

# **RENEWAL, INC.**

## **PREA COMPLIANCE MANUAL**

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RENEWAL, INC.  
PREA COMPLIANCE MANUAL

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### Glossary of Terms

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**Agency** – a business that provides a particular service; or a government department that is responsible for a particular activity/area.

#### **Allegation(s) of Sexual Contact – Outcome of Investigation:**

1. Substantiated – an allegation that was investigated and determined to have occurred.
2. Unfounded – an allegation that was investigated and determined not to have occurred.
3. Unsubstantiated – an allegation that was investigated and the investigation produced insufficient evidence to make a final determination as to whether or not the event occurred.

**Asexual** – a person who is not romantically or sexually attracted to any gender.

**Bisexual** – a person who is romantically or sexually attracted to more than one gender or sexual category.

**Community Confinement Facility** – a community treatment center, halfway house, restitution center, mental health facility, alcohol or drug rehabilitation center, or other community correctional facility (including residential re-entry centers), other than a juvenile facility, in which individuals reside as part of a term of imprisonment or as a condition of pre-trial release or post-release supervision, while participating in gainful employment, employment search efforts, community service, vocational training, treatment, educational programs, or similar facility-approved programs during nonresidential hours (all CCCs and CCFs fall into this category).

**Community Corrections Center (CCC)** – a residential correctional facility operated by the PA Department of Corrections.

**Community Contract Facility (CCF)** – a privately owned and operated residential correctional facility contracted with the PA Department of Corrections. This term may be used interchangeably with “Contract Agency” throughout this policy.

**Contract County Jail (CCJ)** – a jail or prison that is contracted with the PA Department of Corrections.

**Contractor** – a person who provides supplies or services on a recurring basis pursuant to a contractual agreement with the Department.

**Department** – Department of Corrections.

**Direct Staff Supervision** – supervision that requires security staff to be in the same room with, and within reasonable hearing distance of the offenders.

**Exigent Circumstances** – any set of temporary and unforeseen circumstances that require immediate action in order to combat a threat to the security or institutional order of a facility.

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**Facility** – a place, institution, building (or part thereof), set of buildings, structure, or area that is used by an agency for the confinement of individuals. This term may be used interchangeably with “Center” throughout this policy and refers to a CCC or CCF.

**Facility Director/designee** – the Director of a CCC or CCF or their management designee. This term may be used interchangeably with “Center Director/designee” throughout this policy.

**Gays** – refers to men attracted to other men.

**Gender** – a socially constructed concept classifying behavior as either “masculine” or “feminine”, unrelated to one’s external genitalia.

**Gender Expression** – a person’s expression of their gender identity, including appearance, dress, mannerisms, speech, and social interactions.

**Gender Identity** – distinct from sexual orientation and refers to a person’s internal, deeply felt sense of being male or female.

**Gender Nonconforming** – a person’s gender characteristics, appearance, mannerisms, and/or behaviors that do not conform to those typically associated with the person’s biological sex.

**Gender “norms”** – the expectation associated with “masculine” or “feminine” conduct, based on how society commonly believes males and females should behave.

**Grooming for Sexual Activity** – process that involves offenders approaching other offenders with offers of help, and perhaps protection from real or imagined sexual threats from others, with the ultimate aim of creating an obligation for sexual activity. The grooming might also include offers of commissary and/or other benefits. This deliberate process unfolds over time, with little overt pressure and no violence.

**Heterosexual** – sexual, emotional, and/or romantic attraction to persons differing from one’s own sex.

**Homosexual** – sexual, emotional, and/or romantic attraction to persons of the same sex.

**Housing Unit** – a designated area within the facility which is primarily utilized for offenders to sleep, change clothing, and shower.

**Interference with Official Process** – any failure to report or to cover-up an incident of sexual harassment/sexual abuse, making an allegation or statement that the party or witness knew could not have been true, or any other form of failure to cooperate with an investigation or inquiry.

**Intern** – an individual approved by Renewal, Inc. to use experience with Renewal, Inc. to further his or her academic or education pursuits, programs or credentials. The term does not include employees or contractors.

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**Intersex** – a condition in which a person is born with external genitalia, internal reproductive organs, chromosome patterns, and/or an endocrine system that does not fit typical definitions of male or female. Intersex is a medical condition.

**LGBTBQI** – acronym for a group of sexual minorities including lesbians, gay, bisexual, transgender, questioning and intersex individuals.

**Lesbian** – refers to women attracted to other women.

**Medical Practitioner** – a health professional who, by virtue of education, credentials, and experience, is permitted by law to evaluate and care for patients within the scope of his/her professional practice. A “qualified medical professional” refers to such a professional who has also successfully completed specialized training for treating sexual abuse victims.

**Mental Health Practitioner** – a mental health professional who, by virtue of education, credentials, and experience, is permitted by law to evaluate and care for patients within the scope of his/her professional practice. A “qualified mental health practitioner” refers to such a professional who has also successfully completed specialized training for treating sexual abuse victims.

**Offender** – any person, under the jurisdiction of the PA Department of Corrections or PA Board of Probation and Parole, assigned, confined or detained in a community confinement facility.

**Other Assigned Resident (OAR)** – a non-DOC/PBPP offender or civilian assigned as a resident to the facility (county offender, federal offender, private citizen, etc.).

**Pat Search** – a running of the hands over the clothed body of an offender by an employee to determine whether the individual possesses contraband.

**PREA** – Prison Rape Elimination Act.

**Prison** – an institution under state jurisdiction whose primary use is for the confinement of individuals convicted of a serious crime, usually in excess of one year in length, or a felony.

**Questioning** – active process in which a person explores his or her own sexual orientation, gender identity, questions the cultural assumptions that they are heterosexual and or gender conforming.

**Retaliation** – an act of vengeance, covert or overt action, or threat of action, taken against an offender or employee in response to a complaint of offender sexual harassment/sexual abuse or for an offender’s or employee’s cooperation in the reporting or investigation of sexual misconduct, regardless of the merits or the disposition of the complaint. Examples of acts of retaliation include, but are not limited to, unnecessary discipline, intimidation, unnecessary changes in work or program assignments, unjustified transfers or placements, or unjustified denials of privileges or services.

