

**PREA AUDIT REPORT**    Interim    Final  
**COMMUNITY CONFINEMENT FACILITIES**

**Date of report:** [Click here to enter text.](#)

<b>Auditor Information</b>			
<b>Auditor name:</b> Chris Sweney			
<b>Address:</b> P.O. Box 8840			
<b>Email:</b> csweney.prea@gmail.com			
<b>Telephone number:</b> (402) 658-0344			
<b>Date of facility visit:</b> August 15 <sup>th</sup> -16 <sup>th</sup> 2016			
<b>Facility Information</b>			
<b>Facility name:</b> Clinton House			
<b>Facility physical address:</b> 21 North Clinton Ave. Trenton, NJ 08609			
<b>Facility mailing address:</b> <i>(if different from above)</i> <a href="#">Click here to enter text.</a>			
<b>Facility telephone number:</b> (609) 503-4664			
<b>The facility is:</b>	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> Private for profit
	<input type="checkbox"/> Private not for profit		
<b>Facility type:</b>	<input type="checkbox"/> Community treatment center	<input checked="" type="checkbox"/> Community-based confinement facility	
	<input type="checkbox"/> Halfway house	<input type="checkbox"/> Mental health facility	
	<input type="checkbox"/> Alcohol or drug rehabilitation center	<input type="checkbox"/> Other	
<b>Name of facility's Chief Executive Officer:</b> Larry Glover			
<b>Number of staff assigned to the facility in the last 12 months:</b> 12			
<b>Designed facility capacity:</b> 49			
<b>Current population of facility:</b> 41			
<b>Facility security levels/inmate custody levels:</b> Minimum - Community Corrections			
<b>Age range of the population:</b> 23-62			
<b>Name of PREA Compliance Manager:</b> Larry Glover		<b>Title:</b> Program Supervisor	
<b>Email address:</b> Lglover@njaonline.org		<b>Telephone number:</b> (609) 503-4664	
<b>Agency Information</b>			
<b>Name of agency:</b> New Jersey Association on Correction			
<b>Governing authority or parent agency:</b> <i>(if applicable)</i> <a href="#">Click here to enter text.</a>			
<b>Physical address:</b> 986 South Broad Street Trenton, NJ 08611			
<b>Mailing address:</b> <i>(if different from above)</i>			
<b>Telephone number:</b> (609) 396-8900			
<b>Agency Chief Executive Officer</b>			
<b>Name:</b> Angel Perez		<b>Title:</b> Executive Director	
<b>Email address:</b> Aperez@njaonline.org		<b>Telephone number:</b> (609) 396-8900	
<b>Agency-Wide PREA Coordinator</b>			
<b>Name:</b> Helena Tome		<b>Title:</b> Director – ReEntry Services	
<b>Email address:</b> Htome@njaonline.org		<b>Telephone number:</b> (609) 396-8900	

## **AUDIT FINDINGS**

### **NARRATIVE**

On August 15<sup>th</sup> – 16<sup>th</sup> 2016 an audit of the NJAC Clinton House was conducted by Chris Sweney, DOJ Certified PREA Auditor. Six week prior to the onsite visit Clinton House was provide postings with the auditors contact information and dates the auditor would be visiting the facility. Additionally, the Clinton House provided their completed pre audit questionnaire and supporting documentation. Upon arrival at Clinton House, we checked in with the security monitor. I was provided with a PREA visitor notification form which I read and signed. After a short meeting with facility staff we did a complete tour. All areas of the facility was visited including the kitchen, dining area, administrative offices, laundry area and resident rooms. Auditor posting and PREA posters were seen in resident rooms and common areas throughout the facility. The Clinton House has a total of thirteen surveillance cameras monitored at the main desk. The facility has done its best to limit blind spots. Cameras are not located in areas that create cross-gender monitoring issues. Following the tour private space was provided to conduct interviews.

