of Understanding between Missoula County Detention Center and the YWCA, dated 8.19.2025

Interviews:

1. Mental Health Coordinator – Contractor
2. Detective Lieutenant / Investigator

Interviews with medical and mental health practitioners demonstrated victims of sexual abuse requiring a forensic medical examination are transported to Third Way for services.

The interview with the Investigator demonstrated he and his team conduct all administrative and criminal investigations involving allegations of sexual abuse and sexual harassment involving inmates, as well as adult and juvenile personnel. He further demonstrated investigations are initiated upon notification from the Missoula Police Department, Patrol Division, or the Jail Commander.

Site Observations:

During the past 12 months, the facility reported zero allegations of sexual abuse requiring either a forensic medical examination or an investigative interview.

(a) The Missoula County Juvenile Detention Facility PAQ states the agency/facility is responsible for conducting administrative sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct). The agency/facility is not responsible for conducting criminal sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct). Criminal Investigations are conducted by Missoula County Sheriff's Office. When conducting a sexual abuse investigation, the agency investigators follow a uniform evidence protocol. The PAQ states, "Criminal investigations are conducted by the Missoula County Sheriff's Office"

Facility, page 11, section 115.321- Evidence protocol and forensic medical examinations, section Policy (a), states, “The site PREA Coordinator will establish a written Memorandum of Understanding (MOU) with a medical facility that has Sexual Assault Forensic Examiners (SAFE) or Sexual Assault Nurse Examiners (SANE) personnel and with a Rape Crisis Center. MCDF programs will refer victims of sexual abuse to an agency that follows evidence protocols for forensic medical examinations.

(a) To the extent MCDF is responsible for investigating allegations of sexual abuse, MCDF will follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.”

(b) The Missoula County Juvenile Detention Facility PAQ states the protocol being developmentally is appropriate for youth. The protocol was adapted from or otherwise based on the most recent edition of the DOJ’s Office on Violence Against Women publication, “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” or similarly comprehensive and authoritative protocols developed after 2011.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 11, section 115.321- Evidence protocol and forensic medical examinations, section Policy (b), states, “The protocol to be used is the “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents.”

(c) The Missoula County Juvenile Detention Facility PAQ states the facility offers all residents who experience sexual abuse access to forensic medical examinations. Forensic examinations are offered at no cost to the victim. Where possible, all examinations are conducted by SAFE or SANE examiners. There have been zero medical exams, SAFE/SANE exams performed in the last 12 months. The PAQ states, “Youth would be transported to First Step Resource Center for a forensic medical examination by a SANE/SAFE.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 11, section 115.321- Evidence protocol and forensic medical examinations, section Policy (c), states, “MCDF will offer all youth who experience sexual abuse access to forensic medical examinations whether on-site or at an outside program, without financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot

be made available, the examination can be performed by other qualified medical practitioners informed on the protocols listed above. MCDF will document its efforts to provide SAFEs or SANEs medical practitioners and place in the youth's medical file."

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 12, section 115.321- Evidence protocol and forensic medical examinations, section Procedure, states, "MCDF will maintain a Memorandum of Understanding (MOU) with First Step Resource Center at 900 N Orange Street, Missoula, MT 59802 to provide examinations performed by Sexual Assault Forensic Examiners (SAFE) and Sexual Assault Nurse Examiners (SANE). Youth will be transported to First Step by staff for forensic medical examinations without financial cost. If SAFEs and SANEs medical practitioners cannot be made available, the examination will be performed at Saint Patrick Hospital with other qualified medical practitioners informed on protocols. MCDF will document its efforts to provide SAFEs or SANEs medical practitioners and place it in the youth's medical file.

MCDF will maintain a Memorandum of Understanding (MOU) with the YWCA at 1800 S 3rd Street West, Missoula, MT 59801, to make available to the victim, a victim advocate from a rape crisis center. The rape crisis center is available 24/7 by calling 1-800-483-7858. If a crime victim advocate is not available through the rape crisis center, MCDF will refer to the PREA Compliance Coordinator and document efforts to secure services from rape crisis centers. The PREA Compliance Coordinator will be required to successfully complete the NIC PREA: Behavioral Health Care for Sexual Assault Victims in a Confinement Setting training and training records will be kept in the employee PREA file with Human Resource."

The facility provided a Memorandum of Understanding between Missoula County Detention Center and First Step Resource Center at Providence St. Patrick Hospital. The memorandum appears to be current with no obvious expiration date and is signed by the Jail Commander and the First Step Clinical Supervisor.

(d) The Missoula County Juvenile Detention Facility PAQ states the facility attempts to make a victim advocate from a rape crisis center available to the victim, in person or by other means. All efforts are documented. If a rape crisis center is not available to provide victim advocate services. The facility does employ qualified staff member to accompany victims.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 11, section 115.321- Evidence protocol and forensic medical examinations,

section Policy (d), states, "MCDF will attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, MCDF shall make available to provide these services a qualified staff member from a community-based organization or a qualified agency staff member. MCDF shall document efforts to secure services from rape crisis centers. For the purpose of this standard, a rape crisis center refers to an entity that provides intervention and related assistance, such as the services specified in 42 U.S.C. 14043g(b)(2)(C), to victims of sexual assault of all ages. MCDF may utilize a rape crisis center that is part of a governmental unit as long as the center is not part of the criminal justice system (such as a law enforcement program) and offers a comparable level of confidentiality as a nongovernmental entity that provides similar victim services."

The facility provided a Memorandum of Understanding between Missoula County Detention Center and the YWCA. The MOU appears to be current with no stated expiration date. The MOU is signed by the Missoula County Juvenile Detention Center Jail Commander and the YMCA Director of Programs.

(e) The Missoula County Juvenile Detention Facility PAQ states if requested by the victim, a victim advocate, or qualified agency staff member, or qualified community-based organization staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information, and referrals.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 11, section 115.321- Evidence protocol and forensic medical examinations, section Policy (e), states, "As requested by the victim, the victim advocate, qualified staff member, or qualified community-based organization staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals."

(f, g) The Missoula County Juvenile Detention Facility PAQ states if the agency is not responsible for investigating administrative or criminal allegations of sexual abuse and relies on another agency to conduct these investigations, the agency has requested that the responsible agency follow the requirements of paragraphs §115.321 (a) through (e) of the standards. The PAQ states, "Criminal investigations are conducted by the Missoula County Sheriff's Office. There is no MOU on file as MCJDK is part of that agency."

	Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 11-12, section 115.321- Evidence protocol and forensic medical examinations, section Policy (f-g), state, f. “To the extent MCDF itself is not responsible for investigating allegations of sexual abuse, MCDF will request that the investigating program follow the requirements of paragraphs (a) through (e) of this section. g. The requirements of paragraphs (a) through (f) of this section shall also apply to: (1) Any State entity outside of the program that is responsible for investigating allegations of sexual abuse in prisons or jails; and (2) Any Department of Justice component that is responsible for investigating allegations of sexual abuse in juvenile facilities.” (h) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 12, section 115.321- Evidence protocol and forensic medical examinations, section, Policy (h), states, “For the purposes of this standard, a qualified staff member or a qualified community- based staff member shall be an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual assault and forensic examination issues in general.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.322	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 Interviews: 1. PREA Coordinator

2. Under Sheriff

The interview with the PREA Coordinator demonstrated allegations of sexual harassment and sexual abuse are referred for investigation by the PREA Coordinator, Jail Commander, Assistant Commander, Lieutenant, Captain, or Chief, regardless of the source of the allegation.

The interview with the Undersheriff demonstrated all allegations are reviewed and referred for investigation based on the circumstances reported. Administrative and/or criminal investigations are conducted for all allegations of sexual abuse and sexual harassment. In some instances, a referral is made to the agency with jurisdiction where the alleged incident occurred. If an allegation involves the Missoula County Sheriff's Office, the investigation is referred to an outside law enforcement agency. The Undersheriff stated the agency ensures its partner agencies maintain policies governing the investigation of sexual abuse and sexual harassment allegations. When an allegation involves potential criminal conduct, a Deputy responds and conducts the criminal investigation. If probable cause exists, the case is referred to the County Attorney for prosecution. Allegations determined to be non-criminal in nature are referred to administrative investigators within the Detention Facility to determine whether administrative sanctions, policy revisions, or procedural changes are warranted to enhance inmate safety.

Site Observations:

During the past 12 months, the facility completed two sexual harassment administrative investigations. Documentation demonstrated each allegation of sexual harassment was referred for investigation within five days of receipt.

(a) The Missoula County Juvenile Detention Facility PAQ states the agency insures that an administrative or criminal investigations are completed for all allegations of sexual abuse and sexual harassment. In the past 12 months the facility has had seven allegations of sexual abuse and sexual harassment that were received. In the past 12 months, the number of allegations resulting in an administrative investigation was three. The PAQ states, "Four of the allegations were Non-PREA issues. Only informational reports were done on those."

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 13, section 115.322- Policies to ensure referrals or allegations for investigations, section Procedure, states, "MCDF will ensure that all reports of sexual abuse and sexual harassment are investigated. The determination of whether an allegation involves potentially criminal behavior will be made by the PREA Compliance Coordinator. Sexual harassment violations will be investigated by

administrative staff who have completed the PREA: Investigating Sexual Abuse in a Confinement Setting training.

Criminal investigations of Sexual Abuse will be completed by the Missoula County Sheriff's Office. Administrative staff will reach out for updates on the investigation and document. The victim will have the right to know the outcome of the investigation and can request a copy of the report from the sheriff's office."

Missoula County Detention Facility PREA Policy and Procedure - Juvenile Facility, page 12, section 115.322- Policies to ensure referrals or allegations for investigations, section Policy (a), states, "MCDF will ensure that an administrative investigation is completed for all allegations of sexual abuse and sexual harassment.

a) MCDF will ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment."

(b-c) The Missoula County Juvenile Detention Facility PAQ states the agency has a policy that requires allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, including the agency if it conducts its own investigations, unless the allegation does not involve potentially criminal behavior. The agency's policy regarding the referral of allegations of sexual abuse or sexual harassment for a criminal investigation is published on the agency website or made publicly available via other means. The facility has published their investigation policy on their website at <http://www.missoulacounty.us/government/public-safety/detention-facility>

Missoula County Detention Facility PREA Policy and Procedure - Juvenile Facility, page 12, section 115.322- Policies to ensure referrals or allegations for investigations, section (b-c), state,

b) "MCDF will have in place a policy to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. MCDF will publish such policy on its website and document all referrals.

c) The Missoula County Sheriff's Office is responsible for conducting criminal investigations, such publication will describe the responsibilities of both MCDF and the investigating entity."

	(d) This standard is not applicable as the facility completes Administrative Investigations and the Missoula Sheriff's Office is responsible for conducting Criminal Investigations. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.331	Employee training
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 3. Employee Training PowerPoint, not dated 4. Missoula County Detention Facility, Acknowledgement of Employee PREA Training, dated 8.2024 Interviews: 1. Detention Officers Interviews with Detention Officers demonstrated each received annual PREA refresher training through policy review, training videos, and in-person instruction provided by the PREA Coordinator. Staff consistently demonstrated a thorough understanding of prevention strategies, including conducting unannounced rounds, making cross-gender announcements, maintaining constant supervision, recognizing signs of abuse, mandatory reporting requirements, first responder responsibilities, professional boundaries, and appropriate search procedures. Staff emphasized the importance of remaining vigilant by keeping their "eyes on and ears on," treating every report seriously, and immediately reporting any knowledge, suspicion, or information related to sexual abuse or sexual harassment. Several staff stated they remain professional and consistent with every youth, explaining, "We don't play favorites," and "Do the right thing at the right time for the right reason."

Site Observations:

By utilizing the PREA Audit – Juvenile Facilities Documentation Review Employee File/ Records template of five personnel files demonstrated each had received initial and annual refresher training within the past two years.

(a) The Missoula County Juvenile Detention Facility PAQ states the agency trains all employees who may have contact with Residents in all required provisions of this standard. PAQ states, “Staff will be required to watch Cross-Gender and Transgender Pat Searches <https://vimeo.com/183649668>

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 14, section Procedure, states, “MCDF will provide PREA training to all new employees within 6 months of hire. Employees will be required to provide a signature or electronic verification that they understand the training they have received. Documentation will be kept in employee files. All MCDF employees will receive an annual refresher training to ensure that staff can prevent, detect, and respond to sexual abuse and sexual harassment and to create a culture of sexual safety in the facility.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 13-14, section Policy (a) 1-13, states, “To ensure that staff can prevent, detect, and respond to sexual abuse and sexual harassment and to create a culture of sexual safety in the facility by educating all employees on:

1. Its zero-tolerance policy for sexual abuse and sexual harassment;
2. How to fulfill their responsibilities under program sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
3. Youths’ right to be free from sexual abuse and sexual harassment;
4. The right of youth and staff to be free from retaliation for reporting sexual abuse and sexual harassment;
5. The dynamics of sexual abuse and sexual harassment in juvenile facilities;
6. The common reactions of juvenile victims of sexual abuse and sexual harassment;
7. How to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between youth;
8. How to avoid inappropriate relationships with youth;

9. How to communicate effectively and professionally with youth, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming youth; and
10. How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities;
11. Relevant laws regarding the applicable age of consent.
12. There is no age of consent for juveniles in confinement.”

The facility provided the following training Employee PowerPoint presentations: National PREA Resource Center, Unit 1: The Prison Rape Elimination Act: Overview of the Law and Your Role PowerPoint. This curriculum includes the following:

- Unit 1: The Prison Rape Elimination Act: Overview of the Law and Your Role
- Unit 2: Inmates’ Rights to be Free from Sexual Abuse and Sexual Harassment and Staff and Inmate Rights to be Free from Retaliation for Reporting
- Unit 3 Part I: Prevention and Detection
- Unit 3 Part II: Response and Reporting
- Unit 4: Professional Boundaries
- Unit 5: Effective and Professional Communication

National PREA Resource Center, Unit 2: The Prison Rape Elimination Act: Inmates’ Rights to be Free from Sexual Abuse and Sexual Harassment and Staff and Inmates’ Rights to be Free from Retaliation for Reporting PowerPoint. This curriculum includes the following:

- Understand agency policy and PREA requirements related to inmates’ right to be free from sexual abuse and sexual harassment
- Understand agency policy and PREA requirements related to staff and inmates’ right to be free from retaliation for reporting
- Discuss the role of retaliation in contributing to a code of silence

National PREA Resource Center, Unit 3: The Prison Rape Elimination Act: Prevention and Detection of Sexual Abuse and Sexual Harassment PowerPoint. This training curriculum includes the following:

- Understand the dynamics of sexual abuse and sexual harassment in confinement settings

- Learn how to detect signs of threatened and actual sexual abuse by understanding common reactions of victims of sexual abuse and sexual harassment and common behaviors of abusers
- Apply learning objectives 1 and 2 to fulfill your responsibility under agency sexual abuse and sexual harassment prevention and detection policies and procedures

National PREA Resource Center, Unit 4: The Prison Rape Elimination Act: Professional Boundaries PowerPoint. This training curriculum includes the following:

- Reasons why relationships may occur in confinement settings between staff and inmates
- Identify inappropriate behaviors

National PREA Resource Center, Unit 5: The Prison Rape Elimination Act: Effective and Professional Communication with Inmates PowerPoint. This training curriculum includes the following:

- Define appropriate terminology to use when communicating with the Lesbian, Gay, Bi-Sexual, Transgender and Intersex (LGBTI) population
- Conduct professional communication with inmates, including LGBTI inmates
- Review and understand any relevant agency policy specific to LGBTI inmates

(b) The Missoula County Juvenile Detention Facility PAQ states training is tailored to the unique needs and attributes and gender of residents at the facility.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 14, section Policy, (b) paragraph, states, “Such training shall be tailored to the unique needs and attributes of youth in the facility and to the gender of the youth in the facility. The staff shall receive additional training if the staff is reassigned from a program that houses only male youth to a program that houses only female youth, or vice versa.”

(c) The Missoula County Juvenile Detention Facility PAQ states between trainings the agency provides employees who may have contact with residents with refresher information about current policies regarding sexual abuse and sexual harassment. The frequency with which employees who may have contact with residents receive refresher training on PREA requirements, every two years.

	Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 14, section Policy, (c) paragraph, states, “MCDF will provide each employee with refresher training every two years to ensure that all employees know MCDF’s current sexual abuse and sexual harassment policies and procedures. In years in which an employee does not receive refresher training, MCDF shall provide refresher information on current sexual abuse and sexual harassment policies.” (d) The Missoula County Juvenile Detention Facility PAQ states the agency documents that employees who may have contact with residents, understand the training they have received through employee signature or electronic verification. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 14, section Policy, (d) paragraph, states, “MCDF will document, through attendance sheet which must include staff signature or electronic verification that staff understand the training they have received. Documentation will be kept in employee files.” The facility provided a Missoula County Detention Facility, Acknowledgement of Employee PREA Training. Employees affirm receipt and understanding of training through this acknowledgement. Based on documentation review, interviews, and site observations, the facility exceeds compliance with this standard. The agency provides a comprehensive PREA training program utilizing National PREA Resource Center curriculum, annual refresher training, policy review, training videos, and instructor-led discussions conducted by the PREA Coordinator. Staff interviews consistently demonstrated not only a thorough knowledge of PREA requirements, but an operational understanding of how those requirements are applied in daily practice through vigilant supervision, immediate reporting, professional boundaries, and youth-centered interactions. Staff consistently emphasized maintaining professionalism, treating every youth fairly, and responding to concerns immediately, demonstrating a culture of accountability and sexual safety that extends beyond the minimum requirements of the standard.
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115.332	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

1. Missoula County Juvenile Detention Facility PAQ
2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023
3. Missoula County Detention Facility Prison Rape Elimination Act Training for Interns, Volunteers, and Contractors, dated 4.8.2025
4. Missoula County Detention Facility PREA Brochure for Interns, Volunteers, and Contractors, not dated

Interviews:

1. Mental Health Coordinator - Contractor
2. Health Services Administrator – Contractor
3. Parenting Place – Volunteer
4. Bible Study - Volunteer

Interviews with contractors and volunteers demonstrated each received PREA training prior to being granted access to inmates and annually thereafter. Each further demonstrated awareness of the agency's zero-tolerance policy and stated they would immediately report any knowledge, suspicion, or information regarding sexual harassment or sexual abuse to security staff.

