

PREA AUDIT: Final Auditor's Summary Report

JUVENILE FACILITIES



Name of Facility: CENTRAL OHIO YOUTH CENTER	
Physical Address: 18100 STATE ROUTE 4, MARYSVILLE, OHIO 43040	
Date report submitted: November 5, 2014	
Auditor information: Tracy S. Maxwell	
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Telephone number: 904-349-0045	
Date of facility visit August July 28-29	
Facility Information	
Facility Mailing Address: (if different from above)	
Telephone Number: 740-634-3094	
The Facility is:	<input type="checkbox"/> Military <input type="checkbox"/> County <input type="checkbox"/> Federal <input checked="" type="checkbox"/> Private for profit <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> State <input type="checkbox"/> Private not for profit
Facility Type:	<input checked="" type="checkbox"/> Detention <input type="checkbox"/> Correction <input type="checkbox"/> Other:
Name of PREA Compliance Manager: KATHYHOUSE Title: EDUCATION COORDINATOR	
Email Address: khouse@coyc.org	Telephone Number: 937-642-1015
Agency Information	
Name of Agency: CENTRAL OHIO YOUTH CENTER	
Governing Authority or Parent Agency: (if applicable)	
Physical Address: 18100 STATE ROUTE 4, MARYSVILLE OHIO 43040	
Mailing Address: (if different from above)	
Telephone Number: 937-642-1015	
Agency Chief Executive Officer	
Name: VICTORIA JORDAN	Title: SUPERINTENDENT
Email Address: VMJORDAN@COYC.ORG	Telephone: 937-642-1015
Name: VICTORIA JORDAN	Title: PREA Coordinator
Email Address: VMJORDAN@COYC.ORG	Telephone Number:

AUDIT FINDINGS

NARRATIVE:

The Central Ohio Youth Center (COYC) is a 38-bed maximum security juvenile detention and treatment facility. The facility opened in October 1973 as an 18-bed district detention center serving five counties. The average length of stay for detention residents is 7-10 days and treatment residents typically spend 90 days in the program.

DESCRIPTION OF FACILITY CHARACTERISTICS:

In 1973, there were two housing units. The facility was renovated in 1995 and a third living unit and gymnasium were added. There are 9 cells located on the north wing, 13 cells on the south wing and 16 cells on the east wing. The north wing houses detention females, the south wing house detention males and the east wing houses treatment males.

In 2011, the facility was renovated adding administrative offices and additional programming areas.

SUMMARY OF AUDIT FINDINGS:

The notification of the on-site audit was posted on June 24, 2014, six weeks prior to the first date of the on-site audit. The posting of the notices was verified by photographs received electronically from the PREA Coordinator. The photographs indicated notices were posted in various locations throughout the facility including the housing unit and administrative areas. The Pre-Audit Questionnaire, policies and supporting documentation were received on June 7, 2014. The documents were uploaded to a UBS flash drive.

The on-site audit was conducted July 28-29, 2014. A brief meeting was conducted with the Superintendent, Assistant Superintendent and PREA Compliance Manager. At the conclusion of the meeting, a complete tour of the facility was conducted including the resident's sleeping, showering areas and all areas where residents primarily spend their time.

The youth remain under direct supervision of the staff at all times and were engaged in various activities and programming in my observation during the tour. The Assistant Superintendent acknowledged where the blind spots were located in the facility.

During the two-day on-site visit, twelve staff including those from all three shifts were randomly selected and interviewed. All interviews validated staff knowledge of PREA standards and their responsibilities as first responders. Twelve residents were also randomly selected and interviewed. Residents were well informed of their right to be free from sexual abuse and harassment, how to report sexual abuse and harassment, and the community based victim advocate service providers.

There were no reported allegations of sexual abuse and two sexual harassment allegations noted during the past 12 months.

Number of standards exceeded: 0

Number of standards met: 39

Number of standards not met: 0

Number of standards Not Applicable: 2

Standard 115.311- Zero Tolerance of Sexual Abuse and Sexual Harassment; PREA Coordinator

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

Auditor comments:

The agency has one dedicated PREA Compliance Manager. In my interview with the PREA Compliance Manager, he validated his responsibilities and confirmed sufficient time to oversee the facility's PREA compliance efforts of preventing, detecting and responding to sexual abuse and harassment in the facility. In addition to the facility PREA Compliance Manager, the agency has one dedicated upper-level, agency wide PREA Coordinator. The agency's PREA Coordinator who also serves as the facility Superintendent confirmed during interviews there was sufficient time and authority to develop, implement and oversee efforts for all facilities.