The auditor was provided a list of staff assigned to the facility. A total of five (5) random staff interviews from the day and evening shift were conducted. Interviews of the Program Supervisor/PREA Coordinator, NJAC Compliance Director, facility Case Manager, and NJDOC Contract Monitor were also completed. All specialized staff interviews were completed except SANE/SAFE and investigative staff. All SANE/SAFE exams are performed at St. Francis Hospital and investigations are conducted by the NJDOC. A total of nine staff interviews were completed.

Following staff interviews the auditor was provided with a list of all (41) residents at the facility. Residents were randomly selected and interviews where privately conducted. There were no limited English, or vision impaired inmates. Additionally, there were no transgender, gay, lesbian or intersex inmates in the facility. A total of 12 resident interviews were completed.

## **DESCRIPTION OF FACILITY CHARACTERISTICS**

The Clinton House is located in Trenton New Jersey and operated by the New Jersey Association on Corrections (NJAC) who contracts by with the New Jersey Department of Corrections to house residents recently released from NJDOC facilities. The Clinton House is a repurposed boarding house consisting of a three story main building and a two story “carriage” house. Residents and guests enter at the back of the main house and check in with the resident monitor. Guests are required to read and sign a PREA notification form as part of the check in process. The first floor of the main building has a common area for residents, a private telephone/and holding room and the case manager’s office. There are resident rooms on the first floor, room #1 has 6 residents, and room #2 has 11 residents. On the second floor, there is room #3 with 6 residents and room #4 with 14 residents. The third floor has room #5 with 10 residents. Rooms 1, 3 and 4 use the common, single use restrooms on the second floor. Room #2 has their own single use restroom in the room. Room #5 uses a common restroom on the third floor. There is a kitchen outside the back entrance of the main house used for heating pre-prepared meals and clean up. The carriage house first floor is for dining and common use. The second floor of the carriage house is administrative offices for the resident manager and other administrative staff. Clinton House residents are nearing the end of their state sentences and the primary focus for residents and staff is to find them permanent employment that carries over post release.

## **SUMMARY OF AUDIT FINDINGS**

Number of standards exceeded:

Number of standards met: 37

Number of standards not met: 0

Number of standards not applicable: 2

**Standard 115.211 Zero tolerance of sexual abuse and sexual harassment; PREA Coordinator**

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

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

The Clinton House has a zero tolerance policy towards all forms of sexual abuse and harassment. The policy outlines how the department prevents, detects, and responds to incidents of sexual abuse and sexual harassment. The policy also includes definitions of prohibited behaviors and sanctions for those who participated in those behaviors. The policy includes a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of inmates.

The Clinton House’s designated PREA Coordinator is indicated in the NJAC organizational chart. The PREA Coordinator indicated during his interview that he has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards.

**Policy, Materials, Interviews and Other Evidence Reviewed**

- NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment
- NJAC Organizational Chart
- NJAC Compliance Director Interview
- Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.212 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)

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This standard does not apply; the Clinton House does not contract with other entities to house their residents.

**Standard 115.213 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)

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The Clinton House and has a staffing plan which accounts for generally accepted practices; The Clinton House follows applicable regulations and standards to determine staffing levels. All components of the facility's physical plant, video monitoring system, composition of the resident population and placement of supervisory staff are also considered. Deviations from the staffing plan are documented and reported to the Program Supervisor. Staffing requirements are assessed annually and adjustments are made if necessary. Any changes to Clinton House staffing levels must be mutually agreed to by the NJDOC and NJAC. Vacancies at any position are reported to the contract monitor at the New Jersey Department of Corrections.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
Staffing Plan  
NJAC Compliance Director Interview  
Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.215 Limits to cross-gender viewing and searches**

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

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

Clinton House policy prohibits cross-gender pat searches, strip searches or cross-gender visual body cavity searches. Clinton House is a "hands free" facility. A WAND metal detector is used in lieu of hands on pat searches. The facility has implemented policies and procedures which enable inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their, buttocks, or genitalia, except when such viewing is incidental to routine checks. Facility staff is trained during initial orientation to conduct cross-gender pat searches, in case of an emergency. The Clinton House is an all-male facility. Female staff announces anytime they near one of the common use restrooms or enter one of the resident rooms. Resident interview indicated this is a common practice.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
Relias Learning - Cross Gender and Transgender Pat Search Video  
Random Staff Interviews  
Random Resident Interviews