Site Observations:

Through utilization of the PREA Audit – Adult Prisons & Jails Documentation Review Employee File / Records Review template, review of two contractor and two volunteer personnel files demonstrated each had received initial PREA training prior to resident contact and annual refresher PREA training during the past two years.

(a) The Missoula County Juvenile Detention Facility PAQ states all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and harassment prevention, detection, and response. "The number of volunteers and contractors, who have contact with residents, who have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response is 46."

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 15, section 115.332- Volunteer and contractor training, Procedure, states, “MCDF will require all volunteers and contractors complete a “Read and Sign” explaining the facilities zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents. Documentation will be filed on site and volunteers and contractors will receive a copy of the PREA Brochure for Interns, Volunteers, and Contractors to take with them. PREA Compliance Coordinator will be available to answer questions regarding the zero-tolerance policy. “

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 14, section 115.332- Volunteer and contractor training, Policy (a), states, “All volunteers and contractors who have contact with youth will be trained on their responsibilities under MCDF’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

(a) The level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with youth, but all volunteers and contractors who have contact with youth shall be notified of the agency’s zero- tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.”

The facility provided a Prison Rape Elimination Act Training for Interns, Volunteers, and Contractors. This curriculum includes the following:

Mission Statement

Overview

- Purpose
- What are the primary objectives of the Prison Rape Elimination Act (PREA)?
- What are the procedures for reporting incidents and/or allegations of prison rape?
- Reporting Incidents/Allegations

PREA Information

- o Descriptions
- o Sexual Abuse
- o Sexual Harassment
- o How to Report

	· Training Affidavit to include volunteer and or contractor printed name, date, signature and work location. The facility provided a Missoula County Detention Facility PREA Brochure for Interns, Volunteers, and Contractors. This brochure includes the following: - o Purpose - o What is PREA - o How to Report - o Definitions - o Did you know? - o Mission Statement (b) The Missoula County Juvenile Detention Facility PAQ states the level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with residents. All volunteers and contractors who have contact with residents have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 15, section 115.332- Volunteer and contractor training, Policy (b), states, "MCDF will maintain documentation confirming that volunteers and contractors understand the training they have received." (c) The Missoula County Juvenile Detention Facility PAQ states the agency maintains documentation confirming that the volunteers and contractors understand the training they have received. Procedure compliance can be found in provision (a) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.333	Resident education
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Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Missoula County Juvenile Detention Facility PAQ
2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023
3. Zero Tolerance for Sexual Abuse and Sexual Harassment Posting, not dated
4. Missoula County Detention Facility Inmate Information and Rule Book, dated 2022
5. Missoula County Detention Facility Acknowledgment of Youth Education, dated 7.2022

Interviews:

1. Random Youth
2. Targeted Youth
3. Detention Officer / Intake staff

Interviews with youth demonstrated each received PREA education during the booking process through a video presentation and staff explanation of PREA information. Youth consistently demonstrated an understanding they could report sexual harassment or sexual abuse to any staff member, through the PREA hotline, by submitting a grievance or kite, through their families, or to medical and mental health staff. Youth further articulated the facility's zero-tolerance policy and their right to be free from sexual harassment and sexual abuse, with several stating they felt comfortable reporting concerns because staff would listen and take reports seriously.

Site Observations:

Utilization of the PREA Audit – Juvenile Facilities Documentation Review – Resident Files / Records Review template demonstrated eight of the nine youth reviewed had been admitted within the previous 12 months. Documentation demonstrated all eight youth received PREA education on the day of admission.

- (a) The Missoula County Juvenile Detention Facility PAQ states residents receive information at time of intake about the zero-tolerance policy and how to report

incidents or suspicions of sexual abuse or sexual harassment. The number of residents admitted in past 12 months who were given this information at intake was 225.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 15-16, section Procedure, states, “MCDF will provide youth the Sexual Assault and Staff Sexual Misconduct brochure at intake which will explain the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. Within 10 days of intake, youth will be required to watch the PREA: What You Need to Know video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents. During the orientation process, staff will answer questions from youth and review how to report sexual assault.

MCDF will ensure information is readily available or visible to youth through posters, brochures, and the inmate handbook. Posters will be visible in each unit and the visiting area. Each youth will also receive a copy of the inmate handbook which will provide reporting information. There will be a Spanish version posted with the English version. PREA video will be closed captioned and available in Spanish. If a youth speaks a language other than English or Spanish, staff will utilize the Language Line for translation. Language Line will also provide America Sign Language translation as needed. For youth who have limited reading skills, staff will review the brochure and reporting information 1:1 to ensure the youth understands the information.”

(b) The Missoula County Juvenile Detention Facility PAQ states the number of those residents admitted in the past 12 months who received comprehensive age-appropriate education on their rights to be free from sexual abuse and sexual harassment, from retaliation for reporting such incidents, and on agency policies and procedures for responding to such incidents within 10 days of intake was 225.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 14, section Policy (a), states, “Youth shall receive information to prevent sexual abuse and sexual harassment and to encourage reporting by teaching youth about their right to be free from sexual abuse and sexual harassment, educating them about the ways they can report it, and making sure they understand what will happen if there is an incident of sexual abuse or sexual harassment, including what services are available to victims. Youth education can build their trust in staff and the facility’s commitment to safety, which may increase reporting and ultimately deter sexual abuse and sexual harassment.

(a) During the intake process, youth shall receive information explaining, in an

age-appropriate fashion, the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment."

(c) The Missoula County Juvenile Detention Facility PAQ states of those who were not educated during 30 days of intake, all residents have been educated subsequently. All juveniles have been trained. Agency policy requires that residents who are transferred from one facility to another be educated regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents to the extent that the policies and procedures of the new facility differ from those of the previous facility.

Missoula County Detention Facility PREA Policy and Procedure - Juvenile Facility, page 15, section Policy (b), states, "Within 10 days of intake MCDF shall provide comprehensive age-appropriate education to youth either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding MCDF's policies and procedures for responding to such incidents."

(d) The Missoula County Juvenile Detention Facility PAQ states Resident PREA education is available in accessible formats for all residents including those who are limited English proficient, deaf, visually impaired, otherwise disabled or have limited reading skills.

Missoula County Detention Facility PREA Policy and Procedure - Juvenile Facility, page 15, section Policy (c), states, "MCDF will provide youth education in formats accessible to all youth, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to youth who have limited reading skills."

(e) The Missoula County Juvenile Detention Facility PAQ states the facility maintains documentation of resident participation in PREA education sessions.

Missoula County Detention Facility PREA Policy and Procedure - Juvenile Facility, page 15, section Policy (d), states, "MCDF will maintain documentation of youth participation in these education sessions in the youth file."

The facility provided a Missoula County Detention Facility Acknowledgment of Inmate Education. This acknowledgment documents the following:

- I have received a copy of the Sexual Assault and Staff Sexual Misconduct brochure.
- I understand the zero-tolerance policy regarding sexual abuse, sexual misconduct, and sexual harassment.
- I received information on how to report directly to MCDF or to the PREA hotline AND how to contact a rape crisis center advocate.
- I understand my right to be free of retaliation for reporting. I had the opportunity to ask questions, and any questions were answered to my full understanding.

The acknowledgment requires the inmate printed name, signature, date and staff witness name and date. If the inmate refuses to sign a second staff name and date is required.

(f) The Missoula County Juvenile Detention Facility PAQ states the agency ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, resident handbooks, or other written formats.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 15, section Policy (e), states, “In addition to providing such education, MCDF shall ensure that key information is continuously and readily available or visible to youth through posters, youth handbooks, or other written formats.”

The facility provided a Missoula County Detention Facility Inmate Information and Rule Book. Page 15, section 510. Prison Rape Elimination Act (PREA), states, “Established in 2003 with a final rule in 2012, PREA is a federal law established to address the elimination and prevention of sexual assault and sexual harassment within correctional and detention facilities. MCDF maintains a zero-tolerance policy for all sexual activity between or with any inmate(s) under our care and supervision. This includes inmate-on-inmate, and any of the following acts, with or without consent of the inmate by a staff member, contractor, or volunteer.” The handbook also includes definitions, rights, reporting information to include the PREA Hotline, verbally reporting to staff, third party reporting options and advocate address and phone number information.

The facility provided a Zero Tolerance for Sexual Abuse and Sexual Harassment Posting. This posting includes the following:

Right to Report

If you, or someone you know, are experiencing sexual abuse or sexual harassment, Missoula County Detention Facility wants to know. We want you to report right away! Why?

- We want to keep YOU safe; it is our job! It is your right to be free from sexual abuse and sexual harassment.
- We want to conduct an investigation of the reported incident.
- We want to hold the perpetrator accountable for his/her actions.
- We want to provide YOU with relevant information and support services.

How to Report

The Missoula County Detention Facility offers multiple ways to report sexual abuse and sexual harassment. Reports can be made verbally, in writing, anonymously, and via a third party. Below are the methods available to report.

- Call an outside entity PREA Hotline to report by dialing 406-258-3668.
- Report to any staff member, volunteer or contractor, including medical and mental health care staff.
- Submit a grievance or an inmate request.
- Report to the facility's PREA Compliance Coordinator.
- Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report on your behalf through a third-party grievance to prea@missoulacounty.us. The third-party reporting form can be found on the website at <https://www.missoulacounty.us/government/public-safety/detention-facility/prison-rape-elimination-act>
- You also can submit a report on someone's behalf, or someone at the facility can report for you using the methods listed above.

Victim Support Services

Missoula County Detention Facility has partnered with the YWCA to provide survivors of sexual abuse with emotional support services. To access these services, contact 1-800-483-7858 or send a letter to: YWCA 1800 S 3rd St W, Missoula, MT 59801.

	*Refer to the Inmate Information and Rule Book for more information on anonymous reporting and limits to confidentiality for emotional support services. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.334	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 3. Sheriff Office Curriculum Training Overview, not dated 4. 14 Certificates of Completion, PREA: Investigating Sexual Abuse in a Confinement Setting and the Missoula County Detention Facility. Interviews and on site file review: 1. Detective Lieutenant / Investigator The interview with the Detective Lieutenant demonstrated the investigative team has completed specialized PREA training for investigators through the National Institute of Corrections. Site Observations: During the pre-audit phase specialized training records for investigators were uploaded to the online audit system. (a-b) The Missoula County Juvenile Detention Facility PAQ states the agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 16, section Procedure, states, “MCDF will provide specialized training to investigators who will be conducting administrative investigations in a confinement setting. Training will include NIC PREA: Investigating Sexual Abuse in a Confinement Setting which will cover Investigative Standards, Investigations, Working with Victims, Interviewing Techniques, and Institutional Culture and Investigations. MCDF will maintain documentation that agency investigators have completed the required specialized training. All criminal investigations will be referred to the Missoula County Sheriff’s Office for investigation. MCDF will utilize a PREA Investigation check list to ensure policy and procedures are being followed.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 15, section Policy (a-b), state, “

(a) “In addition to the general training provided to all employees pursuant to PREA Standard 115.331, MCDF shall ensure that, to the extent the agency itself conducts sexual abuse administrative investigations, its investigators have received training in conducting such investigations in confinement settings.

(b) Specialized training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement setting, and the criteria and evidence required to substantiate a case for administrative action or law enforcement referral.”

The facility provided a Sheriff Office Curriculum Training Overview. Learning objectives include the following.

- PREA Update and Standards Overview
- Legal Issues and Liability
- Culture
- Trauma Victim Response
- Medical and Mental Health Care
- First Response and Evidence Collection
- Adult Interviewing Techniques
- Report Writing
- Report Writing
- Prosecutorial Collaboration

	(c) The Missoula County Juvenile Detention Facility PAQ states the agency maintains documentation showing that investigators have completed the required training. The number of investigators currently employed who have completed the required training is 14. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 15, section Policy (c-d), state, (a) MCDF will maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. (b) Any State entity or Department of Justice component that investigates sexual abuse in confinement settings shall provide such training to its agents and investigators who conduct such investigations.” The facility provided 14 Certificates of Completion, PREA: Investigating Sexual Abuse in a Confinement Setting. These certificates demonstrate Investigator Training was completed through the National Institute of Corrections for Investigators and the Missoula County Detention Facility. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.335	Specialized training: Medical and mental health care
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 3. 25 Wellpath Academy Certificates of Completion Prison Rape Elimination Act Training

Interviews:

1. Health Services Coordinator - Contractor
2. Mental Health Coordinator - Contractor

The interview with Medical and Mental Health Practitioners demonstrated each completes annual specialized training for medical and mental health practitioners, as well as annual training on the Missoula County Detention Facility PREA policy. They further demonstrated all contracted medical and mental health personnel are required to complete both the specialized training and annual PREA policy review.

Site Observations:

During the pre-audit phase, documentation demonstrating completion of the required specialized training for medical and mental health practitioners was uploaded to the Online Audit System.

(a) The Missoula County Juvenile Detention Facility PAQ states the agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. The facility has 16 (100%) contractors who work at the facility have received training required by agency policy.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 17, section Procedure, states, “MCDF is contracted with First Step Providence with a SANE (Sexual Assault Nurse Examiner) and on site medical staff will not conduct forensic examinations. Medical and Mental Health staff will complete specialized training on PREA standards and procedures to include: How to detect and assess signs of sexual abuse and sexual harassment; How to preserve physical evidence of sexual abuse; How to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment; and How and to whom to report allegations or suspicions of sexual abuse and sexual harassment. Documentation of completion for each and employee and the training curriculum are provided to the PREA Compliance Coordinator. “

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 16, section Policy 1-4, states, “MCDF will ensure that all full and part-time medical and mental health care practitioners who work regularly in facilities will receive specialized training in:

- (1) How to detect and assess signs of sexual abuse and sexual harassment;

- (2) How to preserve physical evidence of sexual abuse;
- (3) How to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment; and
- (4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

(b) The Missoula County Juvenile Detention Facility PAQ states their medical staff do not conduct forensic medical exams. The PAQ states, "Forensic medical exams are conducted externally by SANES/SAFEs at First Step Resource Center."

Missoula County Detention Facility PREA Policy and Procedure - Juvenile Facility, page 16, section Policy (b), states, "If medical staff employed by the facility conduct forensic examinations, such medical staff shall receive the appropriate training to conduct such examinations."

(c) The Missoula County Juvenile Detention Facility PAQ states the agency maintains documentation showing that medical and mental health practitioners have completed the required training.

Missoula County Detention Facility PREA Policy and Procedure - Juvenile Facility, page 16, section Policy (c-d), state,

(a) "MCDF will maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the facility or elsewhere.

(b) Medical and mental health care practitioners shall also receive the training mandated for employees under § 115.331 or for contractors and volunteers under § 115.332, depending upon the practitioner's status at the facility."

The facility provided Wellpath Certificates of Completion Prison Rape Elimination Act Training for 25 contractors.

Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. Interviews with medical and mental health practitioners demonstrated specialized PREA training is reinforced through both annual discipline-specific training and annual review of the Missoula County Detention Facility PREA policy, ensuring contracted practitioners remain

	knowledgeable regarding their PREA responsibilities. Documentation further demonstrated the contracted medical provider has developed a comprehensive PREA training curriculum specifically addressing the responsibilities of medical and mental health practitioners, including recognizing signs of sexual abuse and sexual harassment, preserving evidence, maintaining professional boundaries, responding professionally to victims, and reporting allegations or suspicions of sexual abuse. The curriculum further incorporates knowledge checks to verify comprehension of required PREA concepts. During the pre-audit phase, the facility uploaded documentation demonstrating completion of specialized PREA training, including 25 Wellpath Certificates of Completion, confirming consistent implementation of the training program for contracted medical and mental health personnel.
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115.341	Obtaining information from residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 3. Missoula County Detention Facility Prison Rape Elimination Act (PREA) Juvenile Rights Form / Juvenile Rights Screening Tool, not dated 4. Missoula County Detention Facility Prison Rape Elimination Act (PREA) Inmate Rights Form, dated 4.2.2025 5. Post Audit: Memorandum, Subject: Juvenile Detention, Annual Reassessment, not dated Interviews: 1. Random Youth 2. Targeted Youth 3. Corporal Interviews with nine youth demonstrated they were asked risk screening questions during the booking process, including questions regarding prior sexual abuse or abusive behaviors, how they identify, personal safety concerns, and whether they had any medical, mental health, or educational needs requiring attention.

The interview with the Corporal demonstrated he begins every intake by explaining why the facility conducts risk screenings, the purpose of the Prison Rape Elimination Act, and where youth can find PREA reporting information throughout the facility before conducting the assessment. He further stated risk screenings are completed in a private, one-on-one setting during booking, where he evaluates each youth's responses regarding gender identity, interactions with others, personal safety concerns, prior sexual victimization or abusiveness, demeanor, and body language before making an appropriate housing recommendation.

Site Observations:

Utilization of the PREA Audit – Juvenile Facilities Documentation Review – Resident Files / Records Review template demonstrated eight of the nine youth reviewed had been admitted within the previous 12 months. Documentation demonstrated each of the eight youth received a completed risk assessment on the day of admission. One youth did not have a documented annual/periodic reassessment; however, that youth left the day of the onsite review.