The Central Ohio Youth Center policy 2-18 included definitions of prohibited behaviors and sanctions for prohibited behaviors. The agency PREA Coordinator, the facility PREA Coordinator conveyed the agency's zero-tolerance environment towards all forms of sexual abuse and harassment with the facility.

Standard 115.312- Contracting with Other Entities for the Confinement of Residents

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

Auditor comments:

The Central Ohio Youth Center is a stand-alone facility contracted and governed by the Ohio Department of Youth Services and does not contract for confinement of its residents.

Standard 115.313- Supervision and Monitoring

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

Auditor comments:

An assessment was conducted on August 29, 2014. The assessment included physical plant layout and blind-spot areas. The facility does not have surveillance cameras throughout the facility which covers blind-spots. All unannounced upper-level supervisors' rounds were also included on the assessment. There were no documented occurrences of exigent needs for deviations from the facility staffing plan. The facility's policy and documentation submitted, the staffing plan assessment, considerations were documented and validated for staffing ratios of 1.8 during awake hours and 1.10 during non-wake hours.

The facility's policy 5-10 requires intermediate-level or higher-level staff unannounced rounds to monitor, deter sexual harassment and sexual abuse. Unannounced rounds by higher-level staff and immediate-level staff were compliant. Documentation submitted addresses the intent of the standard.

Standard 115.315- Limits to Cross-Gender Viewing and Searches

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

Auditor comments:

This standard was validated compliant during resident and staff interviews. The Central Ohio Youth Center policy 5-7 prohibits cross-gender searches except in exigent circumstances and must document reasoning for the opposite gender search.

The policy additionally prohibits staff from examining a transgender or intersex youth for the sole purpose of determining the resident's genital status. Body cavity searches require the Director's authorization and must be conducted by licensed medical personnel in a medical establishment. The Search Log indicated there were no cross-gender strip searches or body cavity searches of residents in the past 12 months.

The policy limits pat-down searches to male staff absent exigent circumstances. This was validated during interviews with both residents and staff.

Policy requires female staff, volunteers and contractors entering the housing unit to announce themselves upon entering the areas where the likelihood of residents performing bodily functions occur and shower except in exigent circumstances or when viewing is incidental to routine room checks. There was no documented deviation from this policy.

Staff and Contractor training records along with staff interviews validated 100% compliance training on cross-gender pat searches, searches of transgender and intersex residents and Zero tolerance policy concerning sexual harassment and sexual abuse of Residents and Staff.

Standard 115.316- Residents with Disabilities and Residents Who are Limited English Proficient

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

- Does Not Meet Standard (requires corrective action)

Auditor comments:

Central Ohio Youth Center uses certified teachers to provide PREA related instructions to hearing impaired, vision impaired, limited English proficiency for residents, as needed. The Facility Superintendent acknowledged the commitment to take steps to ensure residents with disabilities or who are limited English proficient are provided meaningful access to all aspects of the facility's efforts to prevent, protect and respond to sexual abuse and harassment. PREA posters in various languages were posted throughout the facility for residents.

Facility policy 8-6 also stated the facility will not rely on resident interpreters, resident readers or any kind of resident assistants except when a delay in obtaining interpreter services could jeopardize resident's safety. Staff interviews validates compliance the facility does not use resident assistants and there were no instances of resident interpreter or readers being used in the past 12 months.

Standard 115.317- Hiring and Promotion Decisions

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

Auditor comments:

The facility policy 2-3 specifically addresses all elements as required by this standard. A review of 12 full-time employees and 4 volunteers/ contractors files and interviews revealed that all hired during the past 12 months had documented criminal background checks in their employee files. Questions regarding past conduct were asked during the interview process and posted in the employee's file. Additionally, signed acknowledgement forms concerning zero-tolerance of sexual harassment and sexual abuse were present in the files. The facility did validate compliance with the requirement to conduct background checks every five years.