**Corrective Action**

PREA Audit Report

No corrective action needed

**Standard 115.216 Residents with disabilities and residents who are limited English proficient**

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

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

The Clinton House takes steps and has a policy which ensures residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The Clinton House provides residents a handbook which is available in English and Spanish and they have a contract with Passaic County Women’s Center which provide other interpretive services. Additionally, the facility has bilingual staff and their PREA posters and pamphlets are available in English and Spanish.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
MOU-Clinton House and Passaic County Women’s Center  
NJAC PREA Poster  
NJAC PREA Pamphlet  
NJAC-Clinton House Resident Handbook  
Random Staff Interviews  
Random Resident Interviews

**Corrective Action**

No corrective action needed

**Standard 115.217 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)

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The NJAC Clinton House does not hire or promote anyone who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution. NJDOC completes criminal background checks on all new employees before they are allowed to have contact with residents. Clinton House does not utilize contract staff or volunteers. Criminal background checks are repeated every five years for current employees. All new applicants complete a "PREA Disclosure" consistent with the requirements listed in section A.1-3 of this standard. Nothing found in policy prohibits NJAC from provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee

if requested from an institutional employer for whom such employee has applied to work.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
NJDOC – Employee Application  
New Employee Criminal Records Check  
Current Employee Criminal Records Check  
NJAC Compliance Director Interview  
Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.218 Upgrades to facilities and technologies**

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

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The Clinton House considers the effect of any new design, acquisition, expansion, or modification on the agency's ability to protect residents from sexual abuse. Protection of residents from sexual abuse through the installation of electronic surveillance and other technology is also considered. In 2015 Clinton House had a significant fire. During the reconstruction, the protection of residents was considered when determining where to place cameras. A total of thirteen (13) cameras were installed during the reconstruction of the facility. The number of blind spots was greatly reduced through this process.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
Emails (Surveillance Camera discussion and purchase)  
NJAC Compliance Director Interview  
Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.221 Evidence protocol and forensic medical examinations**

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

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

**corrective actions taken by the facility.**

The Clinton House does not conduct administrative or criminal investigations. Policies are in place which requires employees to full cooperate with investigations conducted by the New Jersey Department of Corrections or local law enforcement. NJAC policy indicates that any victim of sexual abuse would be taken to St. Francis Hospital which is approved by the New Jersey Department of Corrections to assess, treat, provide prophylaxis, and gather forensic evidence without financial cost to residents. Examinations are performed by certified Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs).

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment

NJAC Compliance Director Interview

Program Supervisor/PREA Coordinator Interview

Random Staff Interviews

**Corrective Action**

No corrective action needed

**Standard 115.222 Policies to ensure referrals of allegations for investigations**

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

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

The Clinton House has a policy which ensures that all allegations of sexual abuse or harassment are turned over to the New Jersey Department of Corrections and administrative and/or criminal investigations are completed. Staff and resident interviews demonstrated a thorough understanding of this policy. Residents felt very confident that staff at the Clinton House would respond appropriately.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment

NJAC Compliance Director Interview

Program Supervisor/PREA Coordinator Interview

Random Staff Interviews

Random Resident Interviews

**Corrective Action**

No corrective action needed

**Standard 115.231 Employee training**

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

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

The Clinton House provides all staff with initial and ongoing training which includes their zero tolerance policy, how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies, residents right to be free from sexual abuse and sexual harassment, the right of residents and employees to be free from retaliation, abuse and all other components of this standard. Employee training is documented and maintained in the employee's personnel file. Staff interviews verified a comprehensive understanding of PREA related training.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment

NJAC Staff Training Curriculum:

- Relias - PREA What it means for you and your agency
- Relias - Cross gender and transgender pat search video
- Relias - Overview of law and your role
- Relias - Sexual abuse, dynamics, detection, and reporting
- Relias - Respectful communication with LGBTI residents
- Relias – Managing inmates at risk of sexual abuse
- Relias – Staff roles and responsibilities under the Prison Rape Elimination Act
- Webinar: PREA - Follow the yellow brick road