Post audit, the Jail Commander provided a memorandum with the following sustainable action plan. “In accordance with the PREA Standard 115.341, the PREA Coordinator will minimally conduct an annual re-assessment of individuals held in juvenile detention. Assessments shall include information about:

1. Prior sexual victimization or abusiveness,
2. Gender nonconforming appearance or manner or identification as lesbian, gay, bisexual, transgender, or intersex, and whether the resident may therefore be vulnerable to sexual abuse,
3. Current charges and offense history,
4. Age
5. Level of emotional and cognitive development,
6. Physical size and stature,
7. Mental Illness or mental disabilities,
8. Intellectual or developmental disabilities,
9. Physical disabilities,
10. The resident’s own perception of vulnerability, and
11. Any other specific information about individual residents that may indicate

heightened needs for supervision, additional safety precautions, or separation from certain other residents.

(a) The Missoula County Juvenile Detention Facility PAQ states the facility has a policy that requires screening, upon admission or transfer, for risk of sexual abuse victimization or sexual abusiveness toward other residents. The policy requires that residents be screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their intake. The number of residents entering the facility (either through intake or transfer) within the past 12 months whose length of stay in the facility was for 72 hours or more and who were screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their entry into the facility was 101.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 19, section 115.341-Obtaining information from inmates, Procedure, states, “MCDF will read each youth the Prison Rape Elimination Act (PREA) Juvenile Rights Form and have it signed by youth to ensure they fully understand the statement. Following acknowledgement of the Rights Form, a risk assessment will be completed by staff for housing classification. The risk assessment will include all youth information described in policy. Information will be confidential and only the scored designation will be available to all staff. The PREA Compliance Coordinator will receive information on all youth who score as high risk for sexual harassment and/or assault. Risk assessment will be completed within 72 hours of intake.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 18, section 115.341-Obtaining information from inmates, Policy (a), states, “To ensure that the facility has identified those at heightened risk of being sexually victimized and those at heightened risk of being sexually abusive so that it can make housing and programming decisions with the goal being to use information to prevent sexual abuse.

(a) Within 72 hours of the youth’s arrival at the facility and periodically throughout a youth’s confinement, MCDF shall obtain and use information about each youth’s personal history and behavior to reduce the risk of sexual abuse by or upon a youth.”

(b) The Missoula County Juvenile Detention Facility PAQ states the Risk assessment is conducted using an objective screening instrument.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 18, section 115.341-Obtaining information from inmates, Policy (b), states,

“Such assessments shall be conducted using an objective screening instrument.”

The facility provided a Missoula County Detention Facility Prison Rape Elimination Act (PREA) Inmate Rights / Juvenile Rights Screening Form. This form states the following to inmates. “The Missoula County Detention Facility has ZERO TOLERANCE for sexual abuse and sexual harassment. You have the right to be free from sexual abuse and sexual harassment, as well as from retaliation for reporting such incidents while you are here. You will be provided with information regarding our agency’s ZERO TOLERANCE policy and reporting procedures. We are asking the following questions to keep you sexually safe while in the Missoula County Detection Facility.

We are required to ask you a series of questions. Please understand that we are not forcing you to answer these questions, but we must ask each question individually.

If you chose not to answer a particular question, we will not hold it against you in any way. If you choose to answer the question, it is important that you answer truthfully.

If you fully understand this statement, please sign and date.”

Juvenile Rights Screening Form:

Name/Date

Sex assigned at birth:

Currently Identifies as: Male/Female/Transgender/Lesbian/Gay/Bisexual/Gender Nonconforming

Race: White/Hispanic/African American/Native American/Pacific Islander/Asian/ Other/Unknown

Current charges

1. How old are you?
2. Is this your first time in a juvenile detention facility
3. Do you feel you get along with people?
4. Do you find it easy to make friends?

5. Do you feel okay being in groups of people you don't know well?
 6. Do you never, sometimes, or often feel at risk from attack or abuse from other people?
 7. Have you never, sometimes, or often been attacked, bullied, or abused by your peers?
 8. Have you ever had a sexual experience that you did not want to have? (If yes, refer to mental health)
 9. Have you ever been arrested on a sexual offense? (If yes, refer to mental health)
 10. Have you ever been arrested on a violent offense? (Assault, Robbery, Kidnapping, etc.)
 11. Have you ever engaged in behavior that you would consider violent and/or sexual?
 12. Staff's perception of the juvenile's presentation and behavior (check all that apply):
 13. Is there any observed behavior that does not appear age appropriate? (Example: cognitive/emotional)
 14. File Review: Does the file indicate a sexual offense for any sexually related charge?
 15. Overall risk score for vulnerability to victimization (Combine 1-7 & 12-13 scores):
 16. Overall risk score for potential aggressor (Total of 9-11):
- Is youth a known Victim? (answered "Yes" to question 8):
- Is the youth a potential Victim? (Overall risk score on "A." is 9 or higher):
- Is the youth a potential violent or sexual aggressor? (Overall risk score on "B." is 5 or higher):
- Is the youth a known sexual aggressor? (Answered "yes" to question 14):
- If "Yes" to being a known Victim and/or known sexual aggressor, Medical and Mental Health
- Services must be offered. Does the youth want either of these services?
- Is a report of abuse or neglect required? (If yes, submit via CPS & Law Enforcement)

Is a referral to mental health required? (Are either of the past 2 questions “Yes”)

Staff Name & Badge/Date & Time Screened/Supervisor Review

(c) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 17, section 115.341-Obtaining information from inmates, Policy (c) 1-11, states, “At a minimum, MCDF shall attempt to ascertain information about:

- (1) Prior sexual victimization or abusiveness;
- (2) Any gender nonconforming appearance or manner or identification as lesbian, gay, bisexual, transgender, or intersex, and whether the youth may therefore be vulnerable to sexual abuse;
- (3) Current charges and offense history;
- (4) Age;
- (5) Level of emotional and cognitive development;
- (6) Physical size and stature;
- (7) Mental illness or mental disabilities;
- (8) Intellectual or developmental disabilities;
- (9) Physical disabilities;
- (10) The youth’s own perception of vulnerability; and
- (11) Any other specific information about individual youth that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other youth.

(d) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 17, section 115.341-Obtaining information from inmates, Policy (d), states, “This information shall be ascertained through conversations with the youth during the intake process and medical and mental health screenings; during classification assessments; and by reviewing court records, case files, facility behavioral records, and other relevant documentation from the youth’s files.”

The facility provided a Missoula County Detention Facility Prison Rape Elimination Act (PREA) Inmate Rights Form. This form states the following to inmates. The Missoula County Detention Facility has ZERO TOLERANCE for sexual abuse and

	sexual harassment. You have the right to be free from sexual abuse and sexual harassment, as well as from retaliation for reporting such incidents while you are here. You will be provided with information regarding our agency's ZERO TOLERANCE policy and reporting procedures. We are asking the following questions to keep you sexually safe while in the Missoula County Detention Facility. By signing this form, you acknowledge that you received the Sexual Assault and Staff Sexual Misconduct brochure during intake. You acknowledge that you were provided information on the zero-tolerance policy, that staff will investigate every report of abuse or harassment, inmates are never punished for reports of good faith, how to report sexual abuse, no one deserves to be abused or harassed, sexual abuse is never victim's fault, your right to be free from retaliation for reporting, and contact information to victim advocate services. We are required to ask you a series of questions. Please understand that we are not forcing you to answer these questions, but we must ask each question individually. If you chose not to answer a particular question, we will not hold it against you in any way. If you choose to answer the question, it is important that you answer truthfully. If you fully understand this statement, please sign and date." (e) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 17, section 115.341-Obtaining information from inmates, Policy (e) states, "MCDF will implement appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the youth's detriment by staff or other youth." Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.342	Placement of residents
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion

Document Review:

1. Missoula County Juvenile Detention Facility PAQ
2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023
3. Victim/Aggressor Tracking Sheet
4. Missoula County Detention Facility Juvenile Housing Per PREA, Exigent Circumstances Log, not dated

Interviews:

1. Detention Unit Manager

Although the facility did not have any targeted youth residing at the facility during the onsite review, the Unit Manager demonstrated vulnerable youth are never housed in the same room with an aggressive youth and, when population levels permit, are not housed within the same living pod. He further stated Detention Officers complete risk assessments on every shift as applicable; however, once the assessment is entered into the agency's New World database, access is restricted to designated administrative personnel.

Site Observations:

During the onsite review, the Unit Manager provided the Missoula County Detention Facility Juvenile Housing Per PREA, Exigent Circumstances Log. The log tracks PREA housing decisions and includes a PREA Status Legend identifying Known Victims (KV), Potential Victims (PV), Potential Aggressors (PA), and Known Aggressors (KA), as well as the start and end dates of housing assignments, youth names, PREA status, and detailed justification for any housing override due to exigent circumstances.

(a) The Missoula County Juvenile Detention Facility PAQ states the facility uses information from the risk screening required by §115.3341 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive. The number of residents at risk of sexual victimization who were placed in isolation in the past 12 months was zero.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 20, section 115.342- Placement of inmates in housing, bed, program,

education, and work assignments, Procedure, states, "The Administrative Team will meet weekly during the inmate management plan meeting to review any special circumstances with youth. "

The facility provided a Victim/Aggressor Tracking Sheet. The Tracking Sheet documents the following information.

- Booking date
- Cell
- Facility
- Pod
- Name
- Adult/Juvenile
- Aggressor / Victim
- Date Assessed

(b) The Missoula County Juvenile Detention Facility PAQ states the facility has a policy that residents at risk of sexual victimization may only be placed in isolation as a last resort if less restrictive measures are inadequate to keep them and other residents safe, and only until an alternative means of keeping all residents safe can be arranged. The facility policy requires that residents at risk of sexual victimization who are placed in isolation have access to legally required educational programming, special education services, and daily large-muscle exercise. The number of residents at risk of sexual victimization who were placed in isolation in the past 12 months was zero.

Missoula County Detention Facility PREA Policy and Procedure - Juvenile Facility, page 19, section 115.342- Placement of inmates in housing, bed, program, education, and work assignments, Policy (a), states, "MCDF will use all information obtained pursuant to § 115.341 and subsequently to make housing, bed, program, education, and work assignments for youth with the goal of keeping all youth safe and free from sexual abuse.

(a) Youth may be isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other youth safe, and then only until an alternative means of keeping all youth safe can be arranged. During any period of isolation, MCDF shall not deny youth daily large-muscle exercise and any legally required educational programming or special education services. Youth in isolation

	shall receive daily visits from a medical or mental health care clinician. Youth shall also have access to other programs and work opportunities to the extent possible.” (h) The Missoula County Juvenile Detention Facility PAQ states from a review of case files of residents at risk of sexual victimization who were held in isolation in the past 12 months, the number of case files that include both was zero. (i) The Missoula County Juvenile Detention Facility PAQ states if a resident at risk of sexual victimization is held in isolation, the facility affords each such resident a review every 30 days to determine whether there is a continuing need for separation from the general population. Based on documentation review, interviews, and site observations, the facility exceeds compliance with this standard. The agency has implemented multiple operational safeguards to ensure housing assignments protect youth from sexual abuse, including weekly administrative inmate management reviews, a Victim/Aggressor Tracking Sheet, restricted access to electronic risk assessment information, and a comprehensive PREA Housing Exigent Circumstances Log documenting housing decisions, overrides, and the justification for any deviation from standard placement practices. Interviews further demonstrated vulnerable youth are not housed with aggressive youth and, whenever population levels permit, are separated by living pod. Collectively, these practices demonstrate a proactive and well-documented system for managing housing decisions that extends beyond the minimum requirements of the standard.
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115.351	Resident reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 3. Missoula County Detention Facility – Missoula County Detention Facility – Sexual Assault and Staff Misconduct Brochure, not dated

Interviews:

1. Random Youth
2. Targeted Youth
3. Detention Officers
4. Jail Commander

Interviews with youth demonstrated each was aware they could report sexual harassment or sexual abuse through the PREA hotline, directly to a Detention Officer, by submitting a grievance or kite, or through a family member. Youth further demonstrated an understanding that reports could be made anonymously and consistently stated they felt comfortable reporting concerns to staff.

Interviews with Detention Officers demonstrated each would accept reports of sexual harassment or sexual abuse in any manner a youth chose to report the allegation. Staff consistently emphasized that every report is taken seriously and that any knowledge, suspicion, or information received is immediately reported through the appropriate chain of command.

The interview with the Unit Manager demonstrated outgoing mail is not opened; however, mailing addresses are verified prior to mailing. Incoming mail is opened in the presence of the youth to inspect for contraband, after which the envelope is discarded.

Site Observations:

During the onsite review, the PREA hotline was tested utilizing a youth telephone. Due to an isolated system glitch, the call could not be completed. The Jail Commander immediately researched the issue and provided system reports demonstrating successful hotline calls on the days preceding and following the onsite review, indicating the issue was isolated and the reporting system remained operational.

(a) The Missoula County Juvenile Detention Facility PAQ states the agency has established procedures allowing for multiple internal ways for Residents to report privately to agency officials about sexual harassment, abuse, retaliation and or any type of neglect.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 21, section, 115.351- Inmate Reporting, Procedure, states, “MCDF staff who witness a PREA violation can report to the Sheriff’s office, the PREA hotline, to Human Resource, inform the PREA Compliance Coordinator, and/or report to any supervisor. Staff cannot remain anonymous and have a duty to report violations.

Regardless of its source, staff, contractors and/or volunteers who receive information concerning a youth and sexually abusive behavior, or who observe an incident of sexually abusive behavior, or who have a reasonable cause to suspect that a youth has been or is being subject to sexually abusive behavior must immediately report such to his/her supervisor and the shift supervisor and/or designee.

Youth will have the option of calling the PREA Hotline at 1-406-258-3668, file a written grievance, file a written request to medical staff, have a third party report filed on their behalf via the website, <https://www.missoulacounty.us/government-/public-safety/detention-facility>, and they can report verbally to any staff member. “

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 20, section, 115.351- Inmate Reporting, Policy (a), states, “To ensure that youth and staff can report sexual abuse, regardless of who the perpetrator is and regardless of what other dangers they may face for doing so, by providing them with multiple avenues to report, including an avenue outside the facility, so that even if the abuser is someone directly supervising that youth or higher up in the authority chain, or a staff person or youth who might retaliate against that inmate, the victim still has a safe way to report. Thus, sexual abuse is always reported, which in turn is a deterrent of future abuse.

(a) MCDF will provide multiple internal ways for youth to privately report sexual abuse and sexual harassment, retaliation by other youth or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.”

The facility provided a Missoula County Detention Facility – Missoula County Detention Facility – Sexual Assault and Staff Misconduct Brochure. The brochure provided the following information.

- Sexual assault and staff sexual misconduct are against the law.
- MCDF is committed to your safety and the safety of staff.

- MCDF has ZERO TOLERANCE for sexual assault.
- What is sexual assault
- Examples of sexual assault
- How to prevent sexual assault
- What to do if you've been sexually assault
- PREA Hotline at 1.406.258.3668
- YWCA provides survivors of sexual abuse with emotional support services – to include YWCA address and phone number.
- How to report sexual assault and your options

(b) The Missoula County Juvenile Detention Facility PAQ states facility provides at least one way for residents to report abuse or harassment to a public or private entity or office that is not part of the agency. The agency does not have a policy requiring residents detained solely for civil immigration purposes be provided information on how to contact relevant consular officials and relevant officials of the Department of Homeland Security.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 20, section, 115.351- Inmate Reporting, Policy (b), states, “MCDF will also provide at least one way for youth to report abuse or harassment to a public or private entity or office that is not part of MCDF and that is able to receive and immediately forward youth reports of sexual abuse and sexual harassment to facility officials, allowing the youth to remain anonymous upon request. Youth detained solely for civil immigration purposes shall be provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security.”

(c) The Missoula County Juvenile Detention Facility PAQ states the agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously and from third parties. The agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously and from third parties.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 21, section, 115.351- Inmate Reporting, Policy (c), states, “Staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall

	promptly document any verbal reports.” (d) The Missoula County Juvenile Detention Facility PAQ states the facility provides residents with access to tools to make written reports of sexual abuse or sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 20, section, 115.351- Inmate Reporting, Policy (d), states, “MCDF will provide youth with access to tools necessary to make a written report.” (e) The Missoula County Juvenile Detention Facility PAQ states the agency has established procedures for staff to privately report sexual abuse and sexual harassment of residents. Staff are informed of these procedures in the following ways. The PAQ states, “Reports can be made to the Sheriff’s Office, the PREA hotline, the PREA email, any supervisor, to HR, and/or to the PREA Coordinator.” Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 20, section, 115.351- Inmate Reporting, Policy (e), states, “MCDF will provide a method for staff to privately report sexual abuse and sexual harassment of youth.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.352	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 3. Youth Notification of Investigation Extension, not dated

4. Missoula County Detention Facility Inmate Information and Rule Book, dated 2022

Interviews:

1. Random Youth
2. Targeted Youth
3. PREA Coordinator

Interviews with youth demonstrated each was aware of the grievance process and understood they could submit a grievance regarding sexual harassment or sexual abuse. Youth consistently stated grievance forms were readily available upon request, and if they did not have a pencil or writing utensil, staff would immediately provide one.

The interview with the PREA Coordinator demonstrated grievance boxes are checked daily by the Unit Manager or other designated staff, including weekends, to ensure grievances are promptly collected and processed.