Standard 115.318- Upgrades to Facilities and Technology

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

Auditor comments:

Central Ohio Youth Center has not acquired any new facilities since August 20, 2012. Additionally, the facility upgraded its facility in March 2011. The surveillance system with additional cameras and video monitoring systems were upgraded to enhance the facility's ability to protect residents from sexual abuse.

Standard 115.321- Evidence Protocol and Forensic Medical Examinations

- Exceeds Standard (substantially exceeds requirement of standard)

Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Auditor comments:

Central Ohio Youth Center policy requires the Facility Superintendent contact local law enforcement of Union County and Ohio Department of Youth Services who will conduct administrative investigations of abuse allegations; however, criminal investigations are conducted by the Union County Sheriff's Office.

Central Ohio Youth Center has a Memorandum of Understanding with Memorial Hospital of Union County who will provide SAFE services and victim advocate services. Union County Sheriff's Office acknowledged in writing that a uniform evidence protocol would be followed to maximize the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.

Standard 115.322- Policies to Ensure Referrals of Allegations for Investigations

Exceeds Standard (substantially exceeds requirement of standard)

Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Auditor comments:

Central Ohio Youth Center policy requires referrals of sexual abuse allegations to be submitted to the Union County Sheriff's Office and Ohio Department of Youth Services. In the past 12 months, Central Ohio Youth Center has had no allegations of sexual abuse. Two allegations of sexual harassment were noted during a 12 month period. The Central Ohio's website describes the investigative responsibilities for conducting investigations.

Standard 115.331- Employees Training

Exceeds Standard (substantially exceeds requirement of standard)

Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Auditor comments:

Central Ohio Youth Center and Ohio Department of Youth Services document training requirements for PREA. The training curriculums, documented staff training records and staff interviews validates compliance. The PREA training covered requirements for direct care workers,

medical personnel and contractors during initial training and annual refresher training. Specific topics covered during PREA training are consistent with this standard's requirements and is tailored to the facility's male resident population. All employees are trained as new hires regardless of their previous experience.

Standard 115.332- Volunteer and Contractor Training

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

Auditor comments:

Central Ohio Youth Center requires volunteers and contractors who have contact with residents to receive PREA training. Employees sign training rosters and are required to sign acknowledgement forms at the completion of training. Interviews with volunteers and contractors revealed they are knowledgeable concerning their responsibilities relative to PREA and the agency's zero tolerance policy regarding sexual abuse and harassment.

Standard 115.333- Resident Education

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

Auditor comments:

Central Ohio Youth Center requires residents to receive information during intake within 24-hours regarding the facility's zero tolerance policy and how to report sexual abuse and harassment. Additionally, Ohio Department of Youth Service provided a PREA orientation video for residents to review during intake. Residents are provided a safety guide handout which includes information on prevention/intervention, self-protection, reporting and treatment/counseling. Intake staff or case management staff reviews the handout with the residents and residents sign verifying receipt of the information. Documentation of residents' signatures were reviewed and confirmed during resident interviews. All residents interviewed stated they received this information the same day they arrived at the facility and periodically thereafter. Case management staff presents the PREA information in a manner that is accessible to all residents. During the facility tour PREA posters and reporting instructions were posted throughout the facility. If needed, the facility has facility staff and an agreement to provide translation services, hearing and visual impairment services for residents with disabilities or who may be limited English deficient. A review of residents' files rendered compliance for comprehensive training within 10-days of arrival.

Standard 115.334- Specialized Training: Investigation

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard)

for the relevant review period)

- Does Not Meet Standard (requires corrective action)
- ☒ Non-Applicable Standard

Auditor comments:

Central Ohio Youth Center refers all criminal and administrative investigations to the Union County Sheriff's Office and Ohio Department of Youth Services.

Standard 115.335- Specialized Training: Medical and Mental Health Care

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

Auditor comments:

Central Ohio Youth Center full-time, part-time medical and mental health care practitioners receive specialized training. The training documentation reviewed validated that all staff received this training from the National Institute of Corrections. While conducting interviews with the Health Services Administrator, it was validated that medical staff do-not conduct forensic examinations. Central Ohio Youth Center has a signed memorandum with Memorial Hospital of Union County to conduct all forensic examinations.

Standard 115.341- Obtaining information from Residents

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

Auditor comments:

Central Ohio Youth Center policy 7-2 addresses the screening process for vulnerability to victimization and sexual aggressive behavior residents by utilizing the Central Ohio Youth Center victim vulnerability assessment tool during the intake process. Facility residents are screened within seventy-two hours upon arrival at the facility. Those residents who score vulnerable to victim or sexually aggressive are included into the alert system, as well as receiving further assessments, as identified. Residents who are identified or report as prior sexual victims are referred to the medical and mental health professionals within 14 days of arrival. The screening documentation instrument met the tenets of the standard.

Standard 115.342- Placement of Residents in housing, bed, program, education and work Assignments.

- Exceeds Standard (substantially exceeds requirement of standard)

☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

■ Does Not Meet Standard (requires corrective action)

Auditor comments:

Central Ohio Youth Center uses the victimization screening information to determine a resident's dorm assignment and its proximity to direct care staff in the housing unit to ensure resident's safety.

Central Ohio Youth Center policy 7-2 precludes gay, bi-sexual, transgender and intersex residents being placed in a particular housing unit. Central Ohio Youth Center does not have isolation rooms for the sole purpose of placing gay, bi-sexual, transgender or intersex residents in predetermine areas. Facility staff and residents interviews validated compliance.

Standard 115. 351- Resident Reporting

■ Exceeds Standard (substantially exceeds requirement of standard)

☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

■ Does Not Meet Standard (requires corrective action)

Auditor comments:

Central Ohio Youth Center provides residents direct pre-programmed telephones to report sexual abuse to an outside agency. Additionally, documentation validates residents and staff were trained on the new protocols for reporting using the pre-programmed phones. Current facility policy 8-5 reflects processes for resident reporting. PREA posters were placed throughout the facility giving instructions for reporting and are provided to all residents during the intake process. Instructions include the Victims Assistance Program so they or their family members can write to an outside agency; and they may report to any staff member or family member. The policy also references reporting mechanisms for staff to privately report. Resident and staff interviews validated compliance with this standard.

Standard 115. 352- Exhaustion of Administrative Remedies

■ Exceeds Standard (substantially exceeds requirement of standard)

☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

■ Does Not Meet Standard (requires corrective action)

■ Non- Applicable

Auditor comments:

Central Ohio Youth Center has dedicated grievance boxes in the facility. The Facility Superintendent checks these boxes two times per week according to facility policy 8-2. All resident grievances regarding sexual abuse is referred to the Union County Sheriff's Office. All sexual harassment grievances are investigated by the Facility Superintendent who also serves

as the facility PREA Coordinator. There have been no grievances relating to sexual abuse filed in the past 12 months and two sexual harassment grievances filed. Staff and resident interviews validate their knowledge of how the grievance process is used to report sexual abuse or harassment. Documentation submitted according to the corrective action plan validates compliance for this standard.

Standard 115. 353- Resident Access to Outside Support Services and Legal Representation

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

Auditor comments:

Central Ohio Youth Center staff are mandated reporters and are required to immediately report any knowledge, suspicion or information they receive regarding sexual abuse and harassment, retaliation against residents or staff who report any incidents or any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Random staff and resident interviews validated the facility's compliance with this standard.

Interviews with the case management staff and health service professional validated their responsibility to inform residents 18 years old of their duty to report and limitations of confidentiality. The facility has signed memorandums of understanding agreements with Memorial Hospital of Union County and the Union County Prosecutors who shall provide victim advocate services for sexual abused residents.

Standard 115. 354- Third Party Reporting

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

Auditor comments:

Central Ohio Youth Center website informs the public with information regarding third-party reporting of sexual abuse or sexual harassment on behalf of any facility resident. Also, parents receive information regarding third party reporting. Resident interviews revealed their awareness of reporting sexual abuse or harassment to others outside of the facility.

Standard 115. 361- Staff and Agency Reporting Duties

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

Auditor comments:

Central Ohio Youth Center are mandated reporters. Staff is required to immediately report any knowledge, suspicion or information they receive regarding sexual abuse and harassment, retaliation against residents or staff who report any incidents or any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Random staff and health professional interviews validated their technical knowledge and compliance with this standard.