Staff Training Records

NJAC Compliance Director Interview

Program Supervisor/PREA Coordinator Interview

Random Staff Interviews

**Corrective Action**

No corrective action needed

**Standard 115.232 Volunteer and contractor training**

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

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

The Clinton House does not utilize volunteers or contract staff. However, all outside visitors to the facility are provided with and required to sign for information about PREA prior to having contact with residents. Information includes NJAC’s zero tolerance policy and the visitor’s duty to report instances of sexual abuse and harassment. Documentation of information provided to visitors is maintained at the facility.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment

Visitor PREA Acknowledgment Form

NJAC Compliance Director Interview

Program Supervisor/PREA Coordinator Interview

PREA Audit Report

Random Staff Interviews

**Corrective Action**

No corrective action needed

**Standard 115.233 Resident education**

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

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

All residents housed at the Clinton House are transferred from other NJDOC facilities. Resident interviews revealed that PREA related information is being provided several times before they are assigned to the Clinton House. During the intake process the Case Manager meets with residents and provides them with information explaining the zero tolerance policy regarding sexual abuse and sexual harassment, how to report incidents or suspicions of sexual abuse or sexual harassment, their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. Information is available in multiple formats and languages (English Resident Handbook, Spanish Resident Handbook, Resident PREA Poster English/Spanish) The Clinton House maintains documentation of formal education sessions in the resident’s file. Additionally, PREA related information is posted in all housing and common areas. Residents were very aware of the PREA standards.

**Policy, Materials, Interviews and Other Evidence Reviewed**

- NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment
- Resident File Review
- Resident PREA Acknowledgement Form
- Clinton House Resident Handbook (English/Spanish)
- Case Manager Interview (Intake and Screening Interview Questions)
- Random Resident Interviews

**Corrective Action**

No corrective action needed

**Standard 115.234 Specialized training: Investigations**

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

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The Clinton House does not conduct administrative or criminal investigations of sexual abuse or sexual harassment. All allegations are forwarded to the New Jersey Department of Corrections (NJDOC) for investigation. All NJDOC investigators receive specialized PREA training which includes techniques for interviewing sexual abuse victims, Miranda and Garrity warnings, sexual abuse evidence collection and criteria and evidence required to substantiate a case for administrative action or prosecution.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment

NJDOC PREA Investigator Training Curriculum

NJAC Compliance Director Interview

Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.235 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)

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The Clinton House does not have full- or part-time medical staff on site. Any victim of sexual abuse would be taken to St. Francis Hospital. St. Francis is certifies to provide emergency care and SAFE/SANE services.

**Standard 115.241 Screening for risk of victimization and abusiveness**

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

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

The Clinton House screens all residents for risk of victimization and abusiveness during the intake process. The screening is completed by the Case Manager within the first few hours of arrival at the facility. The screening instrument includes all criteria outlined by this standard.

Within the first thirty (30) days of arrival at the facility, the Case Manager and the resident meet and reassess their risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening.

Residents are not disciplined for refusing answer questions during the screening process.

Information obtained during the initial assessment and reassessment is placed in the residents file. Only authorized staff has access to these files.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
NJAC PREA Screening Checklist  
Case Manager Interview (Intake and Screening Interview Questions)  
Random Resident Interviews

**Corrective Action**

No corrective action needed

**Standard 115.242 Use of screening information**

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

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The Clinton House uses information from the resident’s risk assessment to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive.

Transgender or intersex resident’s housing and programming assignments are consider on a case-by-case basis, placement considers the resident’s health and safety, and whether the placement would present management or security problems. Transgender or intersex resident’s placement is reassessed as needed.

Transgender or intersex resident’s own views with respect to his or her own safety is given consideration.

Transgender and intersex residents are given the opportunity to shower separately from other inmates.