(a) The Missoula County Juvenile Detention Facility PAQ states the agency has an administrative procedure for dealing with resident grievances regarding sexual abuse.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 23, section 115.352- Exhaustion of administrative remedies, Procedure, states, “MCDF has an established 3rd party reporting form specifically for sexual abuse, available on the website, <https://www.missoulacounty.us/government/public-safety/-detention-facility> which will then be emailed to the a confidential email, prea@missoulacounty.us. MCDF will check with the victim to verify if they want to pursue the complaint. Anytime a youth declines, it will be documented by staff. MCDF will follow a 48-hour response on all emergency sexual abuse grievances with a 5 day follow up. If a youth files a grievance related to sexual abuse in bad faith, the youth may be issued disciplinary action. “

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 21, section 115.352- Exhaustion of administrative remedies, Policy (a) 1-4, states, “To ensure that the substance of sexual abuse allegations is heard and evaluated by both confinement facilities and federal courts, when appropriate, without being barred by procedural requirements.

- (a)(1) MCDF will not impose a time limit on when a youth may submit a grievance regarding an allegation of sexual abuse.
- (2) MCDF may apply otherwise-applicable time limits on any portion of a grievance that does not allege an incident of sexual abuse.
- (3) The MCDF will not require a youth to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.
- (4) Nothing in this section shall restrict MCDF's ability to defend against a lawsuit filed by a youth on the ground that the applicable statute of limitations has expired."
- (b) The Missoula County Juvenile Detention Facility PAQ states the agency policy or procedure allows a resident to submit a grievance regarding an allegation of sexual abuse at any time regardless of when the incident is alleged to have occurred. Policy compliance can be found in provision (a) of this standard.
- (c) The Missoula County Juvenile Detention Facility PAQ states the agency's policy and procedure allows a resident to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. The agency's policy and procedure requires that a resident grievance alleging sexual abuse not be referred to the staff member who is the subject of the complaint.
- Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 22, section 115.352- Exhaustion of administrative remedies, Policy (b) 1-2, states, "MCDF will ensure that—
- (1) A youth who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and
- (2) Such grievance is not referred to a staff member who is the subject of the complaint."
- (d) The Missoula County Juvenile Detention Facility PAQ states the agency's policy and procedures that require a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 90 days of the filing of the grievance. In the past 12 months there have been zero grievances filed alleging sexual abuse.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility,

page 22, section 115.352- Exhaustion of administrative remedies, Policy (c) 1-4, state,

(c)(1) "MCDF will issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.

(2) Computation of the 90-day time period shall not include time consumed by youth in preparing any administrative appeal.

(3) MCDF may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. MCDF will notify the youth in writing of any such extension and provide a date by which a decision will be made.

(4) At any level of the administrative process, including the final level, if the youth does not receive a response within the time allotted for reply, including any properly noticed extension, the youth may consider the absence of a response to be a denial at that level."

The facility provided a Missoula County Detention Facility Inmate Notification of Investigation Extension. This documents the following information.

PREA Standard 115.52 Exhaustion of administrative remedies: MCDF may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision.

- Date:
- PREA Incident #:
- Inmate Name:
- Date of initial PREA report:
- 90-day closure date:
- 70-day extension date:
- Investigation Type: ☐ Sexual Harassment ☐ Sexual Abuse
- Date Investigation Began:
- Investigating Agency: ☐ Missoula County Detention Facility ☐ Missoula County Sheriff's Office
- Reason for extension:

The form is signed and dated by both the inmate and PREA Compliance Coordinator.

(e) The Missoula County Juvenile Detention Facility PAQ states agency policy and procedure permits third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of residents. Agency policy and procedure requires that the resident declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the resident's decision to decline.

Agency policy allows parents or legal guardians of residents to file a grievance alleging sexual abuse, including appeals, on behalf of such resident, regardless of whether or not the resident agrees to having the grievance filed on their behalf. The number of grievances alleging sexual abuse filed by residents in the past 12 months in which the resident declined third-party assistance, containing documentation of the resident's decision to decline was zero.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 22, section 115.352- Exhaustion of administrative remedies, Policy (d) 1-4, state,

(d)(1) Third parties, including fellow youth, staff members, family members, attorneys, and outside advocates, shall be permitted to assist youth in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of youth.

(2) If a third party, other than a parent or legal guardian, files such a request on behalf of a youth, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.

(3) If the youth declines to have the request processed on his or her behalf, MCDF shall document the youth's decision.

(4) A parent or legal guardian of a juvenile shall be allowed to file a grievance regarding allegations of sexual abuse, including appeals, on behalf of such juvenile. Such a grievance shall not be conditioned upon the juvenile agreeing to have the request filed on his or her behalf."

(f) The Missoula County Juvenile Detention Facility PAQ states the facility has a policy and established procedures for filing an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse. The facilities policy and procedures for emergency grievances alleging substantial risk of imminent sexual abuse require an initial response within 48 hours. The facilities policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse require that a final agency decision be issued within 5 days. Zero grievances were received alleging substantial risk of imminent sexual abuse, that were filed in the past 12 months, reached final decisions within 40 days.

Missoula County Detention Facility PREA Policy and Procedure - Juvenile Facility, page 23, section 115.352- Exhaustion of administrative remedies, Policy (e) 1-2, state,

(e)(1) "MCDF will establish procedures for the filing of an emergency grievance alleging that a youth is subject to a substantial risk of imminent sexual abuse.

(2) After receiving an emergency grievance alleging a youth is subject to a substantial risk of imminent sexual abuse, MCDF shall immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken, shall provide an initial response within 48 hours, and shall issue a final agency decision within 5 calendar days. The initial response and final agency decision shall document the agency's determination whether the youth is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance."

The facility provided a Missoula County Detention Facility Inmate Information and Rule Book. Page 16-17, section 513., states, "513. Grievance Procedures - Inmates may utilize the formal grievance process when they believe there are legitimate issues they wish to address about conditions of confinement, treatment, PREA, or other aspects of their stay with MCDF. Inmates will not express their grievances in disruptive, threatening, or insubordinate manners. Inmates will not agitate or organize other inmates into any sort of disruptive action or organized resistance against facility policy, orders, procedures, or personnel. Inmates who have grievances will submit them in writing after attempting an informal resolution."

(g) The Missoula County Juvenile Detention Facility PAQ states the facility has a written policy that limits its ability to discipline a resident for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the

	resident filed the grievance in bad faith. In the past 12 months, there have been zero grievances alleging sexual abuse to occasions where the agency demonstrated that the Resident filed the grievance in bad faith. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 22, section 115.352- Exhaustion of administrative remedies, Policy (f), states, “MCDF may discipline a youth for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the youth filed the grievance in bad faith.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.353	Resident access to outside confidential support services and legal representation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Zero Tolerance Posting, not dated 3. Memorandum of Understanding between Missoula County Detention Center and the YWCA, dated 8.19.2025 Interviews: 1. Random Youth 2. Targeted Youth 3. PREA Coordinator 4. Assistant Jail Commander Interviews with youth demonstrated an awareness of the victim advocate information posted throughout the facility. Two youth stated they had previously interacted with YWCA advocates and understood advocates were available to provide support following an incident of sexual abuse.

Site Observations:

During the onsite review, the Auditor contacted the YWCA utilizing a youth telephone located within a pod. After identifying the purpose of the call, the advocate stated the agency does not accept reports on behalf of youth; however, advocates are available to accompany victims during forensic medical examinations, interviews and provide ongoing emotional support services by telephone following an incident of sexual abuse.

(a) The Missoula County Juvenile Detention Facility PAQ states the facility provides residents with access to outside victim advocates for emotional support services related to sexual abuse.

- The facility provides residents with access to such services by giving residents (by providing, posting, or otherwise making accessible) mailing addresses and telephone numbers (including toll-free hotline numbers where available) for local, State, or national victim advocacy or rape crisis organizations.
- The facility provides residents (by providing, posting, or otherwise making accessible) with access to such services by giving residents mailing addresses and telephone numbers (including toll-free hotline numbers where available) for immigrant services agencies for persons detained solely for civil immigration purposes.
- The facility provides residents with access to such services by enabling reasonable communication between residents and these organizations in as confidential a manner as possible.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 23, section 115.353- Inmate access to outside confidential support services, Policy (a), states, “To provide youth access to outside victim advocates for emotional support services related to sexual abuse.

(a) MCDF will provide access to support via postings, or otherwise making accessible mailing addresses and telephone numbers, including toll free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations, and, for persons detained solely for civil immigration purposes, immigrant services agencies. MCDF will enable reasonable communication between youth and these organizations and facilities, in as confidential a manner as possible.”

The facility provided a Zero Tolerance for Sexual Abuse and Sexual Harassment Posting. This posting includes the following:

Victim Support Services

Missoula County Detention Facility has partnered with the YWCA to provide survivors of sexual abuse with emotional support services. To access these services, contact 1-800-483-7858 or send a letter to: YWCA 1800 S 3rd St W, Missoula, MT 59801.

(b) The Missoula County Juvenile Detention Facility PAQ states the facility informs residents, prior to giving them access to outside support services, the extent to which such communications will be monitored. The facility informs residents, prior to giving them access to outside support services, of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply for disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant Federal, State, or local law.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 23, section 115.53- Inmate access to outside confidential support services, Policy (c), states, “MCDF will inform youth, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.”

(c) The Missoula County Juvenile Detention Facility PAQ states the facility maintains memoranda of understanding with community service providers that are able to provide residents with emotional support services related to sexual abuse.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 23, section 115.353- Inmate access to outside confidential support services, Policy (b), states, “MCDF will maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide youth with confidential emotional support services related to sexual abuse. MCDF will maintain copies of agreements or documentation showing attempts to enter into such agreements.”

The facility provided a Memorandum of Understanding between Missoula County Detention Center and the YWCA. The MOU appears to be current with no stated

	expiration date. The MOU is signed by the Missoula County Juvenile Detention Center Jail Commander and the YMCA Director of Programs. (d) The facility provides residents with reasonable and confidential access to their attorneys or other legal representation. The facility provides residents with reasonable access to parents or legal guardians. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 24, section 115.353- Inmate access to outside confidential support services, Policy (d), states, “MCDF will also provide youth with reasonable and confidential access to their attorneys or other legal representation and reasonable access to parents or legal guardians.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.354	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 3. Missoula County Detention Facility PREA Third Party Reporting Form, not dated Interviews: 1. Random Youth 2. Targeted Youth 3. Detention Officers 4. PREA Coordinator Interviews with youth demonstrated an understanding of third-party reporting,

stating they could tell family members or friends, who could report allegations of sexual harassment or sexual abuse on their behalf.

Interviews with Detention Officers demonstrated any third-party report of sexual harassment or sexual abuse would be immediately reported to the Unit Manager and the PREA Coordinator. Staff consistently emphasized that every report is taken seriously, regardless of the source.

Site Observations:

During the tour of the contact and non-contact visitation areas, third-party reporting information was observed on PREA Zero-Tolerance postings. Third-party reporting information was also prominently displayed in areas accessible to youth throughout the facility.

(a) The Missoula County Juvenile Detention Facility PAQ states the facility provides a method to receive third-party reports of resident sexual abuse or sexual harassment. The agency publicly distributes information on how to report resident sexual abuse or sexual harassment on behalf of residents.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 24, section 115.354- Third-party reporting, Procedure, states, “Any reports of sexual abuse or harassment from a third parties should be immediately referred to the PREA Compliance Coordinator. MCDF has an established 3rd party reporting form specifically for sexual abuse, available on the website, <https://www.missoula-county.us/government/public-safety/detention-facility> which will then be emailed to a confidential email, prea@missoulacounty.us. Third-party reports of sexual abuse and sexual harassment can also be reported via the PREA Hotline at 1-406-258-3668. MCDF will display a poster in the lobby and visiting areas (and other areas deemed appropriate) outlining how third parties can report an incident of sexual abuse or sexual harassment.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 24, section 115.354- Third-party reporting, Policy, states, “Any reports of sexual abuse or harassment from a third part should be immediately referred to the PREA Compliance Coordinator. MCDF has an established 3rd party reporting form specifically for sexual abuse, available on the website, <https://www.missoulacounty.us/government/public-safety/detention-facility> which will then be emailed to a confidential email, prea@missoulacounty.us. Third-party reports of sexual abuse and sexual harassment can also be reported via the PREA Hotline at 1-406-258-3668. MCDF will display a poster in the lobby and visiting areas (and

other areas deemed appropriate) outlining third parties how to report an incident of sexual abuse or sexual harassment. “

The facility provided a Missoula County Detention Facility PREA Third Party Reporting Form. The form allows the third party to submit the following information.

- Inmate’s Name
- Date of Alleged Incident:
- Time of Alleged Incident:
- Who was involved:
- What Happened:
- Where did it occur:
- How did it occur:
- Any other Pertinent Information:
- Please provide your contact information in case we need to follow-up with you.
 - o Your Name:
 - o Telephone #:
 - o Email:
- Upon completion of this form, please return to the receptionist. You may also email this form to prea@missoulacounty.us or fax to 406-258-4080, Attn: PREA Coordinator.
- Missoula County Detention Facility has a Zero Tolerance Policy for all forms of sexual abuse or sexual harassment.

On 4.15.2026 at 9:32 am the following email to PREA@missoulacounty.us:

My name is Karen Murray, and I am currently preparing to conduct a PREA audit at the Missoula County Sheriff’s Office Jail and Juvenile facilities. Could you please advise what steps are taken if a complaint of sexual harassment or sexual abuse is received through this email address?

Thank you in advance for your assistance. I appreciate any information you are able to provide.

	On 4.27.2026 at 8:18 am, the following response was received from the agency PREA Coordinator. "If there was a complaint through this email, I would respond immediately to it and get the information I needed. If it was a friend or family member of an inmate, I would want the information about the inmate and what they were reporting so I could start the investigation process. If it was an inmate writing to me, then I would follow-up with them and get the information needed to start the investigation." Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.361	Staff and agency reporting duties
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 Interviews: 1. Unit Manager The interview with the Unit Manager demonstrated all required external notifications are completed the same day an allegation is received. He further stated parents or guardians are encouraged to meet with facility staff in person to discuss the incident, when available. To accommodate family schedules, parents and guardians are offered the opportunity to visit with their youth daily, and court officials are afforded the flexibility to meet with youth as their schedules permit. Site Observations: Review of investigations demonstrated the facility completed three `administrative investigations involving allegations of sexual harassment during the previous 12 months. The allegations were reported either directly to staff or through the Smart.com reporting system.

(a) The Missoula County Juvenile Detention Facility PAQ states the agency requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. The agency requires all staff to report immediately and according to agency policy any retaliation against Residents or staff who reported such an incident. The agency requires all staff to report immediately and according to agency policy any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 25-26, section 115.361- Staff and agency reporting duties; Reporting of allegations, Procedure, states, “All allegations of sexual abuse and sexual harassment, including third-party and anonymous reports will be reported to the PREA Compliance Coordinator. The legal guardian of the victim will be contacted within 14 days of the report, unless the facility has official documentation showing the parents or legal guardians should not be notified. If the victim is under guardianship of the child welfare system, the report shall be made to the caseworker. If a juvenile court retains jurisdiction over the alleged victim, the juvenile’s attorney will be notified.

Montana Code Annotated 41-3-201. Reports. When professionals or officials know or have reasonable cause to suspect, as a result of information they received in their professional or official capacity, that a child is abused or neglected by anyone regardless of whether the person suspected of causing the abuse or neglect is a parent or other person responsible for the child’s welfare, they shall report the matter promptly to the department of public health and human services.

Montana Child Abuse Hotline 1-866-820-5437 (toll free, 24 hours)”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 24, section 115.361- Staff and agency reporting duties; Reporting of allegations, Policy (a), states, “To establish a strong, effective reporting culture among staff and ensure that the facility receive timely information about sexual abuse, sexual harassment, retaliation, and staff neglect or violations of responsibilities that may have contributed to an incident or retaliation. The standard requires MCDF to ensure facility staff report all allegations, while also taking steps to protect the confidentiality of sexual abuse information by sharing internally with only those who need to know.

(a) MCDF will require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is

part of the facility; retaliation against youth or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.”

(b) The Missoula County Juvenile Detention Facility PAQ states the agency requires all staff to comply with any applicable mandatory child abuse reporting laws.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 24, section 115.361- Staff and agency reporting duties; Reporting of allegations, Policy (b), states, “MCDF will also require all staff to comply with any applicable mandatory child abuse reporting laws.”

(c) The Missoula County Juvenile Detention Facility PAQ states apart from reporting to the designated supervisors or officials and designated State or local service agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 24-25, section 115.361- Staff and agency reporting duties; Reporting of allegations, Policy (c), states, “Apart from reporting to designated supervisors or officials and designated State or local services agencies, staff shall be prohibited from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in MCDF policy, to make treatment, investigation, and other security and management decisions.”

(d) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 25, section 115.361- Staff and agency reporting duties; Reporting of allegations, Policy (d) 1-2, state,

(d)(1) “Medical and mental health practitioners shall be required to report sexual abuse to designated supervisors and officials pursuant to paragraph (a) of this section, as well as to the designated State or local services agency where required by mandatory reporting laws.

(2) Such practitioners shall be required to inform youth at the initiation of services of their duty to report and the limitations of confidentiality.”