Standard 115. 362- Agency Protection Duties

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

Auditor comments:

Central Ohio Youth Center policy 8-2 requires residents identified as being at risk for sexual victimization to be monitored and to receive ongoing counseling from mental health or other qualified staff. Residents are provided services consistent with the community of care. There were no residents identified as being at risk for sexual abuse in the past 12 months, as indicated on a log maintained by the facility and as revealed in interviews with the Facility Superintendent, PREA Compliance Manager and other random facility staff.

Standard 115. 363- Reporting to other Confinement Facilities

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

Auditor comments:

Central Ohio Youth Center received no allegations of sexual abuse from other facilities during the past 12 months. Upon receiving an allegation that a resident was sexually abused while confined at another facility, Central Ohio Youth Center policy 8-5 requires the Facility Administrator to notify facility management overseeing the facility where the alleged abuse occurred.

Standard 115. 364- Staff First Responder Duties

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

Auditor comments:

There were no allegations of sexual abuse and two allegations of sexual harassment during the

past 12 months. Central Ohio Youth Center and Ohio Department of Youth Services requires staff to take specific steps to respond to a report of sexual abuse including; separating the alleged victim from the abuser; preserving any crime scene within a period that still allows for the collection of physical evidence; request that the alleged victim not take any action that could destroy physical evidence; and ensure that the alleged abuser does not take any action to destroy physical evidence, if the abuse took place within a time period that still allows for the collection of physical evidence. Random staff and first responder interviews validated their technical knowledge of actions to be taken upon learning that a resident was sexually abused.

Standard 115. 365- Coordinated Response

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

Auditor comments:

Central Ohio Youth Center coordinated response policy 8-5 provides detail instructions for staff actions after a resident has reported sexual abuse. Interviews with the Facility Superintendent, PREA Compliance Manager and other professional staff validated their technical knowledgeable of their duties in response to a sexual assault. The Ohio Department of Youth Services provides technical directions concerning coordinated actions taken in response to an incident of sexual assault among staff first responders, medical, and facility leadership.

Standard 115. 366- Preservation of Ability to Protect Residents from Contact with Abusers

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

Auditor comments:

Central Ohio Youth Center has entered into a Collective bargaining Agreement with Ohio Patrolman's Benevolent Association. In reviewing the collective bargaining agreement, Central Ohio Youth Center retains all rights to discipline, suspend or demote staff who violate facility rules.

Standard 115. 367- Agency Protection against Retaliation

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

Auditor comments:

There were two sexual harassment cases which required retaliation monitoring and no sexual abuse cases in the past 12 months. Central Ohio Youth Center is charged with monitoring for possible retaliation. There were no incidents of retaliation in the past 12 months reported. This was validated during my interview with the PREA Compliance Manager and Facility Superintendent. Central Ohio Youth Center policy requires the monitoring of residents and staff who have reported sexual abuse or harassment or who have cooperated in a sexual abuse or harassment investigation. The monitoring will take place for a period of 90 days or longer, as needed.

Standard 115. 368- Post-Allegation Protective Custody

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

Auditor comments:

Central Ohio Youth Center policy 9-5 and the resident handbook provide technical guidance for utilizing protective custody to protect residents who alleged to have suffered sexual abuse. Random staff interviewed validated residents are monitored constantly by staff. There has been no report of protective custody in the past 12 months

Standard 115. 371- Criminal and Administrative Agency Investigations

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

Auditor comments:

There were no reported investigations of alleged resident sexual abuse at Central Ohio Youth Center in the past 12 months. Central Ohio Youth Center policy 8-5 gives guidelines for reporting allegations of sexual abuse to the Union County Sheriff's Office for criminal investigations.

Standard 115. 372- Evidentiary Standards for Administrative Investigations

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

Auditor comments:

Central Ohio Youth Center policy 8-5 states the outside investigative entities, the Union County Sheriff's office shall impose a standard of preponderance of evidence or lower standards of proof for determining if allegations are substantiated.

Standard 115. 373- Reporting to Residents

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

Auditor comments:

There was no criminal and administrative investigations during the past 12 months. Central Ohio Youth Center policy 8-5 establishes processes to notify residents should the need arise and an allegation proves substantiated, unsubstantiated or unfounded. The Facility Superintendent and facility PREA Compliance Manager validated their technical knowledge of the process during their interviews.

Standard 115. 376- Disciplinary sanctions for Staff

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

Auditor comments:

There were no employees terminated or disciplined in the past 12 months for violation of the facility's sexual abuse or harassment policies. Central Ohio Youth Center policy 2-18 requires staff disciplinary sanctions up to and including termination for violating facility's sexual abuse or harassment policies. The policy also mandates that the violation be reported to law enforcement.

Standard 115. 377- Corrective Action for Contractors and volunteers

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

Auditor comments:

Central Ohio Youth Center requires volunteers and contractors in violation of the facility's policies and procedures regarding sexual abuse and harassment of residents be reported to local law enforcement and relevant licensing bodies unless the activity was clearly not criminal. During the interview with the Facility Superintendent/PREA Coordinator, it was reported that their have been no volunteers or contractors reported in the past 12 months.

The policy also requires the facility staff to take remedial measures and prohibit future contact with residents in the case of any violation of the facility's sexual abuse and harassment policies by contractors or volunteers.

Standard 115. 378- Disciplinary sanctions for Residents

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

Auditor comments:

There have been no reported cases of resident-on-resident sexual abuse cases in the past 12 months. Central Ohio Youth Center policy 8-5 establishes disciplinary sanctions for residents engaged in resident-on-resident sexual abuse.

Standard 115. 381- Medical and Mental screening; History of Sexual Abuse

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

Auditor comments:

There were no residents who disclosed prior victimization during their initial screening process. During the interview with the Health Services Administrator, she validated that although there were no disclosures all residents were offered follow-up meetings with medical and mental health providers within 14 days. Central Ohio Youth Center policy 7-2 requires mental health and medical staff to monitor and provide counseling on an on-going basis for residents who disclose a history of sexual abuse or who disclose previously perpetrating sexual abuse.

Standard 115. 382- Access to Emergency Medical and Mental Health Services

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

Auditor comments:

There have been no reported cases of sexual abuse in the past 12 months. Central Ohio Youth Center policy 8-5 and health policy 2-4, 3-7 requires mental health and medical staff to monitor and provide counseling on an on-going basis for residents who disclose a history of sexual abuse or who disclose previously perpetrating sexual abuse. The policy mandates residents receive timely, unimpeded care on-site and off-site emergency care and crisis intervention services.

Standard 115. 383- Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers

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

Auditor comments:

There have been no allegations of sexual assault and two allegations of sexual harassment in the past 12 months. Central Ohio Youth Center health policies 3-4, 3-7 and the memorandum of understanding with Memorial Hospital references procedures for residents of sexual abuse and ongoing medical and mental care.

Standard 115. 386- Sexual Abuse Incident Reviews

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

Auditor comments:

Central Ohio Youth Center policy requires an incident review team of every sexual abuse allegation at the conclusion of the investigation within 30 days. The review team includes the PREA Manager/ Facility Superintendent, Department program staff mental and medical health providers with input from line supervisors. The facility has a specific review form to capture all aspects of the incident.

Standard 115. 387- Data Collection

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

Auditor comments:

Central Ohio Youth Center policy requires the collection of accurate, uniform data for every allegation of sexual assault. The data is recorded using the Central Ohio's sexual abuse data collection form. The agency's PREA Coordinator and PREA Manager collect all data relating to PREA and forwards to Ohio Department of Youth Services.

Standard 115. 388- Data Review for Corrective Action

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

Auditor comments:

There have been no allegations of sexual abuse during the past 12 months. Central Ohio Youth Center reviews data quarterly for corrective action to improve the effectiveness of its prevention, protection and response policies, practices and training.

Standard 115. 389- Data Storage, Publication, and Destruction

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

Auditor comments:

The Ohio Department of Youth Services directs that data from every allegation of sexual misconduct at its facilities shall be collected and forwarded. The PREA Coordinator will review data collected in order to assess and improve the effectiveness of the Department's sexual misconduct prevention, detection and response policies, practices and training. The policy establishes that aggregated sexual abuse data be reviewed quarterly, no less than annually and placed on the facility's website after all personal identifiers are removed. All data collected will be maintained for at least 10 years after the date of the initial collection.

AUDITOR CERTIFICATION:

The auditor certifies that the contents of the report are accurate to the best of his/her knowledge and no conflict of interest exists with respect to his or her ability to conduct an audit of the agency under review.



Auditor's Signature

Date: November 5, 2014