The Clinton House does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated units based solely on identification or status.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
NJAC PREA Screening Checklist  
Case Manager Interview (Intake and Screening Interview Questions)  
Random Resident Interviews

**Corrective Action**

No corrective action needed

**Standard 115.251 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)

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The Clinton House provides multiple internal and external ways for residents to privately report sexual abuse and sexual harassment. Information is provided at intake and posted in all resident rooms and common areas. Reports may be made verbally to a staff member or in writing to a supervisory or management staff. Phone numbers are provided for the Passaic County Women's Center Hot-line and the New Jersey Ombudsman's office. Residents were very aware of all reporting options.

#### **Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
Clinton House Resident Handbook (English/Spanish)  
NJAC PREA Posters  
Random Staff Interviews  
Random Resident Interviews

#### **Corrective Action**

No corrective action needed

#### **Standard 115.252 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)

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The Clinton House does not impose a time limit when a resident submits a grievance regarding an allegation of sexual abuse, nor does it require a resident to use an informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse. Resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint. The Clinton House insures the grievance is not refereed to the staff member who is the subject of the complaint. The Clinton House issues a final decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.

This time period does not include time consumed by residents in preparing any administrative appeal. The Clinton House may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The Clinton House notifies the resident in writing of any such extension and provides a date by which a decision will be made.

If the resident does not receive a response within the time allotted for reply, including any properly noticed extension, the resident may consider the absence of a response to be a denial at that level.

Third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, are permitted to

assist residents in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of residents. If a third party files such a request on behalf of a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process. If the resident declines to have the request processed on his or her behalf, the Clinton House documents the resident's decision.

The Clinton House has established procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse. After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, Staff immediately forwards the grievance to a level of review at which immediate corrective action is taken. An initial response is provided within 48 hours, and a final decision is made within 5 calendar days.

In the past twelve months the Clinton House has not received any grievances dealing with sexual abuse or harassment. Residents were aware that they could submit a grievance or emergency grievance to address sexual abuse and harassment.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
Clinton House Resident Handbook (English/Spanish)  
NJAC PREA Posters  
Random Staff Interviews  
Random Resident Interviews

**Corrective Action**

No corrective action needed

**Standard 115.253 Resident access to outside confidential support services**

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

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

The Clinton House provide residents with access to outside victim advocates for emotional support services related to sexual abuse. Residents are provided mailing addresses and toll-free telephone numbers. The Clinton House has a signed MOU with the Passaic County Women's Center to provide these services. Residents are aware of the extent to which such communications are monitored.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
Clinton House Resident Handbook (English/Spanish)  
NJAC PREA Posters  
Random Staff Interviews  
Random Resident Interviews

**Corrective Action**

No corrective action needed

**Standard 115.254 Third-party reporting**

PREA Audit Report

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

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

The Clinton House has processes to receive third-party reports of sexual abuse and sexual harassment. Information on how to make a third-party report is posted on the NJAC web-site. Residents were aware that third party reports could be made and would be addressed in the manner of a first hand report.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
 Clinton House Resident Handbook (English/Spanish)  
 NJAC PREA Posters  
 Random Staff Interviews  
 Random Resident Interviews

**Corrective Action**

No corrective action needed

**Standard 115.261 Staff and agency reporting duties**

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

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

Clinton House policy requires all staff immediately report and document sexual abuse and sexual harassment including third-party and anonymous reports. Staff is prohibited from discussing information related to sexual abuse reports with anyone other than those directly involved. During the initial intake assessment, the Case Manager informs Residents of their duty to report and limits of confidentiality.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
 Clinton House Resident Handbook (English/Spanish)  
 NJAC PREA Posters  
 Case Manager Interview (Intake and Screening Interview Questions)  
 Random Staff Interviews  
 Random Resident Interviews

**Corrective Action**

PREA Audit Report

No corrective action needed

**Standard 115.262 Agency protection duties**

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

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

Clinton House policy and training requires immediate action to protect residents that are at a substantial risk of sexual abuse. Resident risk levels are assessed on a regular basis and housing assignments may be changed if needed.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
Case Manager Interview (Intake and Screening Interview Questions)  
Random Staff Interviews  
Random Resident Interviews