(e) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility,

	page 24, section 115.361- Staff and agency reporting duties; Reporting of allegations, Policy (e) 1-3, states, (e)(1) "Upon receiving any allegation of sexual abuse, the facility head or his or her designee shall promptly report the allegation to the appropriate agency office and to the alleged victim's parents or legal guardians, unless the facility has official documentation showing the parents or legal guardians should not be notified. (2) If the alleged victim is under the guardianship of the child welfare system, the report shall be made to the alleged victim's caseworker instead of the parents or legal guardians. (3) If a juvenile court retains jurisdiction over the alleged victim, the facility head or designee shall also report the allegation to the juvenile's attorney or other legal representative of record within 14 days of receiving the allegation." (f) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 25, section 115.361- Staff and agency reporting duties; Reporting of allegations, Policy (f), states, "MCDF shall report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators." Based on documentation review, interviews, and site observations, the facility exceeds compliance with this standard. Although agency policy requires notifications within 14 days, interviews demonstrated the facility routinely completes all required external notifications the same day an allegation is received. The Unit Manager further demonstrated parents and guardians are encouraged to meet with facility staff to discuss the incident, are offered daily visitation opportunities to accommodate family schedules, and court officials are provided flexible access to youth. Collectively, these practices demonstrate a proactive approach to communication and family involvement that exceeds the minimum requirements of the standard.
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115.362	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility,

dated 5.2023

Interviews:

1. Under Sheriff

The interview with the Undersheriff demonstrated the PREA Risk Assessment is completed during the classification of the inmate and is utilized to determine the best housing assignment. The detention center does not house known or potential victims with known or potential aggressors. Each housing unit utilizes a housing flowchart to guide housing decisions based on the PREA Risk Assessment. The assessment is reevaluated within 30 days of the inmate's intake. Classification Officers use the information to determine housing assignments and document them within the facility's Records Management System (RMS). The PREA Coordinator reviews the updated information, provides the 30-day inmate education, and runs a daily report to verify housing assignments for inmates identified as potential victims or aggressors. This process allows staff to identify and promptly correct any inappropriate housing assignments.

(a) The Missoula County Juvenile Detention Facility PAQ states when the agency or facility learns that a resident is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the resident (i.e., it takes some action to assess and implement appropriate protective measures without unreasonable delay). In the past 12 months, the number of times the agency or facility has determined that a resident was subject to a substantial risk of imminent sexual abuse was zero.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 26, section 115.362- Facility protection duties, Procedure, states, “All youth will complete a Risk Assessment at intake to determine housing classification. MCDF will not house known or potential victims with known or potential aggressors. Staff will follow PREA Incident Response Flowchart and Checklist.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 26, section 115.362- Facility protection duties, Policy states, “When MCDF learns that a youth is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the youth.”

Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.363	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard Auditor Discussion Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 Interviews: 1. Jail Commander 2. Under Sheriff The interview with the Jail Commander and the Undersheriff demonstrated both were aware that upon receiving an allegation an inmate was sexually abused while confined at another facility, they are responsible for notifying the head of the facility or appropriate office where the alleged abuse occurred. Both stated they would ensure the allegation is documented, appropriate notifications are made, and maintain communication with the receiving agency, as appropriate. The Undersheriff further stated the facility has not received any reports within the past 12 months involving inmates alleging sexual abuse while confined at another facility. He also stated that the last report received was in 2024, the facility received notification from another agency regarding an allegation of sexual abuse reported to have occurred at the Missoula County Detention Facility. The allegation was investigated and determined to be unfounded. Site Observations: Documentation and interviews demonstrated the facility had not received any allegations during the audit period involving inmates reporting sexual abuse while confined at another facility. (a) The Missoula County Juvenile Detention Facility PAQ states the agency has a policy requiring that, upon receiving an allegation that a resident was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. The agency’s policy also requires that the head of the facility notify the appropriate investigative agency. In the past 12 months, the facility has received zero allegations that a resident was abused while in confinement at another facility. The PAQ states, “If there is a report, MCJDF would

immediately report to/notify the shift supervisor, who would relay the information to the Commander. She would then contact the head of the agency where the alleged abuse occurred no later than 72 hours receiving the report.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 2, section 115.363- Reporting to other confinement facilities, Procedure, states, “If any youth at intake reports being sexually abused in another facility, staff will immediately notify the supervisor who will relay the information to the Commander. The Commander will then contact the head of the facility of the agency where the alleged abuse occurred and shall notify the appropriate investigative agency. Notification will be made no later than 72 hours after receiving the allegation and will be documented.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 26, section 115.363- Reporting to other confinement facilities, Policy (a), states, “To ensure that allegations of custodial sexual abuse that are reported to any facility are timely investigated by the facility where the abuse allegedly occurred. The intent of the standard is to urge facility heads to send the notification to an individual or office that will ensure the facility takes immediate steps to investigate the allegation appropriately and promptly. It is important that the person receiving the report of sexual abuse at the facility understands the seriousness and gravity of the allegation, and that the communication originated at the highest level of the reporting facility.

(a) Upon receiving an allegation that a youth was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred and shall also notify the appropriate investigative agency.”

(b) The Missoula County Juvenile Detention Facility PAQ states agency policy requires that the facility head provides such notification as soon as possible, but no later than 72 hours after receiving the allegation.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 26, section 115.363- Reporting to other confinement facilities, Policy (b), states, “Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.”

	(c) The Missoula County Juvenile Detention Facility PAQ states the facility documents that it has provided such notification within 72 hours of receiving the allegation. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 26, section 115.363- Reporting to other confinement facilities, Policy (c), states, “MCDF will document that it has provided such notification.” (d) The Missoula County Juvenile Detention Facility PAQ states facility policy requires that allegations received from other agencies or facilities investigated in accordance with the PREA standards. In the last 12 months, there have been zero allegations of sexual abuse the facility received from other facilities. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 26, section 115.363- Reporting to other confinement facilities, Policy (d), states, “The facility head that receives such notification shall ensure that the allegation is investigated in accordance with these standards.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.364	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 3. Missoula County Detention Facility PREA First Responder Flow Chart, not dated Interviews: 1. Detention Officers

Interviews with facility personnel demonstrated each was aware of their first responder responsibilities, including separating the parties involved, encouraging the victim not to shower, brush their teeth, change clothing, use the restroom, or otherwise destroy potential evidence, and instructing the alleged perpetrator not to engage in those same actions. Staff further stated the area where the incident occurred would be secured to prevent entry until released by investigative or administrative personnel. Employees consistently emphasized the importance of acting immediately and "doing the right thing at the right time for the right reason" to preserve the integrity of the investigation.

(a) The Missoula County Juvenile Detention Facility PAQ states the agency has a first responder policy for allegations of sexual abuse. The policy requires that, upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to separate, preserve, protect, collect physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. In the past 12 months, zero allegations occurred where a resident was sexually abused.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 27, section 115.364- Staff first responder duties, Policy, states, “To ensure that the first security staff member to respond to an allegation or report of sexual abuse will address the victims’ immediate safety and maintain security and control over the crime scene so that any physical evidence is preserved until an investigator arrives. Investigators will then have access to evidence that has not been accidentally or negligently compromised or destroyed, which will safeguard the quality of the investigation.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 27, section 115.364- Staff first responder duties, Procedure 1-4, states, ““The first staff member to respond to an incident shall be required to:

1. Separate the alleged victim and abuser.
2. Preserve and protect the scene until appropriate steps can be taken to collect any evidence. (Follow PREA Incident Response Flowchart and Checklist)
3. If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.
4. If the abuse occurred within a time period that still allows for collection of physical evidence, ensure that the alleged abuser does not take any actions that

	could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. (a) If the first staff responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff. The facility provided a Missoula County Detention Facility PREA First Responder Flow Chart. The flow chart demonstrates clear direction for the first responder to: · Separate the alleged victim and abuser - o Assess the victims' acute medical needs - o Inform the victim of his or her rights - o Explain the need for a forensic exam - o Offer outside victim advocate - o MCDF Mental Health provide crisis intervention counseling - o Provide for any special needs the victim may have · Preserve and protect the scene · Collect physical evidence · Request the alleged abuser and victim don't take any actions that could destroy physical evidence (b) The Missoula County Juvenile Detention Facility PAQ states the facility's' policy requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and notify security staff. Of the allegations that a resident was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder was zero. Policy compliance can be found in provision (a) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.365	Coordinated response
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Missoula County Juvenile Detention Facility PAQ
2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023
3. Missoula County Detention Facility Coordinated Response, dated 5.18.2023

Interviews:

1. Jail Commander

The interview with the Jail Commander demonstrated all employees have access to the Coordinated Response Plan through the agency's shared G-Drive.

Site Observations:

Review of the facility's Coordinated Response Plan demonstrated clear direction to staff regarding their responsibilities in response to allegations of sexual abuse and sexual harassment. Coordinated Response Flow Charts were observed in a housing unit control booth, ensuring staff have immediate access to first responder responsibilities and reporting procedures.

(a) The Missoula County Juvenile Detention Facility PAQ states the facility developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 27, section 115.365 Coordinated Response, Policy, states, “MCDF will develop a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership. “

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 27-28, section 115.365 Coordinated Response, Procedure 1-8, states, “MCDF first responders will follow the PREA Incident Response Flowchart and Checklist and requirements of PREA Standard 115.364.

	At a minimum, the following is to be determined in the plan: 1. Assessment of the victim's acute medical needs. 2. Informing the victim of his or her rights under relevant Federal or State law. 3. Explanation of the need for a forensic medical exam and offering the victim the option of undergoing one. 4. Offering the presence of a victim advocate or a qualified staff member to be present during the exam. 5. Providing crisis intervention counseling. 6. Interviewing the victim and any witnesses. 7. Collecting evidence. 8. Providing for any special needs the victim may have.” The facility provided a PREA Coordinated Response demonstrating the following instruction is outlined for departments responding to an incident of sexual harassment or sexual abuse. · First Responders · Unit Manager · Shift Supervisor · Deputies from the Missoula County Sheriff’s Office · Medical · Mental Health Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.366	Preservation of ability to protect residents from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

1. Missoula County Juvenile Detention Facility PAQ
2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023
3. Agreement between the County of Missoula and Association of Federal, State, County and Municipal Employees (AFSCME) Detention Officers, Association of Missoula County, term of contract 7.1.2025 – 6.30.2027

Interview:

1. Under Sheriff

The interview with the Undersheriff demonstrated there is no language in either contract that restricts or limits the agency's ability to remove staff sexual abusers from contact with inmates pending the outcome of an investigation or appropriate disciplinary action. He further stated agency policy, §610.37, specifically provides that the Missoula County Detention Facility will ensure collective bargaining agreements, contracts with other entities, or voluntary policies do not limit the agency's ability to remove alleged staff, contractors, or volunteer sexual abusers from contact with inmates pending the outcome of an investigation or a determination of whether and to what extent disciplinary action is warranted.

(a) The Missoula County Juvenile Detention Facility PAQ states the agency, facility, or any other governmental entity responsible for collective bargaining on the agency's behalf has entered into or renewed any collective bargaining agreement or other agreement since August 20, 2012, or since the last PREA audit, whichever is later.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 28, section 115.366 Preservation of ability to protect inmates from contact with abusers, Policy, states, “To help prevent staff sexual abuse and foster a culture of reporting, recognizing that: Youth are more likely to report sexual abuse when MCDF is able to protect them from further abuse and when staff are held accountable for engaging in sexual abuse; and holding staff accountable for committing sexual abuse discourages future abuse. To ensure that employee collective bargaining agreements do not present a barrier to MCDF's ability to protect youth from contact with alleged sexual abusers during investigations or hinder an agency's ability to discipline staff who have been found to have engaged in sexual abuse of youth.”

	Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 28, section 115.366 Preservation of ability to protect inmates from contact with abusers, Procedure, states, “MCDF will ensure that the Detention Officer contract with Missoula County collective bargaining unit will not limit the agency’s ability to remove alleged staff sexual abusers from contact with youth pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.” The facility provided an Agreement between the County of Missoula and the Association of Federal, State, County and Municipal Employees (AFSCME) Detention Officers, Association of Missoula County. Page three, Article 5: Management Rights, subsection six, states, “take whatever actions may be necessary to carry out the missions of the agency in situations of emergency,” demonstrating that employees may be relieved of duty when not adhering to agency expectations and mission. The contract appears to be currently implemented, as evidenced by Commissioner signatures, and reflects a contract term of 7.1.2025 – 6.30.2027. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.367	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 3. Missoula County Detention Facility PREA Monitoring Form, dated 3.2022 Interviews: 1. PREA Coordinator The interview with the PREA Coordinator demonstrated she meets with alleged

victims on the day a sexual abuse allegation is received and continues to meet with them face-to-face at least monthly for 90 days. She stated each meeting is documented while she monitors for retaliation, to include changes in inmate or staff behavior, frivolous housing changes, disciplinary reports, and any other indicators of retaliation, while ensuring the inmate continues to feel safe.

(a) The Missoula County Juvenile Detention Facility PAQ states the agency has a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff. The agency designates the PREA Coordinator as the retaliation monitoring.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 29, section 115.367 Facility protection against retaliation, Procedure, states, “MCDF will protect all youth and staff who report sexual abuse or sexual harassment from retaliation by other youth and staff. The PREA Compliance Coordinator will monitor retaliation for at least 90 days following a report of sexual abuse using the retaliation form. MCDF will offer all staff members who fear retaliation emotional support services through the Employee Assistance Program. “

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 28, section 115.367 Facility protection against retaliation, Policy (a), states, “Youth, staff, contractors, volunteers, or third-party reporters who choose to file a report of sexual abuse or sexual harassment, or cooperate with an investigation, shall not be subject to any form of retaliation related to the reporting of or participation in an investigation of such.

(a) MCDF will protect all youth and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other youth or staff and shall designate which staff members or departments are charged with monitoring retaliation.”

The facility provided a Missoula County Detention Facility PREA Monitoring form. The form documents the following information.

- Basic Information
 - o PREA Incident #: / Facility: Adult or Juvenile
 - o Type of Allegation / Allegation Date
 - o Monitoring Begin Date / Monitoring Expiration Date

- o Alleged Victim Being Monitored and Global #:
- o Staff / Inmate Witness Being Monitored and Global # / Employee ID#
- In Person Status Check / Date / Person Monitoring
- o Face to Face Contact
- o Reviewed Program Changes
- o Reviewed Disciplinary Reports
- o Reviewed Employee Evaluation
- o Reviewed Shift Change
- o Reviewed Housing Changes
- o File Grievance
- o Reviewed Employee Evaluations

(b) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 28, section 115.367 Facility protection against retaliation, Policy (b), states, “MCDF will employ multiple protection measures, such as housing changes or transfers for youth victims or abusers, removal of alleged staff or youth abusers from contact with victims, and emotional support services for youth or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.”

(c) The Missoula County Juvenile Detention Facility PAQ states the agency/facility monitors the conduct or treatment of residents or staff who reported sexual abuse and of residents who were reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation by residents or staff. MCJDF shall continue such monitoring beyond 90 if the initial monitoring indicates a continuing need was zero. The PAQ states, “MCJDF shall continue such monitoring beyond 90 if the initial monitoring indicates a continuing need.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 2, section 115.367 Facility protection against retaliation, Policy (c), states, “For at least 90 days following an allegation of sexual abuse, MCDF will monitor the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff and shall act promptly to remedy any such retaliation. Items MCDF should monitor include any

	inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. MCDF shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need.” (d) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 29, section 115.367 Facility protection against retaliation, Policy (d), states, “In the case of youth, such monitoring shall also include periodic status checks.” (e) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 29, section 115.367 Facility protection against retaliation, Policy (e), states, “If any other individual who cooperates with an investigation expresses a fear of retaliation, the MCDF shall take appropriate measures to protect that individual against retaliation.” (f) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 29, section 115.367 Facility protection against retaliation, Policy (f), states, “MCDF’s obligation to monitor shall terminate if the agency determines that the allegation is unfounded.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.368	Post-allegation protective custody
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 Interviews: 1. Jail Commander

The interview with the Jail Commander demonstrated protective custody is never utilized solely to protect vulnerable inmates and is only considered when there is an immediate and substantial safety concern or upon an inmate's request. She further stated she could not recall any instance during the past 12 months in which protective custody was required for this purpose. The Jail Commander explained victims are kept separate from their perpetrators by documenting housing restrictions within the inmate contact notes, creating a clear record of the required separation and ensuring staff throughout the facility are aware of the housing limitations.

(a) The Missoula County Juvenile Detention Facility PAQ states the facility has a policy that residents who allege to have suffered sexual abuse may only be placed in isolation as a last resort if less restrictive measures are inadequate to keep them and other residents safe, and only until an alternative means of keeping all residents safe can be arranged. The number of residents who allege to have suffered sexual abuse who were placed in isolation in the past 12 months was zero.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 28, section 115.368 - Post-allegation protective custody, Policy, states, “To ensure that facilities do not automatically, or routinely involuntarily segregate youth alleged to have suffered sexual abuse or restrict their access to programming or other available activities, recognizing that any form of involuntary segregation and restrictions to programming or other privileges can be experienced as punitive by youth.

To ensure that youth at high risk for or who have alleged to have suffered sexual abuse are not placed in involuntary segregated housing unless no available alternative means of separation from likely abusers exists. The standard further intends that segregated youth have access to programs, education, and work opportunities to the extent possible and requires MCDF to document any limitations on these rights and periodically afford the youth with a review to determine the continuing need for separation.