**Sex** – one’s anatomical make-up, including external genitalia, chromosomes, and reproductive system.

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**Sexual Abuse** – as defined by the National Standards to Prevent, Detect, and Respond to Prison Rape.

a. Sexual Abuse Includes –

- 1) Sexual abuse of an offender by another offender; or
- 2) Sexual abuse of an offender by a staff member, contractor, volunteer, intern, or individual who has business with or uses the resources of Renewal, Inc.

b. Sexual abuse of an offender by another offender includes any of the following acts, if the victim does not consent, is coerced into such act by overt or implied threats of violence, or is unable to consent or refuse:

- 1) Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;
- 2) Contact between the mouth and the penis, vulva, or anus;
- 3) Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object or other instrument; and
- 4) Any other intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or the buttocks of another person, excluding contact incidental to a physical altercation.

c. Sexual abuse of an offender by a staff member, contractor, volunteer, intern, or individual who has business with or uses the resources of Renewal, Inc. includes any of the following acts, with or without the consent of the offender:

- 1) Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;
- 2) Contact between the mouth and the penis, vulva, or anus;
- 3) Contact between the mouth and any body part where the actor has the intent to abuse, arouse, or gratify sexual desire;
- 4) Penetration of the anal or genital opening, however slight, by a hand, finger, object, or other instrument, that is unrelated to official duties or where the actor has the intent to abuse, arouse, or gratify sexual desire;
- 5) Any other intentional contact, either directly or through the clothing, of or with the genitalia, anus, groin, breast, inner thigh, or the buttocks, that is unrelated to official duties or where the actor has the intent to abuse, arouse, or gratify sexual desire;

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- 6) Any attempt, threat, or request by an actor to engage in the activities described in paragraphs 1) – 5) of this section;
- 7) Any display by an actor of his or her uncovered genitalia, buttocks, or breast in the presence of an offender; or
- 8) Voyeurism by an actor.

**For purposes of this definition, the term “actor” refers to a staff member, contractor, volunteer, intern, or individual who has business with or uses the resources of Renewal, Inc.**

- d. A properly conducted pat search will not be considered sexual abuse.

**Sexual Coercion** – occurs when an offender is forced to submit to sexual activity by threat of violence, for protection or some other factor imposed by the perpetrator.

#### **Sexual Harassment –**

- a. Repeated and unwelcome sexual advances, requests for sexual favors or verbal comments, gestures, or actions of a derogatory or offensive sexual nature, by one offender directed toward another; and
- b. Repeated, verbal comments or gestures of a sexual nature to an offender by a staff member, contractor, volunteer, intern, or individual who has business with or uses the resources of Renewal, Inc. including demeaning references to gender, sexually suggestive or derogatory comments about body or clothing, or obscene language or gestures.

**Sexual Identity** – the sex that a person sees themselves as; this can include refusing to label oneself with a sex.

**Sexual Orientation** – romantic and/or physical attraction to members of the same, opposite, or both sexes.

**Staff** – an employee of Renewal, Inc. or an employee of a Community Contract Facility. The word staff and employee may be used interchangeably throughout this policy.

**Strip Search** – a search that requires a person to remove or arrange some or all clothing so as to permit a visual inspection of the person’s breasts, buttocks, or genitalia.

**Transgender** – a person whose gender is different from the person’s birth sex.

**Transsexual** – a person whose physical anatomy does not match their gender identity, and seeks sex reassignment surgery or hormone treatment.

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**Transvestite** – a person who engages in gender non-conforming behavior, such as adopting the gender expression of the opposite sex for the purposes of sexual or emotional gratification, but does not necessarily consider their gender identity to be different from their sex.

**Vendor** – any individual having business inside the facility who may be in a position to hear, see or otherwise observe an incident or allegation of sexual abuse or sexual harassment.

**Volunteer** – an individual who donates time and effort on a recurring basis to enhance the activities and programs of the agency.

**Voyeurism by a staff member, contractor, volunteer, intern, or individual who has business with or uses the resources of Renewal, Inc.** – an invasion of privacy of an offender for reasons unrelated to official duties, such as peering at an offender who is using a toilet in his/her cell to perform bodily functions; requiring an offender to expose his/her buttocks, genitals, or breasts; or taking images of all or part of an offender's naked body or of an offender performing bodily functions.

**Youthful Offender** – any person under the age of 18 who is under adult court supervision and a resident of a community confinement facility.

**A. Facts Related to an Offender on Offender Sexual Abuse**

1. Sexual abuse is a complicated issue that can include sexual contact, sexual harassment, protective pairing, and coercion.
2. Anyone, male or female, can be sexually abused.
3. Age is not a factor in sexual abuse
4. Sexual orientation is not a factor in sexual abuse. A person who has committed sexual abuse may be heterosexual, homosexual, or bisexual. The victims may be heterosexual, homosexual, or bisexual.
5. While females are reportedly victimized at a higher rate than males, there are some very specific issues that surround male sexual abuse. A male who has been a victim of sexual abuse may feel dirty, ashamed, and guilty or experience a “loss of manhood.” He may believe that because he became sexually aroused or ejaculated he was not raped or somehow was consenting. This is not true. There are normal, involuntary physiological reactions that have nothing to do with sexual orientation or consent.
6. Many people who have committed sexual abuse state that the gender of their victims was inconsequential to them.
7. In a correctional setting, an offender who commits sexual abuse is frequently doing so to assert his masculinity, strength, dominance, and control. He commits sexual abuse to degrade, humiliate, and punish. He does this at the expense of weaker members of the offender population.
8. During the intake process, new offenders are constantly watched by the more experienced offenders. More sophisticated offenders can identify the predatory offenders and avoid interacting with them. New offenders lack this knowledge and experience.
9. When an offender reports abuse, the physical signs may not always be visible to the staff member.
10. Some places in facilities may be more vulnerable locations for assaults and other forms of sexual abuse. Areas of concern include unmonitored sleeping quarters, unsupervised program/common areas, showers and bathrooms, or areas where the lighting is not optimal.