**Corrective Action**

No corrective action needed

**Standard 115.263 Reporting to other confinement facilities**

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

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

The Clinton House has policies that address allegations that a Resident was sexually abused while confined at another facility; the policy requires the head of the facility to notify the head of the agency where the incident is alleged to have occurred. This notification is made within 72 hours of receiving the information and documented. The Program Supervisor was able to articulate this process during his interview.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
NJAC Compliance Director Interview  
Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.264 Staff first responder duties**

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

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

The Clinton House has a policy and provides training to all first responders which include the separation of the alleged victim and abuser; preservation and protection of the crime scene until appropriate steps can be taken to collect evidence; the collection of physical evidence, requesting that the alleged victim not take any actions that could destroy physical evidence, including, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and ensuring that the alleged abuser does not take any actions that could destroy physical evidence, including washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. Staff interviews showed a thorough understanding of their first responder duties.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
NJAC Staff Training Curriculum  
Random Staff Interviews

**Corrective Action**

No corrective action needed

**Standard 115.265 Coordinated response**

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

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

The Clinton House has a coordinated response plan which includes first responders, off site medical and mental health practitioners, NJDOC investigators, and facility leadership.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
NJAC Compliance Director Interview  
Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.266 Preservation of ability to protect residents from contact with abusers**

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

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

The Clinton House has space and ability to protect inmates from known abusers. Clinton House employees are not covered by a collective bargaining agreement. Nothing in policy prevents administrative staff from removing an employee during an investigation.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
NJAC Compliance Director Interview  
Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.267 Agency protection against retaliation**

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

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

The Clinton House has policies and processes in place to protect inmates and staff who report sexual abuse. Those that report are monitored for at least 90 days; the policy allows the monitoring period to be continued if necessary. The PREA Coordinator is responsible for monitoring for retaliation.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
NJAC Compliance Director Interview  
Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.271 Criminal and administrative agency investigations**

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

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

The Clinton House does not conduct investigations of sexual abuse or sexual harassment. All incidents are forwarded to the New Jersey Department of Corrections (NJDOC) or other outside law enforcement for investigation. All NJDOC investigators receive specialized PREA training.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
 NJAC Compliance Director Interview  
 Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.272 Evidentiary standard for administrative investigations**

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

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

Clinton House employees do not conduct any type of investigation. The New Jersey Department of Corrections (NJDOC) is responsible for all criminal and administrative investigations. NJDOC imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
 NJAC Compliance Director Interview  
 Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.273 Reporting to residents**

- Exceeds Standard (substantially exceeds requirement of standard)

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

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

The New Jersey Department of Corrections (NJDOC) is responsible for informing offenders as to whether allegations of sexual abuse have been determined to be substantiated, unsubstantiated, or unfounded. Facility staff meets with the resident to discuss the findings. Processes are in place to notify an offender of the outcome of an investigation involving staff sexual misconduct.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
 NJAC Compliance Director Interview  
 Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.276 Disciplinary sanctions for staff**

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

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

The Clinton House has a policy that addresses staff sexual misconduct. Sanctions include termination and criminal prosecution. Termination is the presumptive disciplinary sanction for staff that engages in sexual misconduct. Investigations are completed even if the employee chooses to resign. Random staff interviews showed a clear understanding that sexual misconduct is not acceptable.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
 NJAC Compliance Director Interview  
 Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.277 Corrective action for contractors and volunteers**

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

- Does Not Meet Standard (requires corrective action)

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

The Clinton House does not regularly use contractors or volunteers. However, Clinton House does have policies in place to address contractors or volunteers that may engage in sexual abuse of an offender. Additionally, all visitors to the Clinton House are required to sign for PREA related information.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
Visitor PREA Acknowledgment Form  
NJAC Compliance Director Interview  
Program Supervisor/PREA Coordinator Interview  
Random Staff Interviews