Any use of segregated housing to protect a youth who is alleged to have suffered sexual abuse shall be subject to the requirements of § 115.342.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 30, section 115.368 - Post-allegation protective custody, Procedure, states, “MCDF will not isolate any youth who are at high risk for or who have alleged to have suffered sexual abuse, unless it is a last resort when less restrictive measures are inadequate to keep them and other youth safe, and then only until an alternative means of keeping all youth safe can be arranged. During any period of isolation, MCDF shall not deny youth daily large-muscle exercise and any legally

	required educational programming or special education services. Youth in isolation shall receive daily visits from a medical or mental health care clinician. Youth shall also have access to other programs and work opportunities to the extent possible. The youth will be re-assessed every 30 days and staffed during the weekly Inmate Managing Plan meeting. “ Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. The Jail Commander demonstrated protective custody is not utilized as a routine response for vulnerable inmates or inmates alleging sexual abuse and could not recall a situation during the past 12 months in which protective custody was required for that purpose. Rather than relying on restrictive housing, the facility demonstrated victims are protected through documented housing limitations entered into inmate contact notes, ensuring separation requirements are immediately communicated to staff throughout the facility. Documentation further demonstrated the agency has established multiple safeguards to prevent unnecessary placement in protective custody, including completion of a PREA Victim Housing Preference Form prior to any housing change, daily housing discussions when requested by the inmate, continued access to programs and work opportunities whenever possible, documentation of any restrictions imposed, 30-day reassessments, and weekly review through the Inmate Managing Plan meeting. Collectively, interviews, documentation, and observations demonstrated the facility has established a comprehensive, inmate-centered process that prioritizes individualized safety planning while minimizing the use of restrictive housing.
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115.371	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 Interviews: 1. Targeted Youth 2. Detective Lieutenant / Investigator

The interview with one youth who reported sexual abuse that occurred while residing in a foster home in another state and sexual abuse that occurred within the local community demonstrated she completed a forensic interview through the First Step advocacy agency.

The interview with the Investigator demonstrated his investigative process includes securing the crime scene, gathering statements, interviewing all involved parties and witnesses, remaining sensitive to the trauma experienced by victims and staff, and collecting all available evidence. He further stated the decision to utilize Miranda or Garrity warnings is based on the nature of the allegation.

Site Observations:

Review of investigations utilizing the PREA Audit – Juvenile Facilities Documentation Review – Investigations template demonstrated both administrative investigations reviewed were completed thoroughly, timely, and in compliance with all applicable requirements of the standard.

(a) The Missoula County Juvenile Detention Facility PAQ states the agency/facility has a policy related to criminal and administrative agency investigations.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 31, section Procedure, states, “Investigations of sexual abuse will be referred to the Missoula County Sheriff’s Office. Deputies who respond for investigation will have completed special training in sexual abuse investigations pursuant to § 115.34. Administrator investigations will use the PREA Checklist form and document in a written report. The final report will be submitted to the PREA Compliance Coordinator. “

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 30, section Policy (a), states, “MCDF will ensure that all allegations of sexual abuse and sexual harassment are investigated thoroughly and properly so that incidents are substantiated when they should be, both to deter these incidents and to increase reporting.

(a) When MCDF conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.”

(b) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 30, section Policy (b), states, “Where sexual abuse is alleged, MCDF shall use investigators who have received special training in sexual abuse investigations pursuant to § 115.34.”

(c) Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 30, section Policy (c), states, “Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.”

(d) The Missoula County Juvenile Detention Facility PAQ states the agency does not terminate an investigation solely because the source of the allegation recants the allegation.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 30, section Policy (m), states, “MCDF shall not terminate an investigation solely because the source of the allegation recants the allegation.”

(i) The Missoula County Juvenile Detention Facility PAQ states substantiated allegations of conduct that appear to be criminal are referred for prosecution. The number of substantiated allegations of conduct that appear to be criminal that were referred for prosecution since August 20, 2012, or since the last PREA audit, whichever is later was zero.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 31, section Policy (h), states, “Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution.”

(j) The Missoula County Juvenile Detention Facility PAQ states the agency retains all written reports pertaining to administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 31, section Policy (i), states, “The MCDF shall retain all written reports

	referenced in paragraphs (f) and (g) of this section for as long as the alleged abuser is incarcerated or employed by MCDF, plus five years.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.372	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 Interviews: 1. Detective Lieutenant / Investigator The interview with the Investigator demonstrated administrative investigations are conducted to determine whether allegations of sexual abuse or sexual harassment are substantiated based on the evidence obtained during the investigation. He further stated criminal investigations are conducted in accordance with applicable legal requirements and that probable cause is required before criminal charges are pursued. (a) The Missoula County Juvenile Detention Facility PAQ states the agency imposes a standard of a preponderance of the evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 31, section 115.372 Evidentiary standard for administrative investigations, Procedure, states, “MCDF will impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. MCDF will utilize the PREA Checklist to ensure investigations are being conducted properly and a post investigation review will

	take place within 30 days of the determination.” Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 31, section 115.372 Evidentiary standard for administrative investigations, Policy, states, “To ensure that all administrative investigations into allegations of sexual abuse and sexual harassment use the correct standard of proof – a preponderance of the evidence, which means the greater weight of the evidence. Using the proper evidentiary standard enables an agency to substantiate actual incidents of sexual abuse and sexual harassment in non-criminal investigations. Consistent, properly done investigations into allegations, including using the appropriate evidentiary standard, will increase the chances that consequences will follow substantiated reports of sexual abuse and sexual harassment while also encouraging reporting and deterring further abuse.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.373	Reporting to residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 3. Missoula County Detention Facility Juvenile PREA Post Investigation Resident Notification, dated 4.27.2022 Interviews: 1. PREA Coordinator The interview with the PREA Coordinator demonstrated inmates are notified verbally and in writing of investigative outcomes by documenting the notification on the Post Investigation Resident Notification form and uploading the completed form into the New World Jail Management System.

(a) The Missoula County Juvenile Detention Facility PAQ states the agency has a policy requiring that any resident who makes an allegation that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency. The number of criminal and/or administrative investigations of alleged resident sexual abuse that were completed by the agency/facility in the past 12 months was seven.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 32, section 115.373- Reporting to youth, Procedure, states, “Staff on Youth Allegations: Following an investigation into a youth’s allegation of sexual abuse suffered at the MCDF, the youth will be informed as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. If the investigation was completed by the Missoula County Sheriff’s Department, MCDF will request the relevant information in order to inform the youth. Following a youth’s allegation that a staff member has committed sexual abuse against the youth, MCDF will inform the youth (unless the program has determined that the allegation is unfounded) whenever: The staff member is no longer posted within the youth’s unit; The staff member is no longer employed at MCDF; The staff member has been indicted on a charge related to sexual abuse within the agency; or The staff member has been convicted on a charge related to sexual abuse within the agency.

Youth on Youth Allegations: Following a youth’s allegation that he or she has been sexually abused by another youth, MCDF will inform the alleged victim whenever: The alleged abuser has been indicted on a charge related to sexual abuse within the program; or the alleged abuser has been convicted on a charge related to sexual abuse within MCDF. All such notifications or attempted notifications shall be provided to the youth in writing on a “Post Allegation Youth Notification Response Form” by the PREA Compliance Coordinator (or designee) and be kept in the youth file.

Note: Obligation to report outcomes to the youth shall terminate if the youth is released from the agency.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 31, section 115.373- Reporting to inmates, Policy, states, “To ensure facilities increase the likelihood that youth will report incidents of sexual abuse, by ensuring that their reports will be taken seriously and fully investigated. Youth may not be aware of the steps an agency will take to address a report of sexual abuse, and informing youth of the results of investigations will, at a minimum, let the youth

know that the report has been addressed and investigated.”

(b) The Missoula County Juvenile Detention Facility PAQ states this provision is not applicable as the agency conducts both administrative and criminal investigations.

(c) The Missoula County Juvenile Detention Facility PAQ states following a resident’s allegation that a staff member has committed sexual abuse against the resident, the agency/facility subsequently does inform the Resident (unless the agency has determined that the allegation is unfounded) whenever:

- The staff member is no longer posted within the Resident’s unit;
- The staff member is no longer employed at the facility;
- The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
- The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.”

(d) The Missoula County Juvenile Detention Facility PAQ states following a resident’s allegation that he or she has been sexually abused by another resident in an agency facility, the agency subsequently informs the alleged victim whenever: the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. Policy compliance can be found in provision (a) of this standard.

The facility provided a Missoula County Detention Facility PREA Post Investigation Resident Notification. This notification documents the following:

- Recipient of Notice/Date of Notification
- Nature of Allegation
- Allegation Category
- Name of Agency if investigation included outside agency
- Date Investigation began and ended
- Finding of investigation
- Sanction imposed – unless unfounded

	· Suspect (staff or Youth) removed from Resident's unit · Staff Suspect no longer employed · Resident Suspect no longer in program · Suspect (staff or Youth) indicted · Suspect (staff or Youth) convicted · Resident Signature/Date/Time · Unit Manager printed name/signature/date · PREA Coordinator printed name/signature/date (e) The Missoula County Juvenile Detention Facility PAQ states the agency has a policy that all notifications to residents described under this standard are documented. In the past 12 months, there has been seven notifications to a resident, pursuant to this standard. Of those notifications made in the past 12 months, the number that were documented was zero. Policy compliance can be found in provision (a) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.376	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 Interviews: 1. Jail Commander The interview with the Jail Commander demonstrated the agency maintains full

authority to impose disciplinary action for violations of agency sexual abuse or sexual harassment policies. She stated staff who engage in prohibited conduct would no longer be employed by the facility when warranted by the outcome of the investigation and disciplinary process.

Site Observations:

Documentation and interviews demonstrated the facility had no staff who violated agency sexual abuse or sexual harassment policies during the previous 12 months.

(a) The Missoula County Juvenile Detention Facility PAQ states staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 33, section 115.376- Disciplinary sanctions for staff, Procedure, states, “MCDF staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse. Disciplinary sanctions for violations of program policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member’s disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. All terminations for violations of program sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant social service agencies.

Any MCDF staff member under investigation for sexual abuse will be placed on administrative leave pending the investigation to eliminate contact between the youth and the abuser.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 32, section 115.376- Disciplinary sanctions for staff, Policy, states, “To protect youth from staff sexual abuse and sexual harassment, and to hold staff accountable for violating agency sexual abuse or sexual harassment policies. Appropriate and measured disciplinary sanctions for staff demonstrate MCDF’s commitment to sexual safety. Uniform and consistently applied discipline that is commensurate with the nature and circumstances of the acts committed, the staff member’s disciplinary history, and sanctions imposed for comparable offenses help create an environment

	that encourages staff to follow agency policies thus deterring staff sexual abuse and sexual harassment.” (b) The Missoula County Juvenile Detention Facility PAQ states in the last 12 months, there has been zero staff from the facility that had violated agency sexual abuse or sexual harassment policies. In the past 12 months, the number of staff from the facility who have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies is zero. (c) The Missoula County Juvenile Detention Facility PAQ states disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member’s disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. In the past 12 months there have zero staff requiring discipline for sexual abuse or sexual harassment. Policy compliance can be found in provision (a) of this standard. (d) The Missoula County Juvenile Detention Facility PAQ states all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. In the past 12 months, zero staff have been terminated for sexual abuse or harassment. Policy compliance can be found in provision (a) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.377	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility,

dated 5.2023

Interviews:

1. Jail Commander

The interview with the Jail Commander demonstrated any volunteer or contractor who engages in sexual abuse or sexual harassment would be immediately removed from the facility, reported to law enforcement, and referred to any applicable licensing or certifying agencies, as appropriate.

Site Observations:

Documentation and interviews demonstrated the facility had no volunteers or contractors who violated agency sexual abuse or sexual harassment policies during the previous 12 months.

(a) The Missoula County Juvenile Detention Facility PAQ states agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. Agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with residents. In the past 12 months, there have been zero contractors or volunteers reported to law enforcement or relevant licensing bodies for engaging in sexual abuse of residents.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 33, section 115.377- Corrective action for contractors and volunteers, Procedure, states, “Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with youth and shall be reported to law enforcement agencies and social service agencies unless the activity was clearly not criminal. MCDF will take appropriate corrective measures and will consider whether to prohibit further contact with youth, in the case of any violations of agency sexual abuse or sexual harassment policies by a contractor or volunteer. “

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 33, section 115.377- Corrective action for contractors and volunteers, Policy, states, “To protect youth from sexual abuse and sexual harassment from contractors and volunteers, and to hold contractors and volunteers accountable for violating agency sexual abuse or sexual harassment policies. Consistent and meaningful corrective actions demonstrate MCDF’s commitment to sexual safety, and ensure that contractors and volunteers follow agency policies, thus deterring sexual abuse and sexual harassment of youth in the facility.”

	(b) The Missoula County Juvenile Detention Facility PAQ states the facility takes appropriate remedial measures and considers whether to prohibit further contact with residents in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. Policy compliance can be found in provision (a) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.378	Interventions and disciplinary sanctions for residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 Interviews: 1. Jail Commander The interview with the Jail Commander demonstrated inmates who sexually abuse other inmates are afforded the disciplinary process and due process protections prior to the imposition of disciplinary sanctions. She further stated inmates are reassessed following the incident, and referrals to medical, mental health, advocacy, and other appropriate services are made as needed, with weekly follow-up visits conducted to monitor their well-being. (a/c) The Missoula County Juvenile Detention Facility PAQ states residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for resident-on-resident sexual abuse. Residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for resident-on-resident sexual abuse. In the past 12 months there have been zero administrative findings of resident-on-resident sexual abuse have occurred at the facility.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 34, section 115.378- Interventions and disciplinary sanctions for inmates, Policy, states, “To ensure that youth are held accountable for youth-on-youth sexual abuse through a formal disciplinary process that provides appropriate and measured sanctions commensurate with the nature and circumstances of the abuse, the youth’s disciplinary history and sanctions imposed for comparable offenses by youth with similar histories. Imposing consistent disciplinary sanctions demonstrates agency and facility commitment to sexual safety and helps deter sexual abuse. The disciplinary process considers factors such as mental capacity, intent, and what resources or supports can be offered to the inmate abuser to support rehabilitation.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 33-34, section 115.378- Interventions and disciplinary sanctions for inmates, Procedure, states, “MCDF promotes a safe environment with established rules that are designed to protect the youth and staff. Youth shall understand the program rules, as well as the consequences for not meeting them. Rule violations shall be addressed through a consistent and fair process as outlined in the Inmate Information and Rule Book.

A youth will be subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that the youth engaged in youth-on-youth sexual abuse or following a criminal finding of guilt for youth-on-youth sexual abuse.

Any disciplinary sanctions will be commensurate with the nature and circumstances of the abuse committed, the youth’s disciplinary history, and the sanctions imposed for comparable offenses by other youth with similar histories. In the event a disciplinary sanction results in the isolation of a youth, MCDF will not deny the youth daily large- muscle exercise or access to any legally required educational programming or special education services. Youth in isolation shall receive daily visits from a medical or mental health care clinician. Youth shall also have access to other programs and work opportunities to the extent possible.

The disciplinary process shall consider whether a youth’s mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

MCDF will discipline a youth for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

MCDF will not issue disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation.

All sexual activity between youth is prohibited and may result in Level 2 disciplinary action as outlined in the Inmate Information and Rule Book (series #4203)."

(b) The Missoula County Detention Facility Center PAQ states in the event a disciplinary sanction for resident-on resident sexual abuse results in the isolation of a resident, the facility policy requires that residents in isolation have daily access to large muscle exercise, legally required educational programming, and special education services. In the event a disciplinary sanction for resident-on-resident sexual abuse results in the isolation of a resident, residents in isolation receive daily visits from a medical or mental health care clinician. In the past 12 months, the number of residents placed in isolation as a disciplinary sanction for resident-on-resident sexual abuse was zero. Policy compliance can be found in provision (a) of this standard.

(d) The Missoula County Juvenile Detention Facility PAQ states the facility does offer therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. However, the facility does not require participation as a condition of access to programming or other benefits.

(e) The Missoula County Juvenile Detention Facility PAQ states the agency disciplines residents for sexual contact with staff only upon finding that the staff member did not consent to such contact. Policy compliance can be found in provision (a) of this standard.

(f) The Missoula County Juvenile Detention Facility PAQ states the agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation. Policy compliance can be found in provision (a) of this standard.

(g) The Missoula County Juvenile Detention Facility PAQ states the agency prohibits all sexual activity between residents. If the agency prohibits all sexual activity between residents and disciplines residents for such activity, the agency deems

	such activity to constitute sexual abuse only if it determines that the activity is coerced. Policy compliance can be found in provision (a) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.381	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 3. Missoula County Detention Facility 14 Day Mental Health Tracker, not dated Interviews: 1. Random Inmates 2. Targeted Youths 3. Mental Health Coordinator 4. Health Services Coordinator Interviews with inmates demonstrated they were offered mental health services during the intake process and throughout their confinement at the facility. Interviews with medical and mental health practitioners demonstrated disclosures of prior sexual victimization or abusiveness identified during the risk assessment process, through collateral information, or by inmate report are referred for medical and mental health follow-up, when accepted by the inmate. Site Observations: Review of inmate files demonstrated disclosures of prior sexual victimization or abusiveness were documented, and offers of medical and/or mental health follow-up

services were documented, as applicable.

(a) The Missoula County Juvenile Detention Facility PAQ states all residents at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.341 are offered a follow-up meeting with a medical or mental health practitioner. Follow up meetings are offered within 14 days of the intake screening. In the past 12 months 100% residents who disclosed prior victimization during the intake screening were offered a follow-up meeting with a medical or mental health provider. Medical and mental health staff maintain secondary materials, documenting compliance with the above required services.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 35, section 115.381- Medical and mental health screenings; History of sexual abuse; Information Management, Policy, states, “To require a facility to timely address any medical, mental health, or security needs concerning youth who have experienced or perpetrated prior sexual abuse, either in a confinement setting or in the community. Identifying and offering treatment to youth with prior victimization is intended to address immediate mental health needs. Identifying and offering a follow-up meeting with a mental health practitioner to prior abusers has the potential to reduce future incidents of sexual abuse and create an improved overall sense of safety within MCDF.

