



Southwest Idaho  
Juvenile Detention Center  
Steven G. Jett, Director  
222 North 12<sup>th</sup> St. Caldwell, ID 83605  
(208) 454-7353 FAX (208)454-7461

Dear Juvenile Justice Service Worker:

As you may or may not know, the Southwest Idaho Juvenile Detention Center became the first juvenile facility in the nation to undergo a PREA Audit. I accepted a challenge put forth at the first DOJ/BJA/PRC-sponsored auditor training session to have my facility audited as soon as possible so that subsequent auditor training groups could learn from our experience.

I do not want to limit this learning experience to only the next auditor group. I would like all to receive the benefit of my audit, so I have submitted this to the National Partnership for Juvenile Services for distribution through their mailing list.

The audit process was a great experience for me. However, if you are not open to have another set of eyes look deeply into your operation, it will not be the same for you. Auditors will ask for documentation far beyond your policy manual. They will talk to outside agencies such as your community based victim's advocates, public defenders, local law enforcement agencies, etc. Auditors MUST be convinced that each and every standard is being applied consistently. That is what the entire process is designed for. Be ready for that.

If you are just beginning to prepare your facility for PREA Compliance, I would strongly encourage you to take the following step immediately, (if you haven't already done so):

- Accurately complete the PREA Toolkit for your facility and have your PREA Coordinator and other line staff assist you in the process. Their input is valuable.
  - If you don't think you have something in place, be honest and do not be afraid to answer 'NO.' If you are not sure or cannot produce written proof of your practices, your auditor will probably get the red pen out. You don't want that.
  - The toolkit is available through the PREA Resource Center (PRC) website ([www.prearesourcecenter.org](http://www.prearesourcecenter.org)).

Many people may think that the fact that I am a certified PREA auditor might have given me an advantage in preparing for the audit. Maybe so. However, the vast majority of material that was covered in the Auditor Training is found in the Audit Instrument, which is also available publicly at the link above.

- Download the Audit Instrument and become very familiar with every one of the 13 files contained in the instrument.
  - At the time of this document (10/16/2013) only the Prisons and Jails Audit Instrument was available, but it is significantly similar to the unreleased juvenile instrument.
  - Do not wait for the juvenile instrument.

Nothing at all about the audit process will be a surprise to you if you become very familiar with the entire Audit Instrument.

I would encourage you to completely fill out the Pre-Audit Questionnaire BEFORE contracting with your auditor. There may be a limited amount of time from the contract signing until the audit, and it would probably be uncomfortable for you to be looking over the questionnaire for the first time while under a time crunch. In addition, completing the questionnaire prior to contacting the auditor will give you a little additional time if you come across something that will need to be put in place before the audit, such as updating a policy, training staff, or implementing a new log to improve documentation of practice.

Organize your policy documents. As you do the Pre-Audit Questionnaire, make sure you specify clearly where each of the policies are located. The auditor does NOT want to have to look through your policies trying to find stuff. You probably do not want the auditor spending a lot of time needlessly searching for stuff. As you have guessed, auditors do not work for free.

Organize your supporting documentation. What are the auditors looking for when it comes to supporting documents? In the Audit Instrument, there are two files entitled: "Checklist of Documentation" and "Handbook\_PREA\_COMPLIANCE\_MEASURES..." Become very familiar with them.

Train your staff. Make sure you can produce training curriculum that covers all 11 points listed in 115.331 (a). Also train your staff on your policies, especially those related to PREA. Get your training attendance records ready. Also make sure your employees, contractors and volunteers have signed the documents that satisfy 115.331 (d) saying that they understand the training they received. (Auditors will also be testing your employee's knowledge of the training when they do the interviews. So you can have the documentation that they received the training, but if several of your employees say they don't remember it, or cannot reiterate substantial portions of the training, the auditor will probably get the red pen out. You don't want that. )

Auditors have been instructed not to be investigators. They are not in your facility trying to find you out of compliance, they want you to be in compliance. For example, if the auditor asks if you had any reported sexual abuse incidents in the past 12 months, and you say, "no," they will probably not ask to read every single incident report trying to find something to prove you wrong. But remember this, if you tell the auditor that you had no reported sexual abuse reports, and during a subsequent staff interview the auditor is told of incidents that were not investigated, then the auditor will start asking questions. Be honest.

You may find that the standard dealing with investigations may be difficult to comply with if the investigations are conducted by an outside agency that you have no control over. Get in touch with that agency before the audit and see what they have as far as policy, etc. The auditor should be calling them anyway, so it may be better if they have a "heads up."

I would hope that juvenile agencies are already taking into consideration some, most, or all of the factors listed in 115.341 to assess vulnerability, and making good housing and placement decisions based on the information received. If you do not have the process in writing, then the

auditor will probably determine that you have no process in place at all because you have no real means of applying it uniformly and consistently. Put the process in writing.

I can go on about each separate standard, but I hope you are getting the message. Remember this—The PREA Audit is not a policy-based audit. If it was, then the audit could take place without an auditor ever stepping into your facility, you could just email your policies and the auditor could just go down the checklist. The PREA Audit is an audit of your culture. Train to your policies. Hold staff accountable based on your policies. Set the bar high and be clear that sexual abuse is not an acceptable part of any stay in a confinement facility...for anyone.

Positive attitudes starting with leadership are essential with PREA. If you as the facility administrator have talked about PREA as “another pain in the butt kind of thing sent down from the Feds,” then your staff are going to feel the same way. However, if your staff have observed you embracing the points set out in the standards as a way to improve your service delivery to the kids in your custody, then your audit should be a positive experience.

Disclaimer and fine print:

Nothing in this document should be construed to be a standard or something that you should show your auditor to prove you did everything you need to do to be compliant during your audit. I am NOT publishing this document to do that. I am doing it just to give you a feel for our audit.

I would love to take the time to talk to each of you individually, but I simply cannot do so. I felt that this would be the best way for me to give you information regarding our audit experience that might be helpful, but still alleviate the need for me to spend an inordinate amount of time on the phone, which my employers would not like. However, if I haven't answered your questions AND you cannot find it in the Audit Instrument, please contact me through email at [sjett@canyonco.org](mailto:sjett@canyonco.org) with your specific question.

The Southwest Idaho Juvenile Detention Center website page can be found at <http://canyonco.org/swijdc>. There is a link to our PREA Compliance page on the left hand side. This may give you an idea of the kinds of information that needs to be published on your website. (I will give no guarantee that the SWIJDC website will satisfy an auditor, nor will I claim that I am PREA Compliant with any standard until after my final report is issued, which will be published and accessible through the website listed above.)

Good luck with your upcoming audit!

Steve Jett  
Director, SW Idaho Juvenile Detention Center  
Immediate Past President, National Partnership for Juvenile Services' Council for Detention  
DOJ-Certified PREA Auditor-Juvenile Facilities