**B. Characteristics of a Sexually Aggressive Offender**

Characteristics of a sexually aggressive offender include, but are not limited to, the following:

1. Between the ages of 27 and 45

2. Medium to large build and possessing physical strength
3. Aggressive in nature
4. Having limited ties to outside family and friends and having no outside means of financial support
5. Incarcerated for sex offenses or other violent offenses
6. More streetwise and gang affiliated
7. More accustomed to prison life
8. May have difficulty controlling anger
9. May display poor coping skills/strategies
10. May exhibit voyeuristic/exhibitionistic behavior
11. Following or “staying close” to the potential victim; taking food and other items from the victim
12. Requesting to be housed with an offender who has some of the characteristics listed in **Subsection C**
13. Doing a substantial amount of time and/or
14. Established himself/herself by power and strength with the prison offender hierarchy
15. Overly friendly or “protective” of weaker offenders and inexperienced staff
16. Usually presents as higher level of intelligence and
17. May present as manipulative

**C. Characteristics of an Offender Who May be Targeted as Victim**

Characteristics of an offender who may be targeted as a victim include, but are not limited to, the following:

1. Generally between 16 to 26 years of age
2. Small build and not seen as strong in appearance
3. Seen as possessing “feminine” characteristics
4. First time offenders, or offenders with relatively short sentences
5. Well connected to outside family and friends who provide an outside means of financial support
6. Identified as a member of the LGBTQI community
7. Has been previously sexually abused
8. Convicted of sexual offenses against a minor and/or
9. Appear passive, timid or anxious

**D. Possible Reactions of a Potential Offender Victim**

Possible reactions of a potential offender victim, when there is a change from previous behavior, include, but are not limited to, the following:

1. Withdrawing or isolating himself/herself
2. Depression or hopelessness
3. Lashing out in anger or frustration
4. Anxiety, fear or paranoia
5. Nightmares

6. Suicidal thoughts or feelings
7. Self-abuse
8. Uncharacteristic acting out in an effort to stay in segregation or to facilitate a transfer
9. Refusal to shower, eat, or be in certain less supervised areas of the facility
10. Increased medical complaints and attention, particularly increased concerns regarding sexually transmitted diseases, asking to be checked for sexually transmitted diseases;
11. Behavior changes, both social and psychological, could be signs of sexual violence. Staying in a location where staff can easily observe the offender is one typical indicator that a person may have been the victim of sexual violence.

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### ***Section 2 – Sexual Abuse/Sexual Harassment Prevention and Training***

#### **A. Prevention**

Renewal, Inc. will take appropriate actions to promote the safety of offenders against sexual abuse in its facilities. Renewal, Inc. will implement federal PREA Standards to ensure that all aspects of operations promote a safe environment.

Renewal, Inc. shall ensure that employees enforce and comply with the outlined procedures, take corrective action regarding non-compliance and document appropriately.

#### **ZERO Tolerance**

Renewal, Inc. takes every report of sexual misconduct seriously and will thoroughly, promptly, and objectively investigate all allegations.

Renewal, Inc. is committed to providing a safe and healthy environment for staff and offenders. Renewal, Inc. has a zero tolerance for sexual misconduct of any kind and will impose discipline for such misconduct, up to and including dismissal for staff and serious infractions for offenders who victimize other offenders. Incidents of sexual misconduct will also be referred to law enforcement when applicable. These policies will apply to employees, contractors, and volunteers.

#### **B. PREA Coordinator – Renewal, Inc.**

The Renewal, Inc. PREA Coordinator is responsible for PREA Compliance within the organization. The PREA Coordinator's sole responsibility is to develop, implement and oversee the organization's efforts to comply with the federal PREA Standards and Department policy within their respective organization. The Coordinator must have the authority to make necessary decisions to ensure compliance and report directly to their organization's head. This manager may also serve as the PREA Compliance Manager for a respective facility, if stationed within that facility, as applicable. The PREA Coordinator shall:

1. Ensure all PREA related investigations are conducted and reviewed in accordance with Renewal, Inc. policy and PREA Standards.
2. Ensure all facilities and contracts comply with the PREA standards and Renewal, Inc. policy related to PREA.
3. Coordinate the required PREA audits in conjunction with respective staff and the Renewal, Inc. PREA Compliance Managers.
4. Ensure that all required responses to the PREA audit report are completed and submitted within applicable timeframes.
5. Develop and document a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect offenders against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring, taking into consideration:

- a. Physical layout of each (including blind spots or areas where staff or offenders may be isolated);
  - b. Prevalence of substantiated and unsubstantiated incidents of sexual abuse; and
  - c. Any other relevant factors
6. In circumstances where the staffing plan is not complied with, document and justify all deviations from the plan. This documentation will be forwarded to the Executive Management team.
7. Whenever necessary, but no less frequently than once per year, assess, determine and document whether adjustments are needed to each staffing plan.
8. Conduct the annual staffing review in consultation with Executive Management, with final approval from the Renewal, Inc. CEO.

**C. PREA Compliance Manager (PCM) Duties – Renewal, Inc.**

Renewal, Inc. shall appoint managerial staff to serve as the PREA Compliance Managers; one per community confinement facility that shall:

1. Ensure staff, volunteers, vendors and offenders are trained in compliance with the PREA standards and Renewal, Inc.'s policy related to PREA.
2. Ensure the facility complies with the PREA standards and Renewal, Inc.'s policy related to PREA.
3. Review the initial reported allegation and related investigative packets, medical assessment(s), psychological assessment and any other relevant factors.
4. Ensure offenders who reported sexual abuse allegations are monitored to protect them from retaliation for at least 90 days. Specifically, the PCM will ensure that such offenders are provided with the opportunity to meet bi-weekly with a MH Counselor/Therapist, who will then report to the PCM. If the PCM determines that the initial monitoring indicates a continuing need, the periodic status checks will be extended beyond 90 days.
5. Ensure staff who reported sexual abuse allegations are monitored to protect them from retaliation for at least 90 days. Specifically, the PCM will ensure that such staff is provided opportunity to meet bi-weekly with the PCM and/or designee.
6. Chair the PREA Sexual Abuse Incident Review Committee.
7. Ensure recommendations as the result of investigations and/or reviews are implemented in a timely manner.