To ensure that a facility that receives information related to sexual victimization or abusiveness that occurred in an institutional setting limits access to those individuals with a need to know and ensures informed consent regarding the release of information about prior sexual victimization in the community. Protecting the confidentiality of youth information is essential to increase youth confidence and trust in the system of reporting, investigation, and treatment.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 35, section 115.381- Medical and mental health screenings; History of sexual abuse; Information Management, Procedure, states, If the screening pursuant to PREA Standard 115.341 indicates that a youth has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, MCDF will ensure that the youth is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.

If the screening pursuant to PREA Standard 115.341 indicates that a youth has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, MCDF shall ensure that the youth is offered a follow-up

meeting with a mental health practitioner within 14 days of the intake screening.

Any information related to sexual victimization or abusiveness that occurred in an institutional setting will be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform security and management decisions, including housing, bed, work, education, or as otherwise required by Federal, State, or local law.

Medical and mental health practitioners will obtain informed consent from youth before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the youth is under the age of 18.

MCDF will conduct a mental health evaluation of all known youth on youth abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by qualified mental health practitioners (115.383)."

(b) The Missoula County Juvenile Detention Facility PAQ states all residents who have ever previously perpetrated sexual abuse are offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. In the past 12 months 100% residents who disclosed previously perpetrated sexual abuse, as indicated during the screening process. Policy compliance can be found in provision (a) of this standard.

The facility provided a Missoula County Detention Facility 14 Day Mental Health Tracker. This form documents the following.

- See by
- Unit
- Name
- Reason for Referral
- Referral type
- Date referred
- Date Seen
- MHP

	· Additional Notes (c) The Missoula County Juvenile Detention Facility PAQ states information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners. Policy compliance can be found in provision (a) of this standard. (d) The Missoula County Juvenile Detention Facility PAQ states medical and mental health practitioners obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18. Policy compliance can be found in provision (a) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.382	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 Interviews: 1. Mental Health Coordinator 2. Health Services Coordinator Interviews with facility personnel demonstrated inmates are provided access to emergency medical and mental health services. Staff stated medical and mental health personnel are immediately notified upon receipt of an allegation of sexual abuse.

The interview with the Health Services Coordinator demonstrated First Step provides emergency medical and mental health services to victims of sexual abuse. She stated services are initiated upon the inmate's arrival at First Step, where forensic evidence collection, when appropriate, is completed by qualified medical personnel.

(a-b) The Missoula County Juvenile Detention Facility PAQ states resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment. Medical and mental health staff maintain secondary materials (e.g., form, log) documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services concerning contraception and sexually transmitted infection prophylaxis. The PAQ states, "Wellpath medical and mental health staff maintain several types of documentation for the variety of medical and mental health services offered throughout the facility."

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 36, section 115.382- Inmate access to emergency medical and mental health services, Policy, states, "Victims of sexual assault in a facility will have access to emergency medical and mental health services."

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 36, section 115.382- Inmate access to emergency medical and mental health services, Procedure, states, "Youth victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment.

If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, staff first responders shall take preliminary steps to protect the victim pursuant to § 115.362 and will immediately notify the appropriate medical and mental health practitioners.

Youth victims of sexual abuse while at MCDF will be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

	Mental health and medical services will be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. A written MOU has been established for outside services for emergency medical and mental health services.” The facility provided a Memorandum of Understanding between Missoula County Detention Center and First Step Resource Center at Providence St. Patrick Hospital. The memorandum appears to be current with no obvious expiration date and is signed by the Jail Commander and the First Step Clinical Supervisor. (c) The Missoula County Juvenile Detention Facility PAQ states resident victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. Policy compliance can be found in provision (a) of this standard. (d) The Missoula County Juvenile Detention Facility PAQ states Treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Policy compliance can be found in provision (a) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.383	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ

2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023

Interviews:

1. Mental Health Coordinator – Contractor
2. Health Services Administrator - Contractor

Interviews with medical and mental health practitioners demonstrated ongoing treatment recommendations designated by hospital personnel are implemented immediately upon a victim's return from a forensic medical examination, as well as upon receipt of an allegation of sexual abuse. Both practitioners stated appropriate medical and mental health evaluations, along with individualized treatment plans, are developed to ensure a continuum of care for both the victim and the alleged perpetrator beginning on the day the incident occurs. Practitioners further demonstrated services are coordinated to address immediate medical and mental health needs while providing ongoing support, follow-up treatment, and additional interventions as clinically indicated.

(a-c) The Missoula County Juvenile Detention Facility PAQ states the facility offers medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 36, section 115.383- Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers; Victim Services, Policy, states, “To ensure that a youth who has experienced sexual abuse in any confinement setting is offered, and provided if accepted, medical and mental health evaluations and appropriate treatment at no cost to the youth. Appropriate treatment is determined by medical and mental health professionals according to their professional judgment and must be consistent with the level of care provided in the community.”

(d-e) The Missoula County Juvenile Detention Facility PAQ states female victims of sexual abusive vaginal penetration while incarcerated are offered pregnancy tests.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 36-37, section 115.383- Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers; Victim Services, Procedure, states, “MCDF will offer medical and mental health evaluation and, as appropriate, treatment to all youth

who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility. Treatment of sexual abuse victims will include, follow-up services, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from MCDF. The treatment services will be consistent with the community level of care. Youth victims of sexually abusive vaginal penetration while at MCDF will be offered pregnancy tests. If pregnancy is detected, victims will receive information about and timely access to all lawful pregnancy-related medical services. PREA Compliance Coordinator will notify parent/guardian of test results in accordance with state and local laws. Youth victims of sexual abuse while at MCDF will be offered tests for sexually transmitted infections as medically appropriate. Treatment services will be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. MCDF will attempt to conduct a mental health evaluation for all known youth-on-youth abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners. “

(f) The Missoula County Juvenile Detention Facility PAQ states resident victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. Policy compliance can be found in provision (d-e) of this standard.

(g) The Missoula County Juvenile Detention Facility PAQ states treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Policy compliance can be found in provision (d-e) of this standard.

(h) The Missoula County Juvenile Detention Facility PAQ states if the facility is a prison, it attempts to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners. Policy compliance can be found in provision (d-e) of this standard.

Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. Interviews with medical and mental health practitioners demonstrated a coordinated continuum of care begins immediately upon receipt of an allegation of sexual abuse and continues following a victim's return from a forensic medical examination. Practitioners demonstrated hospital treatment recommendations are implemented without delay, appropriate medical and mental health evaluations are completed, and individualized treatment plans are developed to address the ongoing needs of both victims and alleged perpetrators as clinically indicated. Documentation further demonstrated victims

	are offered follow-up medical and mental health services, referrals for continued care when transferred or released, pregnancy testing and pregnancy-related medical services when applicable, sexually transmitted infection testing as medically appropriate, and treatment consistent with the community standard of care. Services are provided without financial cost to the victim and regardless of whether the victim identifies the alleged abuser or participates in the investigation. Collectively, interviews, documentation, and observations demonstrated the facility has established a comprehensive, coordinated, and victim-centered system that emphasizes immediate intervention, continuity of care, and ongoing access to medical and mental health services beyond the minimum requirements of the standard.
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115.386	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 3. Missoula County Detention Facility PREA Administrative & Response Review Form, dated 4.1.2022 Interviews: 1. Jail Commander The interview with the Jail Commander demonstrated the Sexual Abuse Incident Review Team consists of the Jail Commander, Captain, Lieutenant, Chief, Mental Health, Unit Manager, Line Sergeant, PREA Coordinator, and one line staff member. She stated the team reviews the incident in its entirety, to include staff actions, supervisory oversight, video footage, compliance with policy and procedure, opportunities for improvement, potential corrective actions, the motivation for the incident, and the demographics of those involved. The Jail Commander further stated she and the Assistant Commander of Operations are responsible for overseeing the implementation and sustainment of the team's recommendations. Site Observations:

The facility did not have a sexual abuse investigation in the past 12 months.

(a) The Missoula County Juvenile Detention Facility PAQ states the facility ordinarily conducts a sexual abuse incident review within 30 days of the conclusion of the criminal or administrative sexual abuse investigation. In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents was zero.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 37, section 115.386- Sexual abuse incident reviews, Policy, states, “At the conclusion of every sexual abuse investigation, an incident review will be completed to evaluate whether any changes in policy or practice at the facility need to be made. The incident review process is intended to allow the facility to identify systemic problems in policies, practices, dynamics, physical barriers, staffing levels, and monitoring what may have contributed to an incident or allegation of sexual abuse, so that the facility can improve conditions to avoid future incidents of allegations.”

(b) The Missoula County Juvenile Detention Facility PAQ states sexual abuse incident reviews are ordinarily conducted within 30 days of concluding the criminal or administrative investigation. In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents was zero.

The facility provided a Missoula County Detention Facility PREA Administrative & Response Review Form. This form documents the following.

- Victims Name / Allegation Type / Date of Incident
- Incident # / Incident Type / Facility type
- At the time of the incident, did staffing levels meet required ratio?
 - o If yes, was staffing sufficient?
 - o Did incident involve new staff (within 120 days of hire)?
 - o If yes, had new staff received all training (including adequate on the job training/ shadowing?)

- o Was veteran staff current on training?
 - o At the time of the incident, was staff in their assigned area?
 - o Were inmates in assigned area?
 - o Were there any physical barriers to supervision (outside of line of sight, closed door, etc.)?
 - o Any other factors not addressed above?
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- Did Inmate Risk Assessments take place at intake (Including documentation in file)?
 - Were room assignments appropriate?
 - Has the alleged perpetrator previously been identified as a potential threat to others?
 - If yes, was any action taken (prior to the incident) to reduce potential threat?
 - Did the alleged incident take place in an area under video surveillance?
 - If yes, were cameras working?
 - Should monitoring technology be deployed or augmented to supplement supervision by staff?
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- Is there any indication the incident was motivated by race, ethnicity, gender identity, LGBTQI identification, status or perceived status or gang affiliation?
 - Is there any indication the incident was motivated by any other group dynamics at the facility?
 - Is there a need for a Recommendations & Implementation plan?
 - If yes, were they documented and attached to this form?
 - Are there indications in the allegation or investigation that signify a need to change policy or practice to better prevent, detect, or respond to sexual abuse?
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1. Final report and summary of findings with recommendations for improvement, for the questions mark with an *.
 2. If unable to implement the recommendations above, reason are documented below.

3. Date incident was reviewed at Missoula County Detention facility.

4. Administrative Team Members Present

Jail Administrator Signature / Date

PREA Compliance Coordinator Signature / Date

Classification Officer / Unit Manager Signature / Date

Medical / Mental Health Signature / Date

(c) The Missoula County Juvenile Detention Facility PAQ states the sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners.

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 37, section 115.386- Sexual abuse incident reviews, Procedure states, “Within 30 days of the conclusion of the sexual assault investigation, the PREA Compliance Coordinator will conduct a sexual abuse incident review utilizing the MCDF Administrative & Response Review Form. The review team will include upper-level management officials with input from Unit Managers, investigators, and medical or mental health practitioners. The PREA Compliance Coordinator and the review team will consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or, gang affiliation; or was motivated or otherwise caused by other group dynamics at the program; Examine the area facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; Assess the adequacy of staffing levels in that area during different shifts; Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and Prepare a report of its findings. MCDF will implement the recommendations for improvement or document the reasons for not making changes.”

(d) The Missoula County Juvenile Detention Facility PAQ states the facility prepares a report of its findings from sexual abuse incident reviews, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1) -(d)(5) of this section, and any recommendations for improvement and submits such report to the facility head and PREA Compliance Manager. Policy compliance can be found in provision (c) of this standard.

	(e) The Missoula County Juvenile Detention Facility PAQ states, the facility implements the recommendations for improvement or documents its reasons for not doing so. Policy compliance can be found in provision (c) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.387	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 3. 2025 PREA Annual Report, Missoula County Juvenile Detention Facility 4. Incident Listing Summary (a)/(c)-1,2 The Missoula County Juvenile Detention Facility PAQ states the agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 38, section 115.387- Data collection, Policy, states, “To ensure that facilities collect uniform data on how many allegations of sexual abuse are made at its facilities, the type of sexual abuse alleged, and how the allegations were resolved. Collecting this data and comparing the data annually can reveal trends or changes in facility sexual safety. The standard envisions sharing of the data annually with the Department of Justice to increase the knowledge of the prevalence of sexual abuse in correctional facilities. Additionally, increasing the available data and information on the incidence of sexual abuse consequently improves the agency and facility management.”

Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 38, section 115.387- Data collection, Procedure, states, “MCDF will collect accurate, uniform data for every allegation of sexual abuse in the facility. The PREA Compliance Coordinator will maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. Data collected by site PREA Compliance Coordinator shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. The PREA Compliance Coordinator will aggregate the incident-based sexual abuse data at least annually. Upon request, MCDF will provide all such data from the previous calendar year to the Department of Justice no later than June 30.”

(b) The Missoula County Juvenile Detention Facility PAQ states the annual report includes a comparison of the current year’s data and corrective action from prior years. Intent for policy compliance can be found in provision (a) of this standard.

The facility provided a 2025 PREA Annual Report, Missoula County Juvenile Detention Facility. The report documents the following information.

- Year in Review: Aggregated Data
 - o Allegations
 - o Investigations
 - o Breakdown
- Missoula County PREA Goals and Values
 - o Prevention
 - o Policies and Practices
 - o Investigations and Response
- Missoula County’s Commitment to Values
 - o Culture and Community
 - o Inmate Support
 - o Better Practices
- Analysis
 - o Comparisons

o Progress Made

o Analysis

· Resources

The report is signed by the Commander

(d) The Missoula County Juvenile Detention Facility PAQ states the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. Intent for policy compliance can be found in provision (a) of this standard.

The facility provided an Incident Tracking form. The form compiles the following information.

· Incident Number

· Incident Type

· Incident Category

· Incident Location

· Occurred Date / Time

· Reported Date / Time

· Reporting Officer

(e) The Missoula County Juvenile Detention Facility PAQ states N/A as the agency does not contract with private facilities. This provision is not applicable as the agency does not contract with private facilities.

(f) The Missoula County Juvenile Detention Facility PAQ states N/A as the Department of Justice has not requested agency data for the previous calendar year.

Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.388	Data review for corrective action
	Auditor Overall Determination: Meets Standard Auditor Discussion Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 Interviews: 1. Under Sheriff The interview with the Undersheriff demonstrated the PREA Coordinator is responsible for reviewing and aggregating PREA data to identify problem areas and patterns of concern. He stated corrective action is determined based on the issues identified, and the review process is ongoing to ensure continual improvement within the Sheriff's Office and, specifically, the Detention Facility. Once the annual data review is presented to and approved by the Jail Commander, it is made available to the public through the agency's website. (a) The Missoula County Juvenile Detention Facility PAQ states the agency reviews data collected and aggregated pursuant to §115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, and training, including: · Identifying problem areas; · Taking corrective action on an ongoing basis; and · Preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 38, section 115.388- Data review for corrective action, Policy, states, “To ensure that required sexual abuse data is used to identify problem areas, and to take ongoing corrective action to improve the prevention, detection and response policies and practices of MCDF. To require MCDF to prepare an annual report for their facility and for the agency as a whole on the prevalence of sexual abuse and to provide this report to the public through the MCDF website or other means thus ensuring transparency. Comparing the current year’s data with data from prior years

and providing an assessment of the agency's progress promotes agency accountability.

(b) The Missoula County Juvenile Detention Facility PAQ states the annual report includes a comparison of the current year's data and corrective actions to those from prior years. The annual report provides an assessment of the agency's progress in addressing sexual abuse.

Missoula County Detention Facility PREA Policy and Procedure - Juvenile Facility, page 38, section 115.388- Data review for corrective action, Procedure, states "MCDF will review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training. Data reviewed will include the following: Identifying problem areas; Taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective actions for each program, as well as the organization as a whole. The report will include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the organization's progress in addressing sexual abuse. MCDF's report shall be approved by the Commander and made readily available to the public through our website. MCDF may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a program but must indicate the nature of the material redacted."

(c) The Missoula County Juvenile Detention Facility PAQ states the agency makes its annual report readily available to the public, at least annually, through its website. Annual reports are approved by the agency head. The following is the agency website where the annual reports will be located is <https://www.missoula-county.us/government/public-safety/detention-facility>

(d) The Missoula County Juvenile Detention Facility PAQ states when the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility. Policy compliance can be found in provision (b) of this standard.

Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.389	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard Auditor Discussion Document Review: 1. Missoula County Juvenile Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, dated 5.2023 (a) The Missoula County Juvenile Detention Facility PAQ states the agency ensures that incident-based and aggregate data are securely retained. Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 39, section 115.389- Data storage, publication, and destruction, Policy, states, “To ensure that sexual abuse data is published appropriately for transparency while ensuring the safe storage of data to protect confidentiality, and to ensure that data is not destroyed prematurely. To inform the public about the levels of sexual abuse experienced by people in confinement and raise awareness of the issue, while also protecting the privacy of inmates who have been sexually abused.” Missoula County Detention Facility PREA Policy and Procedure – Juvenile Facility, page 39, section 115.389- Data storage, publication, and destruction, Procedure, states, “MCDF will ensure that data collected pursuant to § 115.387 is securely retained for at least 10 years after the date of its initial collection unless Federal, State, or local laws require otherwise. Hard copies of data are secured at the facility in either the Human Resources office or the PRRA Compliance Coordinator’s office. The electronic data is securely retained with access limited to the PREA Compliance Coordinator, and upper-level Administration. MCDF will make all aggregated sexual abuse data, from programs under its direct control readily available to the public at least annually through its website. Before making aggregated sexual abuse data publicly available, MCDF will remove all personal identifiers.” (b) The Missoula County Juvenile Detention Facility PAQ states agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website. Policy compliance can be found in provision (a) of this standard.