**Corrective Action**

No corrective action needed

**Standard 115.278 Disciplinary sanctions for residents**

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

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

The Clinton House forwards all allegations of resident sexual abuse and harassment to the NJDOC. NJDOC has a formal disciplinary process which addresses residents that engage in sexual abuse. Sanctions are commensurate with the nature and circumstances of the abuse committed, the resident’s disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories. NJDOC’s disciplinary process considers whether a resident’s mental status contributed to his behavior when determining what type of sanction to impose. NJDOC’s policy allow for the punishment of a resident for engaging in sexual contact with a staff member only if the staff member did not consent to the act. Resident interviews reveled a thorough understanding that sexual contact between residents and/or staff was not acceptable.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
Resident PREA Acknowledgement Form  
Clinton House Resident Handbook (English/Spanish)  
Case Manager Interview (Intake and Screening Interview Questions)  
Random Resident Interviews

**Corrective Action**

No corrective action needed

**Standard 115.282 Access to emergency medical and mental health services**

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

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

Upon receiving a report of sexual abuse, the Clinton House does not restrict access to emergency medical treatment. Victims are transferred to St. Francis Hospital and attended to by qualified medical staff at no charge. Victims of sexual abuse receive medical attention regardless of whether the victim names the abuser or cooperates with any investigation.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
 NJAC Compliance Director Interview  
 Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.283 Ongoing medical and mental health care for sexual abuse victims and abusers**

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

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

The Clinton House provides resident victims of sexual abuse, unimpeded access to emergency medical treatment and crisis intervention services. Resident victims of sexual abuse are offered timely information about and access to sexually transmitted diseases. Services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
 NJAC Compliance Director Interview  
 Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.286 Sexual abuse incident reviews**

- Exceeds Standard (substantially exceeds requirement of standard)

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

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

The Clinton House conducts a sexual abuse incident review at the conclusion of every sexual abuse investigation. Reviews are completed within 30 days of the conclusion of the investigation. The review team includes upper-level management staff, NJDOC investigators, and outside medical or mental health practitioners. The review team looks at all aspects that may have contributed to the incident including staffing levels and camera placement, policy needs, and motivating factors. The review team’s findings and recommendations are documented. In the twelve months prior to the onsite audit there have been no incidents which required an incident review.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
 NJAC Compliance Director Interview  
 Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.287 Data collection**

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

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

The Clinton House collects accurate, uniform data for every allegation of sexual abuse using a standardized instrument and set of definitions. Data is aggregated and reviewed annually. The Clinton House maintains reviews and collects data as needed from all available incident-based documents, reports, investigation files, and sexual abuse incident reviews.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
 NJAC Compliance Director Interview  
 Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.288 Data review for corrective action**

PREA Audit Report

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

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

The Clinton House reviews data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective action. The report is approved by the Compliance Director and made readily available to the public on the NJDOC website. Clinton House redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of the facility.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
 NJDOC Website - <http://www.state.nj.us/corrections/pages/PREA/PREA.html>  
 NJAC Compliance Director Interview  
 Program Supervisor/PREA Coordinator Interview

**Corrective Action**

No corrective action needed

**Standard 115.289 Data storage, publication, and destruction**

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

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

The Clinton House retains all documentation related to cases of sexual abuse and data collected as a result of these incidents. Annual reports are submitted to NJDOC and posted on their website.

**Policy, Materials, Interviews and Other Evidence Reviewed**

NJAC Policy 590-64.1 PREA Sexual Abuse and Harassment  
 NJDOC Website - <http://www.state.nj.us/corrections/pages/PREA/PREA.html>  
 NJAC Compliance Director Interview  
 Program Supervisor/PREA Coordinator Interview

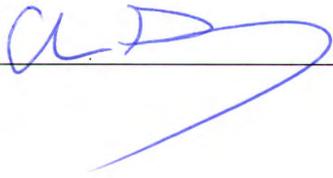
**Corrective Action**

No corrective action needed

**AUDITOR CERTIFICATION**

I certify that:

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

Chris Sweney  \_\_\_\_\_

09/12/2016 \_\_\_\_\_

Auditor Signature

Date