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### ***Section 2 – Sexual Abuse/Sexual Harassment Prevention and Training***

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8. Keep an updated list of all multi-lingual staff at the facility that would be able to provide translation for any PREA related issues.
9. Make monthly reports to the Renewal, Inc. PREA Coordinator regarding incidents of sexual abuse and harassment or retaliation in the facility and identify what needs offenders, facility staff, volunteers, contracted service providers or interns may have related to sexual abuse and/or harassment.
10. Ensure PREA administrative tours are conducted monthly.
11. Ensure that when staff learns that an offender is subject to a substantial risk of imminent sexual abuse, appropriate, immediate action will be taken to protect that offender.
12. Coordinate services provided to alleged victims including medical, mental health and crisis counseling.
13. Serve as the facility's liaison to the BOP, DOC, ACJ, City of PGH Police investigators (as applicable), assigned to the case.
14. Ensure all information, evidence, reports, etc. are provided to the BOP, DOC, ACJ investigators (as applicable), immediately upon receipt and/or request.
15. Ensure that staff do not conduct interviews or collect statements from anyone unless directed by the BOP, DOC, ACJ investigators (as applicable).
16. Work with the Renewal, Inc. PREA Coordinator to schedule and conduct mock PREA audits, at least one time per year and more; if deemed necessary, to ensure ongoing PREA standards compliance.
17. Remain up-to-date with PREA information as it becomes available through the statewide PREA Coordinator, PREA Resource Center, Department of Justice or other credible sources relating to PREA.

#### **D. PREA Compliance Manager Duties – Renewal, Inc.**

Renewal, Inc. shall assign a management employee to serve as the PREA Compliance Manager and provide this information to the BOP, DOC and ACJ (as applicable).

#### **E. PREA Administrative Tour**

1. PREA administrative tours must be conducted by management level employees to identify and deter staff sexual abuse and sexual harassment.
2. These tours are unannounced and will be conducted once each shift at varied times every month. They may be conducted more often if there is an identified need:

- a. Shifts are defined as 0600 – 1400; 1400-2200; 2200-0600
  - b. The PCM must participate in at least one tour every month
  - c. There is no minimum or maximum number of participants that must conduct the tour.
3. Staff conducting the tours shall:
  - a. **not** inform anyone that these tours are occurring. Any staff member found to be alerting other staff to these unannounced rounds will be subject to disciplinary action.
  - b. pay particular attention to the staff and video monitoring of the facility to detect areas that may need enhancement to ensure the sexual safety of the facility;
  - c. talk with staff and inquire about any perceived areas of concern relating to PREA or relating to any problem inmates relating to PREA;
  - d. focus on any and all areas of the facility where there could be a potential for offenders to become a victim of sexual abuse.
4. The PCM shall ensure each tour is documented.

**F. Upgrades to Facilities and Technologies**

Renewal, Inc. will be responsible for:

1. When designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, Renewal, Inc. shall consider the effect of the design, acquisition, expansion or modification upon the Organization's ability to protect offenders from sexual abuse. The applicable PREA Coordinator shall have input into how such plans shall affect Renewal, Inc. and/or the facility's ability to protect offender from sexual abuse.
2. When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, Renewal, Inc. shall consider how such technology may enhance the facility's ability to protect offenders from sexual abuse.
3. The PCM will be present at the planning meetings and be afforded the opportunity to discuss any concerns or make suggestions in regard to PREA compliance. Meeting minutes shall be recorded for all meetings.
4. The PCM will receive a copy of the meeting minutes and maintain them for documentation purposes.

**G. Access to Information for Special Populations**

1. Pursuant to the *DC-ADM 006, "Reasonable Accommodations for Inmates with Disabilities"*, Renewal, Inc. shall ensure that offenders with disabilities have an equal opportunity to participate in or benefit from all aspects of Renewal, Inc.'s efforts to prevent, detect and respond to sexual abuse and sexual harassment.
2. Written materials will either be delivered in alternative formats that accommodate the offender's disability or the information will be delivered through alternative methods, such as reading it to the offender or communicating through an interpreter, which ensure the understanding of the PREA related material.
3. The PREA Compliance Manager will ensure that only staff members or qualified contractors provide translation for offenders. If a multi-lingual staff member is not available, then the "AT&T Language Line" or equivalent service must be utilized. To access the AT&T Language Line, please follow these instructions:
  1. All calls must be initiated by a staff member.
  2. The language line phone number is 1-888-804-2044.
  3. The staff member will be required to enter a facility code: Facility Code is 9224
  4. The staff member will be required to give their name and location code: Location code is 9003
  5. Provide the First and Last Name of the Limited English Speaking Reentrant.

**H. Cross-Gender Searches (115.215)**

1. Community Corrections staff shall not conduct cross-gender strip searches or cross-gender visual body cavity searches under any circumstances.
2. If a situation arises that leads staff to believe that there is an imminent risk to staff or the overall security of the facility, staff will contact the local police for assistance. Example of this would be reputable information about the purported presence of a weapon on an offender.

3. No facility shall permit cross-gender pat down searches of female offenders. Facilities shall not restrict female offenders' access to regularly available programming or other opportunities in order to comply with this provision.
4. A transgender or intersex offender shall not be searched or physically examined for the sole purpose of determining the offender's genital status. If the offender's genital status is unknown, it may be determined during conversations with the offender, 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.
5. Staff shall be trained to conduct cross-gender pat searches (female staff-male offender only), and searches of transgender and intersex offenders, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

**I. Cross-Gender Supervision (115.215)**

1. A reasonable attempt must be made to ensure that at least one staff person, trained in search procedures, of the same gender as the in-residence population is on duty at all times.
2. When the status quo of the gender-supervision on the housing unit changes from exclusively same gender to mixed-gender or cross-gender supervision, staff is required to verbally announce the presence of opposite gender person(s) on the unit. The announcement is required for staff (security and non-security), volunteers, visitors, vendors and interns (example: "Female on the unit").
3. Offenders shall be able 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 dorm room checks.
  - a. Locations shall be designated throughout the facility that allows offenders to shower, perform bodily functions and change clothing with basic privacy.
  - b. Staff of the opposite gender shall announce their presence prior to entering a bathroom area, shower area, or "authorized changing area" (Example: "Female entering area").

**J. Screening for Risk of Victimization and Abusiveness**

1. Every offender shall be assessed for risk of being sexually abused by other offenders or sexually abusive toward other offenders:
  - a. Within 72 hours of initial reception to the facility, including transfers;
  - b. Between 20-30 days after initial reception;
  - c. When an offender is involved (victim or abuser) in an incident/allegation of sexual harassment and/or sexual abuse;
  - d. When warranted due to referral, request or receipt of additional information that bears on the offender's risk of sexual victimization of abusiveness;
  - e. When admitted to a licensed Mental Health Unit (MHU) at a CCF; and
  - f. Annually

2. The PREA risk assessments shall be conducted utilizing the **PREA Risk Assessment Tool**, otherwise known as the **PRAT**. The tool will be an objective instrument that shall consider, at a minimum, the following criteria to assess offenders for risk of sexual victimization:
  - a. Whether the offender has a mental, physical, or developmental disability;
  - b. The age of the offender;
  - c. The physical build of the offender;
  - d. Whether the offender has previously been incarcerated;
  - e. Whether the offender's criminal history is exclusively nonviolent;
  - f. Whether the offender has prior convictions for sex offenses against a child or an adult;
  - g. Whether the offender is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
  - h. Whether the offender has previously experienced sexual victimization;
  - i. The offender's own perception of vulnerability; and
  - j. Whether the offender is detained solely for civil immigration purposes.
3. The initial assessment (within 72 hours of reception) shall be conducted by a trained counselor/intake staff and consider prior acts of abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to Renewal, Inc., in order to assess offenders for the risk of being sexually abusive.
4. Follow up assessments, including the 20 day assessment, shall be conducted by the trained counselor/case manager assigned to the offender.
5. Assessments occurring at a licensed MHU shall be conducted by PREA trained medical staff.
6. Offenders shall not be disciplined for refusing to answer, or for not disclosing, complete information in response to the questions regarding prior victimization, disabilities, their perception of vulnerability or their sexual orientation.
7. If an offender refuses to answer the **PRAT** questions, the staff member administering the tool will document that the offender refused to answer the questions. The staff member will also discuss with the offender about the importance of answering the questions on the risk assessment honestly.
8. The information received through the administration of the **PRAT** shall be used to inform housing, work, education, and program assignments with the goal of keeping separate those offenders at high risk for being sexually victimized from those at high risk of being sexually abusive.
9. In deciding whether to assign a transgender or intersex offender to a facility for male or female offenders, and in making other housing and programming assignments, Renewal, Inc. shall consider on a case-by-case basis whether a placement would ensure the offender's health and safety, and whether the placement would present management or security problems.

- a. Placement and programming assignments for each transgender or intersex offender shall be reassessed by the PCM in consultation with facility staff that regularly interacts with the offender, at least twice each year, to review any threats to safety experienced by the offender. This is to be documented in the Offender Record or for SIP cases an ICAR entry.
  - b. A transgender or intersex offender's own views with respect to his or her own safety shall be given serious consideration.
  - c. Transgender and intersex offenders shall be given the opportunity to shower separately from other offenders.
10. Renewal, Inc. shall not place lesbian, gay, bisexual, transgender, or intersex offenders in dedicated facilities, units or wings solely on the basis of such identification or status, unless placement is in a dedicated facility, unit or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such offenders.
11. The answers to the **PRAT** should be stored in a secure location with access restricted to administrative personnel only.
12. The **PRAT** scores will be made available to select staff to aid in housing, bed, and programming assignment with the goal to keep separate those offenders at high risk of being sexually victimized from those offenders at high risk of being sexually abusive.
13. Information and scores associated with the **PRAT** shall never be shared with other offenders.

## K. Training

1. Basic Staff Training
  - a. The **PCM** at each facility shall ensure that all staff members (full time/part time) are informed that sexual contact with an offender is prohibited and that an offender has a right to report if sexual contact occurs through the basic PREA training. This training will include, at a minimum, the following information:
    - 1) Its zero tolerance policy for sexual abuse and sexual harassment within the Department of Corrections;
    - 2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting and response policies and procedures;
    - 3) Offenders' right to be free from sexual abuse and sexual harassment;
    - 4) The right of offenders and employees to be free from retaliation for reporting sexual abuse and sexual harassment;

- 5) The dynamics of sexual abuse and sexual harassment in confinement;
- 6) The common reactions of sexual abuse and sexual harassment victims;
- 7) How to detect and respond to signs of threatened and actual sexual abuse;
- 8) How to avoid inappropriate relationships with offenders;
- 9) How to communicate effectively and professionally with offenders, including lesbian, gay, bisexual, transgender, intersex or gender nonconforming offenders, and;
- 10) How to comply with relevant laws of Pennsylvania related to mandatory reporting of sexual abuse to outside authorities.

## 2. Ongoing Training

- a. Beginning in 2015 and every odd numbered year thereafter, the annual PREA education will be provided in the form of an update on **BCC-ADM 008**, and all other requirements from all jurisdictions, for all staff members.
- b. Beginning in 2016 and every even numbered year thereafter, the annual PREA education will be provided in the form of a refresher of the initial basic staff training.

## 3. Specialized Staff Training

- a. PREA Investigators – Renewal, Inc. shall have an MOU with the City of Pittsburgh Police for the purpose of PREA investigations.
- b. Medical/Mental Health Practitioners – Renewal, Inc. will have an MOU with a SAFE/SANE Nurse provider. Additionally, Renewal, Inc. will have an MOU with an organization for the purpose of rape crisis counseling and advocacy.

## 4. Training Verification

- a. Each individual who receives any type of training (basic, ongoing or specialized) shall be required to verify that they have received the information and understand the included items by completing and signing the **PREA Training and Understanding Verification Form**.
- b. All training information will be maintained by the PCM and or compliance staff for non-employees and made part of Renewal, Inc.'s official personnel file for employees.

5. Volunteers, Vendors, and Interns

Volunteers, vendors, and interns will receive training regarding sexual abuse and sexual harassment of an offender reflective of the level of contact that they have with offenders.

- a. High level of contact (contact on a daily basis) with offenders, including but not limited to, contracted food services, contracted maintenance staff, etc., - the training shall be the same as directed for full-time staff.
- b. Moderate level of contact (at least once a week) or any non-daily one-to-one contact with offenders, including but not limited to, religious volunteers, mentors, contracted food services, etc. - the training shall be the same as directed for full-time staff.
- c. Sporadic level of contact (anything less than once per week) with offenders, including but not limited to, delivery persons, intermittent repairs/services personnel, etc. - the training shall be a brief orientation by the PCM and documented on the **PREA Orientation Form**.

**L. Offender Education**

1. Every offender will receive information regarding sexual abuse and sexual harassment, how to report an incident of sexual abuse or sexual harassment, and what to do if he/she is the victim of sexual abuse or sexual harassment. The offender will receive a copy of the **PREA Brochure** immediately upon arrival into the facility. Additional information will be offered during offender orientation. All offenders will be shown a video/presentation that describes sexual abuse, how to report, and intervention.
2. The offenders' training will be conducted using the **Sexual Abuse Education Program**. The curriculum may be provided to offenders individually or in groups, with the aid of a video (Speaking Up) and/or PowerPoint presentation, or with other teaching aids. A staff member must be present at all times to facilitate discussion on the presentation and to answer questions.
3. Documentation that sexual abuse and sexual harassment training has occurred, during orientation, shall be recorded on the **PREA Offender Training and Understanding Verification Form**. And maintained in the offender's file.

**A. General Information**

1. An allegation of sexual abuse, sexual harassment or retaliation by other offenders, other assigned residents (OAR) or staff for reporting sexual abuse and/or sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents can be reported by several means: verbal, written, anonymous, or by a third party.
2. Sexual abuse and sexual harassment are clearly defined in the **Glossary of Terms** in this procedures manual.
3. Anyone who reports sexual abuse or sexual harassment should provide as many of the following details as possible regarding the incident(s):
  - a. Complete description of incident(s)
  - b. Names of all parties involved
  - c. Date(s)
  - d. Time(s)
  - e. Place(s) of alleged incidents; and
  - f. Witness(es), if any
4. *Every report of sexual abuse or harassment will be held in strict confidence; additional questioning or interviewing of the alleged victim, witnesses, or abuser(s) shall not be conducted by facility staff. The information shall not be shared amongst multiple staff or supervisors prior to contacting the BCC Operations Center Shift Commander, BOP, ACJ, as applicable.*
5. Retaliatory action against any person for reporting sexual abuse or sexual harassment or for providing information during an investigation is prohibited. An individual, who seeks to deter an offender or any person from reporting sexual activity, or who, in any manner, harasses or intimidates any person who reports the alleged contact is subject to discipline.
6. When doubt exists regarding whether or not an incident/allegation is related to sexual abuse or sexual harassment, the DOC Operations Center Shift Commander, BOP, ACJ, as applicable, shall be contacted for direction.

**B. Methods of Reporting for Offenders and Other Assigned Residents (OAR)**

1. An offender or other assigned resident (OAR) who is the victim of sexual abuse or sexual harassment by another offender, OAR, employee, contract service provider, volunteer, intern or an individual who has business with or uses the resources of Renewal, Inc., should report the abuse to a staff member as soon as possible. A report may be made to any staff member in the facility including, but not limited to, medical staff, psychology staff, security staff and/or treatment staff.

2. Methods of reporting include the following:
  - a. Verbal report to a staff member
  - b. Submitting a written report to a staff member
  - c. Sexual Abuse Reporting Phone Line
3. The alleged victim shall not be required to “put the allegation in writing.”
4. If an offender files a grievance related to sexual abuse, the grievance officer shall immediately contact the BCC Operations Center Shift Commander, BOP, ACJ, as applicable, for direction. The offender will be notified of this action. This will be considered an exhaustion of administrative remedies.

**C. Methods of Reporting for Friends, Family and General Public**

1. A toll-free Sexual Abuse Reporting Line has been established for the General Public to anonymously report sexual abuse or sexual harassment to the PA Crime Stoppers Tip line. A caller may choose to leave their name, but it is not necessary in order to make the report. The number is **1-800-472-8477**. The caller will receive a tracking number to use for follow up questions. Another resource for reporting sexual abuse or sexual harassment is Pittsburgh Action Against Rape. Their number is **1-866-363-7273**.
2. Allegations may also be directly reported to the Pennsylvania Department of Corrections at the following address:

Attention: PREA Coordinator  
Office of State Inspector General  
555 Walnut Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101

**D. Methods of Reporting for Staff & Interns**

1. A staff member or intern shall verbally notify the Center Director/designee without delay if he/she has knowledge that there has been an incident/allegation of sexual abuse or sexual harassment of an offender or other assigned resident (OAR).  
  
***NOTE: If the report involves an incident/allegation of sexual abuse the employee shall also complete first responder duties as outlined in Section 5 of this procedures manual.***
2. For DOC residents, a **DC-121 Part 3-BCC** shall be completed by every staff member who has knowledge of or receives a report (verbal or written) of an incident/allegation of sexual harassment or sexual abuse. This report shall be provided to the PCM/PCC/designee without delay.

3. The PCM/designee shall, without delay:
  - a. **Verbally** notify the BCC Operations Center Shift Commander, BOC, ACJ, as applicable, regarding every incident/allegation of sexual harassment and/or sexual abuse; and
  - b. Ensure first responders duties are completed in accordance with **Section 5** of this procedures manual for every incident/allegation of sexual abuse.
4. A staff member or intern may also make a private report to the facility PREA Compliance Manager or Renewal, Inc. PREA Coordinator.
5. A staff member or intern may also report to a third-party as listed under Section C.

**E. Volunteers, Vendors and Other Individuals**

1. Volunteers, vendors or other individuals who have business with or use the resources of the facility shall report to the Center Director/designee without delay if he/she has knowledge that there has been an incident of sexual abuse or sexual harassment of an offender or OAR.
2. The PCM/designee shall, without delay:
  - a. Document the allegations via the **DC 121, Part 3-BCC**;
  - b. **Verbally** notify the BCC Operations Center Shift Commander, BOP, ACJ, as applicable, regarding every incident/ allegation of sexual harassment and/or sexual abuse; and
  - c. Ensure first responder duties are completed in accordance with **Section 5** of this procedures manual for every incident/allegation of sexual abuse.

**F. Sexual Abuse Reporting phone Line & Website**

1. A toll-free Sexual Abuse Reporting Phone Line has been established (1-800-472-8477) for **anyone to anonymously report** sexual abuse and/or sexual harassment to the PA Crime Stoppers Tip Line.
2. ***Every facility must provide 24/7 unrestricted offender access to this toll-free number that protects the anonymity and confidentiality of the caller.***
3. A caller may choose to leave their name, but it is not necessary in order to make the report. The caller will receive a tracking number to use for follow up questions.

**\*\* Another resource for reporting sexual abuse or sexual harassment is Pittsburgh Action Against Rape. Their number is 1-866-363-7273.**

A written report to a third-party reporting address has been established with the Office of Inspector General (OSIG) Their address is:

Attention: PREA Coordinator  
Office of State Inspector General  
555 Walnut Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101

**G. Reports Received about Other Confinement Facilities**

1. Upon receiving an allegation that an offender was sexually abused or sexually harassed while confined at another facility, the PCM shall document the receipt of the allegation via **DC-121 Part 3-BCC**.
2. The PCM/designee shall **verbally** notify the BCC Operations Center Shift Commander without delay. The PCM shall notify the BOP and ACJ for their populations.

**H. Reports Received from other Confinement Facilities**

1. Upon receiving an allegation from another facility that an offender was sexually abused or harassed while confined at his or her facility, the PCM/designee shall document the receipt of the allegation via **DC-121 Part 3-BCC**. The PCM shall follow directives from the BOP/ACJ for their populations.
2. The Center Director/designee shall **verbally** notify the BCC Operations Center Shift Commander without delay.

**I. Reports Received about Incident/Allegations in the Community**

1. Upon occasion an offender may report that they have been the victim of sexual abuse, sexual assault, rape, etc., in the community.
2. The PCM/designee shall ensure the offender's safety and notify the BCC Operations Center Shift Commander without delay. The PCM will notify the BOP/ACJ for their jurisdictions.

**Renewal, Inc. PREA Compliance Manual**  
***Section 4 – Responding to and Investigating Allegations of Sexual Harassment***

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If confidentiality concerns exist regarding an OAR, a report utilizing the OAR's first name will be accepted.

Provide a copy of the final investigative report to the Contract Facility Coordinator (CFC) within 30 days of initial notification.

**A. Conducting the Administrative Investigation**

1. An administrative investigation shall be conducted for every reported incident/allegation of sexual harassment to determine internal discipline and contract violations. This shall be conducted by the oversight jurisdiction.
2. *Renewal, Inc. staff shall not conduct administrative investigations that involve a DOC/PBPP offender. Renewal, Inc. will follow the directives of the BOP and ACJ for their populations.*
3. Renewal, Inc. will follow the oversight jurisdictions directives for administrative investigations. Renewal, Inc. shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual harassment are substantiated.
4. At the conclusion of the investigation, the oversight jurisdiction's investigator will prepare a *confidential* investigative summary, as applicable.
5. The investigative summary shall include whether the evidence supports a finding that the allegation of sexual harassment was:
  - a. Substantiated – an allegation that was investigated and determined to have occurred.
  - b. Unfounded – an allegation that was investigated and determined not to have occurred.
  - c. Unsubstantiated – an allegation that was investigated and the investigation produced insufficient evidence to make a final determination as to whether or not the event occurred.

### A. First Responder Duties

1. Upon learning of an allegation that an offender or other assigned resident (OAR) was sexually abused, the first staff member to respond shall, without delay:
  - a. Call “911” if a physical and/or sexual assault is currently in progress;
  - b. As soon as safely possible, separate the alleged victim and alleged abuser. Escort the victim to a safe location away from others;
  - c. Notify the PCM/designee;
  - d. Contact the BCC Operations Center Shift Commander, BOP, ACJ, as applicable, and follow all direction provided to include preserving and protecting any possible crime scene until appropriate steps can be taken to collect evidence; and
  - e. For DOC residents, complete the **BCC First Responder Checklist** and **DC-121 Part 3-BCC**. Follow BOP and ACJ directives for documentations requirements for their jurisdictions.
2. The PCM shall ensure:
  - a. Staff and victim are in a safe location;
  - b. “911” is contacted for any victim that requires emergency medical treatment;
  - c. The **PREA Report** is completed as directed in **Section 3** of this procedures manual;
  - d. PSP or Pittsburgh Police, as applicable, is notified to conduct the criminal investigation;
  - e. The victim is provided access to a forensic medical examination as outlined;
  - f. The victim is provided access to a victim advocate as outlined;
  - g. The crime scene is preserved and protected until appropriate steps can be taken to collect evidence;
  - h. Staff on duty follows the required protocol;
  - i. No further questioning of the victim occurs by center staff;
  - j. The PCC/designee is notified; and
  - k. All actions are documented.

### B. Medical

1. If sexual contact is suspected and the victim reports an allegation of vaginal, oral, and/or anal penetration **by a body part or inanimate object**, and the most recent act occurred within the past **96 hours**, then he/she will be immediately transported to an outside medical facility to be examined by a medical professional who is skilled and experienced in the use of a rape kit for the collection of forensic evidence.

*NOTE: A staff member must accompany the victim to the hospital and stay with the victim until seen by medical professional. Wait for the victim and escort back to the center.*

2. All victims of sexual abuse shall be offered access to a forensic medical examination at an outside facility, without financial cost to the victim, using a Sexual Assault Forensic Examiner (SAFE), or Sexual Assault Nurse Examiner (SANE) where possible.
3. If a SAFE or SANE cannot be made available, the examination can be performed by other qualified medical practitioners; and documented appropriately.
4. The center PCM shall coordinate medical services related to sexual abuse at their facility.
5. The center will utilize the list of local hospitals that employ a SANE (Sexual Assault Nurse Examiner) and the medical facility that the center has entered into a **Medical Provider Letter of Agreement for CCF**.
6. Photographs of Injuries
  - a. Community Corrections staff shall **NOT** take any photographs when a sexual abuse allegation is made.
  - b. The collection of any photographic evidence must be conducted by the outside medical professional or PSP, or Pittsburgh Police.

### C. Offender Access to Outside Supportive Services

1. Renewal, Inc. works in collaboration with the Center for Victims (CFV) and its member centers. The center CFV, in conjunction with Renewal, Inc.'s PREA Coordinator, has worked to establish a **Rape Crisis Center Letter of Agreement for CCF** with the local rape crisis centers where all centers are located.
2. The center PCM shall ensure that offenders are provided with access to outside victim advocates for emotional supportive services related to sexual abuse which has occurred in a community confinement setting. Supportive services may be provided via a variety of methods including in person, over the phone and/or in writing. The preferred service delivery method is in person.
3. An offender will be offered the opportunity to talk with a victim advocate and receive continued care when they have been a victim of sexual abuse, no matter if they reported the abuse immediately or made a delayed disclosure.
  - a. If the offender is taken to a local hospital for forensic examination, the victim advocate will meet the victim at the hospital.

- b. If the offender does not receive medical attention at a hospital, the PCM shall make arrangements for the victim advocate to meet with the offender, if the victim wishes to speak with an advocate. This should occur off-site if possible.

**D. Continuity of Care**

Ongoing medical and mental health treatment shall be available for offenders who have been victimized by sexual abuse. This includes appropriate follow-up services and, when necessary, referrals for continued care following their transfer to other facilities and/or their release from Renewal, Inc.

**A. Responsibilities – Renewal, Inc.**

1. The administrative investigation involving any DOC/PBPP offender assigned to Renewal, Inc. will be conducted by the Bureau of Community Corrections (BCC) Security Division or the Department's Office of Special Investigations and Intelligence (OSII). In addition, Renewal, Inc. will follow the investigations requirements of the BOP and ACJ.
2. Renewal, Inc. staff who have received advanced training in PREA investigation are permitted to investigate any PREA related allegation/incident filed by an Allegheny County Jail reentrant.
3. In the event of an allegation/incident filed by a DOC/PBPP or BOP reentrant, the center shall take no investigative action unless directed by the Parent Jurisdiction.
4. When the allegation/incident involves a DOC other assigned resident (OAR) and staff member (no DOC/PBPP offender involvement) at a CCF, the DOC's Bureau Major/designee shall direct the CCF to:
  - a. Conduct the investigation, to include reporting to outside law enforcement, in accordance with their local policy and procedures; and  
  
**NOTE:** If confidentiality concerns exist regarding an OAR, a report utilizing the OAR's first name will be accepted.
  - b. Provide a copy of the final investigative report to the Contract Facility Coordinator (CFC) and Bureau Major/designee within 30 days of initial notification.
5. Staff members may **not** discuss any active investigation regardless of the level of information he/she is privy to.
6. An accused staff member, contract service provider, volunteer, intern or an individual who has business with or uses the resources of Renewal, Inc., may be suspended pending investigation of the allegation. This decision will be made by the DOC's Bureau Director/designee on a case-by-case basis (based on the evidence at hand). Renewal, Inc. will follow the directives of the BOP, DOC and ACJ when the allegation involves those jurisdictions.
  - a. The Bureau Director/designee shall consult with the Executive Deputy Secretary, the Bureau of Human Resources, and/or the Office of Chief Counsel regarding Renewal, Inc. employees.
  - b. The DOC's Bureau Director/designee shall consult with the Contract Agency head and/or Office of Chief Counsel regarding CCF employees. Renewal, Inc. shall follow the directives of the BOP and ACJ when incidents involve those jurisdictions.
  - c. The DOC's Bureau Director/designee will notify Renewal, Inc.'s PREA Coordinator of these decisions within three business days. Renewal, Inc. will follow the directives of the BOP and ACJ when incidents involve their jurisdictions.

**Renewal, Inc. PREA Compliance Manual**  
***Section 6 – Investigating Allegations of Sexual Abuse***

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7. All staff shall fully cooperate in any administrative or criminal investigation conducted by the BOP, ACJ, Pittsburgh Police, PA DOC, PBPP, PSP or other outside law enforcement agency. Failure to cooperate may result in disciplinary action and/or criminal prosecution.

**A. General**

1. A Sexual Abuse Incident Review shall be conducted at the conclusion of every sexual abuse investigation where the allegation was substantiated or unsubstantiated. No review will be conducted if the allegation has been determined to be unfounded. The review shall occur within 15 working days of notice of satisfactory completion of the investigation. These reviews must take place for **ALL** sexual abuse investigations, whether they are conducted by the bureau security division or OSII or other jurisdiction.
2. The purpose of the incident review is to look retrospectively at the incident to ensure that the incident was managed in compliance with this procedures manual; to gather data relevant to enhancing understanding of prison rape; and to sensitize staff members to possible “red flags” associated with such incidents so that they may become better at detecting preventable incidents.

**B. Sexual Abuse Incident Review**

1. The center PREA Compliance Manager/PCC will chair the Sexual Abuse Incident Review Committee. The PREA Compliance Manager, in collaboration with the PCC/designee, will determine the exact composition of the team based on the nature of the incident.
2. The Sexual Abuse Incident Review Committee shall:
  - a. Consider whether the incident or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;
  - b. 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 facility;
  - c. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;
  - d. Assess the adequacy of staffing levels in that area during different shifts;
  - e. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and
  - f. Prepare a confidential report, using the Sexual Abuse Incident Review Template.

**A. Notification to Offenders**

1. Following the investigation into an offender's allegation that he or she suffered sexual abuse or sexual harassment in a facility operated/contracted by Renewal, Inc., the PREA Compliance Manager at the facility where the offender is housed shall inform the offender, in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated or unfounded.
2. If another agency conducted the investigation, the PCC will request the relevant information from the investigative agency and forward it to the PREA Compliance Manager, who will inform the offender.
3. Following an offender's allegation that a staff member has committed sexual abuse or sexual harassment against the offender, the PREA Compliance Manager shall subsequently inform the offender when any of the following occur:
  - a. the staff member is no longer posted within the offender's unit
  - b. the staff member is no longer employed at the facility
  - c. the agency learns that the staff member has been criminally charged related to sexual abuse or sexual harassment within the facility; or
  - d. the agency learns that the staff member has been convicted on a charge related to sexual abuse or sexual harassment within the facility
4. Following an offender's allegation that he or she has been sexually abused or sexually harassed by another offender, the PREA Compliance Manager shall subsequently inform the alleged victim whenever:
  - a. Renewal, Inc. learns that the alleged abuser has been criminally charged related to sexual abuse or sexual harassment within the facility; or
  - b. Renewal, Inc. learns that the abuser has been convicted on a charge related to sexual abuse or sexual harassment within the facility.
5. These notifications apply to the victim only. Third party reporters will not be notified of outcomes and/or actions.

**B. Documentation/Reporting**

1. The PREA Compliance Manager shall document all notifications or attempted notifications via the **Offender Notification Form**.

2. All completed forms shall be placed in the offender's file and a copy forwarded to the DOC's PREA Captain/designee and CFC (as necessary). Renewal, Inc. will follow the directive of the BOP and ACJ for their populations.
3. Notifications must occur even in instances where an offender has been transferred to another facility, when possible.
4. Renewal, Inc.'s obligation to report the results of the investigation under this policy shall terminate if the offender is released from Renewal Inc.'s custody.

**C. Data Collection**

1. Renewal, Inc. shall prepare data collection reports at the direction/request of the contract oversight bodies i.e. BOP, PA DOC and Allegheny County Jail. The data collection reports shall be prepared in accordance with PREA standards. The PREA Coordinator shall oversee/review all PREA related data collection reports prior to submission. Renewal, Inc. shall post the PREA Annual Report and other PREA related public information on the front page of our website [www.renewalinc.com](http://www.renewalinc.com).