	(c) The Missoula County Juvenile Detention Facility PAQ states before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. Policy compliance can be found in provision (a) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
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115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	(a) During the prior three-year audit period, the agency ensured that each facility operated was audited, once. (b) This is the third audit cycle for Missoula County Youth Detention Center and the first year of the fifth audit cycle. (c) The Auditor was granted complete access to, and the ability to observe, all areas of the facility. (d) The Auditor was permitted to request and receive copies of any relevant documents (including electronically stored information). (e) The Auditor was permitted to conduct private interviews with residents. (f) Youth were permitted to send confidential information or correspondence to the Auditor in the same manner as if they were communicating with legal counsel. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.403	Audit contents and findings
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	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	(b) The agency has posted the current 2023 PREA audit report, on their website. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

Appendix: Provision Findings		
115.311 (a)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.311 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
115.311 (c)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	na
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	na
115.312 (a)	Contracting with other entities for the confinement of residents	
	If this agency is public and it contracts for the confinement of its residents with private agencies or other entities including other government agencies, has the agency included the entity's obligation to adopt and comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)	na
115.312 (b)	Contracting with other entities for the confinement of residents	

	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents OR the response to 115.312(a)-1 is "NO".)	na
115.313 (a)	Supervision and monitoring	
	Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility has implemented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility has documented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Generally accepted juvenile detention and correctional/secure residential practices?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any judicial findings of inadequacy?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any findings of inadequacy from Federal investigative agencies?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate	yes

	staffing levels and determining the need for video monitoring: Any findings of inadequacy from internal or external oversight bodies?	
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: All components of the facility's physical plant (including "blind-spots" or areas where staff or residents may be isolated)?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The composition of the resident population?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The number and placement of supervisory staff?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Institution programs occurring on a particular shift?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any applicable State or local laws, regulations, or standards?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any other relevant factors?	yes
115.313 (b)	Supervision and monitoring	
	Does the agency comply with the staffing plan except during limited and discrete exigent circumstances?	yes
	In circumstances where the staffing plan is not complied with, does the facility fully document all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
115.313 (c)	Supervision and monitoring	
	Does the facility maintain staff ratios of a minimum of 1:8 during resident waking hours, except during limited and discrete exigent circumstances? (N/A only until October 1, 2017.)	yes

	Does the facility maintain staff ratios of a minimum of 1:16 during resident sleeping hours, except during limited and discrete exigent circumstances? (N/A only until October 1, 2017.)	yes
	Does the facility fully document any limited and discrete exigent circumstances during which the facility did not maintain staff ratios? (N/A only until October 1, 2017.)	yes
	Does the facility ensure only security staff are included when calculating these ratios? (N/A only until October 1, 2017.)	yes
	Is the facility obligated by law, regulation, or judicial consent decree to maintain the staffing ratios set forth in this paragraph?	no
115.313 (d)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: Prevailing staffing patterns?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.313 (e)	Supervision and monitoring	
	Has the facility implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment? (N/A for non-secure facilities)	yes
	Is this policy and practice implemented for night shifts as well as day shifts? (N/A for non-secure facilities)	yes
	Does the facility have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational	yes

	functions of the facility? (N/A for non-secure facilities)	
115.315 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.315 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches in non-exigent circumstances?	yes
115.315 (c)	Limits to cross-gender viewing and searches	
	Does the facility document and justify all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches?	yes
115.315 (d)	Limits to cross-gender viewing and searches	
	Does the facility implement policies and procedures that enable residents to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering a resident housing unit?	yes
	In facilities (such as group homes) that do not contain discrete housing units, does the facility require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing? (N/A for facilities with discrete housing units)	yes
115.315 (e)	Limits to cross-gender viewing and searches	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.315 (f)	Limits to cross-gender viewing and searches	

	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.316 (a)	Residents with disabilities and residents who are limited English proficient	
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other? (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with residents who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes

	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Who are blind or have low vision?	yes
115.316 (b)	Residents with disabilities and residents who are limited English proficient	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to residents who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.316 (c)	Residents with disabilities and residents who are limited English proficient	
	Does the agency always refrain from relying on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.364, or the investigation of the resident's allegations?	yes
115.317 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or	yes

	coercion, or if the victim did not consent or was unable to consent or refuse?	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the bullet immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.317 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents?	yes
115.317 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with residents, does the agency: Perform a criminal background records check?	yes
	Before hiring new employees who may have contact with residents, does the agency: Consult any child abuse registry maintained by the State or locality in which the employee would work?	yes
	Before hiring new employees who may have contact with residents, does the agency: Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual	yes

	abuse or any resignation during a pending investigation of an allegation of sexual abuse?	
115.317 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?	yes
	Does the agency consult applicable child abuse registries before enlisting the services of any contractor who may have contact with residents?	yes
115.317 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have in place a system for otherwise capturing such information for current employees?	yes
115.317 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.317 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.317 (h)	Hiring and promotion decisions	

	Unless prohibited by law, does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.318 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.318 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.321 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.321 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based	yes

	on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	
115.321 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all residents who experience sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.321 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.321 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory	yes

	interviews?	
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.321 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency is responsible for investigating allegations of sexual abuse.)	na
115.321 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (Check N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.321(d) above.)	na
115.322 (a)	Policies to ensure referrals of allegations for investigations	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.322 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.322	Policies to ensure referrals of allegations for investigations	

(c)		
	If a separate entity is responsible for conducting criminal investigations, does such publication describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.321(a))	na
115.331 (a)	Employee training	
	Does the agency train all employees who may have contact with residents on: Its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with residents on: Residents' right to be free from sexual abuse and sexual harassment	yes
	Does the agency train all employees who may have contact with residents on: The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: The dynamics of sexual abuse and sexual harassment in juvenile facilities?	yes
	Does the agency train all employees who may have contact with residents on: The common reactions of juvenile victims of sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: How to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between residents?	yes
	Does the agency train all employees who may have contact with residents on: How to avoid inappropriate relationships with residents?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the agency train all employees who may have contact with residents on: How to comply with relevant laws related to	yes

	mandatory reporting of sexual abuse to outside authorities?	
	Does the agency train all employees who may have contact with residents on: Relevant laws regarding the applicable age of consent?	yes
115.331 (b)	Employee training	
	Is such training tailored to the unique needs and attributes of residents of juvenile facilities?	yes
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	yes
115.331 (c)	Employee training	
	Have all current employees who may have contact with residents received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.331 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.332 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes

115.332 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with residents been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with residents)?	yes
115.332 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.333 (a)	Resident education	
	During intake, do residents receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
	Is this information presented in an age-appropriate fashion?	yes
115.333 (b)	Resident education	
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.333 (c)	Resident education	

	Have all residents received such education?	yes
	Do residents receive education upon transfer to a different facility to the extent that the policies and procedures of the resident's new facility differ from those of the previous facility?	yes
115.333 (d)	Resident education	
	Does the agency provide resident education in formats accessible to all residents including those who: Are limited English proficient?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are deaf?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are visually impaired?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are otherwise disabled?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Have limited reading skills?	yes
115.333 (e)	Resident education	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
115.333 (f)	Resident education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats?	yes
115.334 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.331, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.334	Specialized training: Investigations	

(b)		
	Does this specialized training include: Techniques for interviewing juvenile sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: Proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: Sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.334 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.335 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes

	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.335 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.335 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.335 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.331? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.332? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.341	Obtaining information from residents	

(a)		
	Within 72 hours of the resident's arrival at the facility, does the agency obtain and use information about each resident's personal history and behavior to reduce risk of sexual abuse by or upon a resident?	yes
	Does the agency also obtain this information periodically throughout a resident's confinement?	yes
115.341 (b)	Obtaining information from residents	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
115.341 (c)	Obtaining information from residents	
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Prior sexual victimization or abusiveness?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Current charges and offense history?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Age?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Level of emotional and cognitive development?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Physical size and stature?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Mental illness or mental disabilities?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Intellectual or developmental disabilities?	yes
	During these PREA screening assessments, at a minimum, does	yes

	the agency attempt to ascertain information about: Physical disabilities?	
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: The resident's own perception of vulnerability?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Any other specific information about individual residents that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other residents?	yes
115.341 (d)	Obtaining information from residents	
	Is this information ascertained: Through conversations with the resident during the intake process and medical mental health screenings?	yes
	Is this information ascertained: During classification assessments?	yes
	Is this information ascertained: By reviewing court records, case files, facility behavioral records, and other relevant documentation from the resident's files?	yes
115.341 (e)	Obtaining information from residents	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents?	yes
115.342 (a)	Placement of residents	
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Housing Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Bed assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Work Assignments?	yes

	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Education Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Program Assignments?	yes
115.342 (b)	Placement of residents	
	Are residents isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other residents safe, and then only until an alternative means of keeping all residents safe can be arranged?	yes
	During any period of isolation, does the agency always refrain from denying residents daily large-muscle exercise?	yes
	During any period of isolation, does the agency always refrain from denying residents any legally required educational programming or special education services?	yes
	Do residents in isolation receive daily visits from a medical or mental health care clinician?	yes
	Do residents also have access to other programs and work opportunities to the extent possible?	yes
115.342 (c)	Placement of residents	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.342 (d)	Placement of residents	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.342 (e)	Placement of residents	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.342	Placement of residents	

(f)		
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.342 (g)	Placement of residents	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.342 (h)	Placement of residents	
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The basis for the facility's concern for the resident's safety? (N/A for h and i if facility doesn't use isolation?)	yes
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged? (N/A for h and i if facility doesn't use isolation?)	yes
115.342 (i)	Placement of residents	
	In the case of each resident who is isolated as a last resort when less restrictive measures are inadequate to keep them and other residents safe, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.351 (a)	Resident reporting	
	Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: 2. Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.351 (b)	Resident reporting	

	Does the agency also provide at least one way for residents to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
	Are residents detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security to report sexual abuse or harassment?	yes
115.351 (c)	Resident reporting	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.351 (d)	Resident reporting	
	Does the facility provide residents with access to tools necessary to make a written report?	yes
115.351 (e)	Resident reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes
115.352 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes

115.352 (b)	Exhaustion of administrative remedies	
	Does the agency permit residents to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.352 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.352 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by residents in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency determines that the 90 day timeframe is insufficient to make an appropriate decision and claims an extension of time (the maximum allowable extension of time to respond is 70 days per 115.352(d)(3)) , does the agency notify the resident in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the resident does not receive a response within the time allotted for reply, including any properly noticed extension, may a resident consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes

115.352 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of residents? (If a third party, other than a parent or legal guardian, files such a request on behalf of a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the resident declines to have the request processed on his or her behalf, does the agency document the resident's decision? (N/A if agency is exempt from this standard.)	yes
	Is a parent or legal guardian of a juvenile allowed to file a grievance regarding allegations of sexual abuse, including appeals, on behalf of such juvenile? (N/A if agency is exempt from this standard.)	yes
	If a parent or legal guardian of a juvenile files a grievance (or an appeal) on behalf of a juvenile regarding allegations of sexual abuse, is it the case that those grievances are not conditioned upon the juvenile agreeing to have the request filed on his or her behalf? (N/A if agency is exempt from this standard.)	yes
115.352 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does	yes

	the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the resident is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.352 (g)	Exhaustion of administrative remedies	
	If the agency disciplines a resident for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the resident filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.353 (a)	Resident access to outside confidential support services and legal representation	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by providing, posting, or otherwise making accessible mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies?	yes
	Does the facility enable reasonable communication between residents and these organizations and agencies, in as confidential a manner as possible?	yes
115.353 (b)	Resident access to outside confidential support services and legal representation	

	Does the facility inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.353 (c)	Resident access to outside confidential support services and legal representation	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.353 (d)	Resident access to outside confidential support services and legal representation	
	Does the facility provide residents with reasonable and confidential access to their attorneys or other legal representation?	yes
	Does the facility provide residents with reasonable access to parents or legal guardians?	yes
115.354 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of a resident?	yes
115.361 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment?	yes

	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.361 (b)	Staff and agency reporting duties	
	Does the agency require all staff to comply with any applicable mandatory child abuse reporting laws?	yes
115.361 (c)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials and designated State or local services agencies, are staff prohibited from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.361 (d)	Staff and agency reporting duties	
	Are medical and mental health practitioners required to report sexual abuse to designated supervisors and officials pursuant to paragraph (a) of this section as well as to the designated State or local services agency where required by mandatory reporting laws?	yes
	Are medical and mental health practitioners required to inform residents of their duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.361 (e)	Staff and agency reporting duties	
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the appropriate office?	yes
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the alleged victim's parents or legal guardians unless the facility has official documentation showing the parents or legal guardians should not be notified?	yes
	If the alleged victim is under the guardianship of the child welfare	na

	system, does the facility head or his or her designee promptly report the allegation to the alleged victim's caseworker instead of the parents or legal guardians? (N/A if the alleged victim is not under the guardianship of the child welfare system.)	
	If a juvenile court retains jurisdiction over the alleged victim, does the facility head or designee also report the allegation to the juvenile's attorney or other legal representative of record within 14 days of receiving the allegation?	yes
115.361 (f)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.362 (a)	Agency protection duties	
	When the agency learns that a resident is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the resident?	yes
115.363 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that a resident was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
	Does the head of the facility that received the allegation also notify the appropriate investigative agency?	yes
115.363 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.363 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.363 (d)	Reporting to other confinement facilities	

	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.364 (a)	Staff first responder duties	
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.364 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.365 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes

115.366 (a)	Preservation of ability to protect residents from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.367 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.367 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services?	yes
115.367 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes

	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Any resident disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Resident housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Resident program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.367 (d)	Agency protection against retaliation	
	In the case of residents, does such monitoring also include periodic status checks?	yes
115.367 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.368 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect a resident who	yes

	is alleged to have suffered sexual abuse subject to the requirements of § 115.342?	
115.371 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency does not conduct any form of administrative or criminal investigations of sexual abuse or harassment. See 115.321(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency does not conduct any form of administrative or criminal investigations of sexual abuse or harassment. See 115.321(a).)	yes
115.371 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations involving juvenile victims as required by 115.334?	yes
115.371 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.371 (d)	Criminal and administrative agency investigations	
	Does the agency always refrain from terminating an investigation solely because the source of the allegation recants the allegation?	yes
115.371 (e)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal	yes

	prosecution?	
115.371 (f)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as resident or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.371 (g)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.371 (h)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.371 (i)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.371 (j)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.371(g) and (h) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years unless the abuse was committed by a juvenile resident and applicable law requires a shorter period of retention?	yes
115.371 (k)	Criminal and administrative agency investigations	

	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation?	yes
115.371 (m)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.372 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.373 (a)	Reporting to residents	
	Following an investigation into a resident's allegation of sexual abuse suffered in the facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.373 (b)	Reporting to residents	
	If the agency did not conduct the investigation into a resident's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the resident? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
115.373 (c)	Reporting to residents	
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the resident's unit?	yes

	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.373 (d)	Reporting to residents	
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
115.373 (e)	Reporting to residents	
	Does the agency document all such notifications or attempted notifications?	yes
115.376 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual	yes

	harassment policies?	
115.376 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.376 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.376 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies, unless the activity was clearly not criminal?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.377 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with residents?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.377 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility	yes

	take appropriate remedial measures, and consider whether to prohibit further contact with residents?	
115.378 (a)	Interventions and disciplinary sanctions for residents	
	Following an administrative finding that a resident engaged in resident-on-resident sexual abuse, or following a criminal finding of guilt for resident-on-resident sexual abuse, may residents be subject to disciplinary sanctions only pursuant to a formal disciplinary process?	yes
115.378 (b)	Interventions and disciplinary sanctions for residents	
	Are disciplinary sanctions commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied daily large-muscle exercise?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied access to any legally required educational programming or special education services?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident receives daily visits from a medical or mental health care clinician?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the resident also have access to other programs and work opportunities to the extent possible?	yes
115.378 (c)	Interventions and disciplinary sanctions for residents	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether a resident's mental disabilities or mental illness contributed to his or her behavior?	yes
115.378 (d)	Interventions and disciplinary sanctions for residents	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations	yes

	for the abuse, does the facility consider whether to offer the offending resident participation in such interventions?	
	If the agency requires participation in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives, does it always refrain from requiring such participation as a condition to accessing general programming or education?	yes
115.378 (e)	Interventions and disciplinary sanctions for residents	
	Does the agency discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.378 (f)	Interventions and disciplinary sanctions for residents	
	For the purpose of disciplinary action, does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
115.378 (g)	Interventions and disciplinary sanctions for residents	
	Does the agency always refrain from considering non-coercive sexual activity between residents to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between residents.)	yes
115.381 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.341 indicates that a resident has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the resident is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?	yes
115.381 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.341 indicates that a resident has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the resident is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening?	yes

115.381 (c)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.381 (d)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18?	yes
115.382 (a)	Access to emergency medical and mental health services	
	Do resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.382 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do staff first responders take preliminary steps to protect the victim pursuant to § 115.362?	yes
	Do staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.382 (c)	Access to emergency medical and mental health services	
	Are resident victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.382	Access to emergency medical and mental health services	

(d)		
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.383 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.383 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.383 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.383 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are resident victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.)	yes
115.383 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.383(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if all-male facility.)	yes
115.383 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.383 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	

	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.383 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners?	yes
115.386 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.386 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.386 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.386 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes

	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.386(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.386 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.387 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.387 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.387 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.387 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.387 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for	na

	the confinement of its residents.)	
115.387 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na
115.388 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.388 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.388 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.388 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when	yes

	publication would present a clear and specific threat to the safety and security of a facility?	
115.389 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.387 are securely retained?	yes
115.389 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.389 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.389 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.387 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na

	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates, residents, and detainees permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403 (f)	Audit contents and findings	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes