**PREA AUDIT: AUDITOR’S SUMMARY REPORT**

**JUVENILE FACILITIES**

****

|  |  |
| --- | --- |
| **FACILITY INFORMATION** | |
| **Name of Facility:** | **Old Colony YMCA (Girls Secure Detention Unit and Alternative Lock-Up Program)** |
| **Facility Type:** | **Private Non-Profit Residential Facility (Contract Vendor for MA DYS)** |
| **Date of On-Site Audit:** | **August 19, 2014** |
| **PARENT AGENCY OR GOVERNING AUTHORITY INFORMATION** | |
| **Governing Authority or Parent Agency:** | **Massachusetts Division of Youth Services is the Governing Authority** |
| **Address:** | **Boston, MA** |
| **Agency Chief Executive Officer:** | **Peter Forbes – Commissioner** |
| **Agency Wide PREA Coordinator:** | **Monica King – State Wide PREA Coordinator** |
| **Email:** | [**monica.l.king@state.ma.us**](mailto:monica.l.king@state.ma.us) |
| **AUDITOR INFORMATION** | |
| **Certified Auditor:** | **Kurt Pfisterer – Dual Certified Adult and Juvenile Facilities** |
| **Address:** | **8 Lakeshore Drive** |
|  | **Rensselaer, NY 12144** |
| **Email:** | [**kurtpfisterer@gmail.com**](mailto:kurtpfisterer@gmail.com) |
| **Telephone:** | **518 860 5764** |

**DESCRIPTION OF FACILITY CHARACTERISTICS:** The Old Colony YMCA consists of two distinct programs; the Girls Secure Detention Unit and the Alternative Lock-Up Program. There is a Facility Administrator that oversees both programs. Each individual program has a Program Director. The facility has a PREA Coordinator and each of the programs has a PREA Compliance Manager. For the purposes of the audit, each of the distinct programs was viewed as separate housing units within a single facility.

The facility consists of the second and third floors of The Old Colony YMCA Central Branch at 465 Main Street in Brockton, MA.

The Girls Secure Detention Unit (located on the third floor) is a 12-bed, hardware and staff secure program for adolescent females, ages 12-21 that have been committed to the custody of DYS or detained pending further court action. Length of stay varies depending on the youth’s case and circumstances. While at the Program the youth are positively engaged in a variety of educational, clinical and pro-social activities and groups. Youth are assigned a clinician and an advocate upon intake into the program.  Youth are able to meet with staff on a daily basis to assist them with any needs they may have while staying at the program.  Youth attend a full educational program throughout the week.  Clinical services are also offered to the youth.  Family engagement is important and is encouraged; family visits are offered on a weekly basis and scheduled to accommodate the family’s needs. Youth receive a full spectrum of medical services. There were eight youth present on the day of the audit and two at court.

The South East Regional Alternative Lock-Up Program (ALP),located on the second floor, allows youth 17 years of age and younger, who are in police custody to be held in a safe place, separate from adult offenders or police department holding cells, while they await arraignment or a court date. During an overnight or weekend stay, youth are kept safe, provided support and supervised to ensure their appearance in court. The program has a capacity of eight. There were no youth at the program during the audit.

Each of the programs maintains 24 hour supervisory coverage as well as an On-Call Administrator.

**SUMMARY OF AUDIT FINDINGS:** Auditor arrived at the facility the morning of August 19, 2014. An entrance meeting was held with the OCY Regional Vice President (who also serves as the PREA Coordinator for OCY), Facility Administrator, Program Directors, Clinical Director, the DYS Director of Residential Operations and the DYS PREA Coordinator.

A complete tour of the facility took a little over one hour. All areas were extremely well maintained. The facility has a video surveillance system. The system provides 85-90 % coverage of all program areas. Every door in the facility is covered by a camera view. There are no cameras in bathrooms or youth bedrooms. Robust staffing (4 : 1 waking and 7 : 1 sleeping), significantly above the standards, and excellent supervision practices fully mitigate any concerns regarding blind spots. There were four direct care staff on duty for the eight youth present. Sight lines were good in all housing areas. The designated posts for the overnight staff are located to facilitate sight and sound supervision.

Youth were observed during morning hygiene, during recreation activities, on the housing units, during movement, and at meals. Observations of staff supervision practices were consistent with the agencies policies. Interactions observed between staff and youth were very positive and appropriately professional.

The PREA education program for youth and screening for risk are conducted by clinical staff on the date of admission, and documented in a data base known as the DYS Juvenile Justice Enterprise Management System (JJEMS).

Youth are seen by a licensed medical professional within 12 hours of admission. The medical services available to youth are excellent. Youth receive a full range of dental, medical and ophthalmological services.

Administrative investigations regarding allegations of abuse are conducted by the Massachusetts Division of Youth Services (DYS). Criminal investigations of sexual abuse, assault and harassment are conducted by the Massachusetts State Police. Forensic examinations and evidence collection are performed at local healthcare facilities through a state-wide Memorandum of Understanding with the Massachusetts Department of Public Health.

There were no incidents of sexual abuse, assault or harassment during this audit period. This was verified by telephone interview with the DYS Director of Investigations, who confirmed that there have been no incidents of sexual abuse or assault at the facility during this audit period.

Cross-gender strip searches and pat searches are prohibited by policy. All staff and youth interviewed confirmed that cross-gender searches are not conducted. Strip searches are not conducted on youth less than 12 years of age.

Room confinement, segregation and isolation are not used at any of the programs. This was confirmed via interviews with youth and staff.

This auditor interviewed the following staff titles (number in parentheses indicates more than one staff in that title was interviewed):

* OCY Regional Vice President
* Program Directors (2)
* Clinical Director
* DYS PREA Coordinator
* Registered Nurse
* Youth Care Advocates (3)
* Shift Supervisor
* Shift Administrator
* Assistant Supervisor
* Facility PREA Compliance Manager (Detention)
* Facility PREA Compliance Manager (ALP)

Experience levels ranged from less than one year to over 15 years. All presented as very knowledgeable about their jobs and highly dedicated to keeping youth safe. The agency’s commitment to PREA was also very evident during interviews. Staff members were not only aware of their agency’s policies and procedures, but were able to discuss PREA and how it related to the overall mission of the program and the agency’s mission as a whole.

All staff members were well versed in their obligations as mandated reporters. All felt well supported by the agency, and DYS, and had no fear regarding retaliation for reporting abuse. All staff has received PREA specific training as first responders and all knew exactly what to do if they were a first responder. All felt empowered to proactively address issues related to sexual violence and were able to describe actions they would take to prevent and/or deter possible acts of sexual violence.

A total of eight youth at the program were interviewed. There were no youth currently at the facility that had made an allegation of abuse. There was one youth who made an allegation related to boundary issues (staff allegedly accessed her Facebook page). The facility provided all necessary documentation demonstrating that the incident was reported, a safety plan put in place to protect the youth and that an investigation was ongoing. There were no youth at the program who identified as LGBTI (all youth acknowledged being asked about sexual orientation upon admission). All youth interviewed had extensive knowledge of the right to be free from sexual abuse, assault or harassment. All youth acknowledged being screened upon admission (screening actually occurs on date of admission, which far exceeds the standard), receiving a comprehensive PREA education program upon admission and their right to be free from abuse in any form. All youth knew multiple ways to report abuse and felt very confident that any complaint they made would be properly addressed. None of the youth interviewed have ever reported abuse while committed to DYS. None of the youth reported ever having fear for their safety while at the facility (or any program in the DYS continuum of care). All said they felt very safe at the facility.

Interviews with youth and staff confirmed that the PREA education program and training has been fully integrated into the program.

The quality and organization of the documentation provided to this auditor was outstanding. The organized manner in which the interviews were facilitated by the agency made the process go very smoothly and allowed for lengthy interviews with no wasted time in between.

The Old Colony YMCA at 465 Main St. Brockton, MA is an outstanding provider of juvenile justice services. The scope of this audit (PREA compliance) does not afford the opportunity to go into all the positive aspects of the programs observed.

**STANDARDS DETERMINATION TOTALS:**

**Exceeds Standard – 3 Standards or approximately 7% of total standards.**

**Meets Standard - 38 Standards or approximately 93% of total standards.**

**Does Not Meet Standard – Zero Standards or 0% of total standards**

**CORRECTIVE ACTION PLANS**

|  |  |  |  |
| --- | --- | --- | --- |
| **Standard** | **Deficiency** | **Action(s) Needed** | **Documentation** |
| **N/A\*** | **N/A** | **N/A** | **N/A** |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

**\*Note-All standards were found to be in compliance. No corrective action is required.**

**AUDITOR CERTIFICATION:**

This auditor certifies that no conflict of interest exists with respect to his ability to conduct an audit of the Massachusetts Division of Youth Services or the Old Colony YMCA.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_ October 4, 2014

Kurt Pfisterer, Dual Certified PREA Auditor Date