



PRISON RAPE ELIMINATION ACT IMPLEMENTATION POLICY

POLICY STATEMENT

It is the policy of Mirror to provide a safe and secure environment for all residents. Residents have the right to be free from all sexual abuse and sexual harassment; Mirror has a “zero tolerance” for such actions. Each facility shall implement a Coordinated Response which includes prevention, detection, response, and prosecution/discipline of assailants. This policy targets sexual abuse and sexual harassment of residents whether by staff or by other residents.

DEFINITIONS [DOJ § 115.225]

Exigent Circumstances: Any set of temporary or unforeseen circumstances requiring immediate action to combat a threat to the security or institutional order of the facility.

Facility PREA Compliance Manager (PCM): A person designated by the Vice President or Director at each facility, as having overall responsibility for ensuring all elements of the Coordinated Response to Sexual Abuse and Harassment are met in a coordinated fashion.

Intersex: A person who’s sexual or reproductive anatomy or chromosomal pattern does not seem to fit typical definitions of a male or female. Intersex medical conditions are sometimes referred to as disorders of sex development.

PREA Coordinator: A staff member appointed by the Vice President to develop, implement, and oversee Departmental efforts to comply with the national PREA standards.

LGBTI: An acronym which refers to those who are gender non-conforming and stands for Lesbian, Gay, Bisexual, Transgender, or Intersex.

Gender Nonconforming: a person whose appearance or manner does not conform to traditional societal gender expectations.

PREA: Prison Rape Elimination Act. An Act signed into law with the goal of preventing, detecting, and responding to sexual abuse occurring in confinement facilities.

PREA-RELATED: Relating to a report of investigation of sexual abuse or sexual harassment of a resident.

SAFE: Acronym for Sexual Assaults Forensic Examination, which is conducted by a SANE (Sexual Assault Nurse Examiner) to collect physical evidence following a sexual assault.

SAIR: Acronym for Sexual Abuse Incident Review, a review by the sexual Abuse Incident Review Board (SAIRB) at the conclusion of every sexual abuse investigation which has been disposed as a substantiated or unsubstantiated.

SANE: Acronym for Sexual Assault Nurse Examiner; medical staff specially trained in the examination and collection of forensic evidence pursuant to a sexual assault.

What is PREA?

The Prison Rape Elimination Act (PREA) was enacted by the United States Congress in 2003 to address the problem of sexual abuse of people in the U.S. correctional agencies. The act applies to all public and private institutions which house adult or juvenile residents/residents. It addresses both resident-on-resident sexual abuse and staff sexual misconduct.

Mirror PREA Policy

PURPOSE

Mirror is committed to zero tolerance of any form of sexual abuse and sexual harassment in facilities it operates directly or with which it holds contracts for the confinement of residents. The purpose of this policy is to describe Mirror's mandate of zero tolerance toward all forms of sexual abuse and sexual harassment; and to outline our approach to preventing, detecting, and responding to sexual abuse and harassment.

PREA COORDINATOR [DOJ § 115.211(b)]

Mirror has designated a PREA Coordinator with sufficient time and authority to develop, implement, and oversee its efforts to comply with the PREA standards. The PREA Coordinator shall be the Vice President of Community Integration, or someone designated by the person, in writing. The PREA Compliance Manager shall be the Director of Federal Programs at each Mirror facility.

ZERO TOLERANCE POLICY [DOJ § 115.211(a)]

Mirror, Inc. mandates zero tolerance toward all forms of sexual abuse and sexual harassment. Sexual abuse of a resident and sexual harassment of a resident are prohibited.

A. Definitions [DOJ § 115.225]

- (1) "Resident" means any person confined to a Mirror Facility;
- (2) "Staff" means an agency employee;
- (3) "Contractor" means a person who provides services on a recurring basis pursuant to a contractual agreement with the agency;
- (4) "Volunteer" means an individual who donates time and effort on a recurring basis to enhance the activities and programs of the agency; and,
- (5) "Consent" refers to cooperation in act or attitude pursuant to an exercise of free will and with full understanding of the nature of the act. Residents cannot consent to sexual contact with staff members, volunteers, or contractors.

B. Sexual Abuse DOJ § 115.226]

- (1) "Sexual abuse" includes—
 - (a) Sexual abuse of a resident by another resident; and
 - (b) Sexual abuse of a resident by a staff member, contractor, or volunteer.
- (2) Sexual abuse of a resident by another resident includes any of the following acts, if the victim does not consent, is coerced into such an act by overt or implied threats of violence, or is unable to consent or refuse:
 - (a) Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;
 - (b) Contact between the mouth and the penis, vulva, or anus;
 - (c) Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument; and
 - (d) 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.
- (3) Sexual abuse of a resident by a staff member, contractor, or volunteer includes any of the following acts, with or without consent of the resident:
 - (a) Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;
 - (b) Contact between the mouth and the penis, vulva, or anus;
 - (c) Contact between the mouth and any body part where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;
 - (d) Penetration of the anal or genital opening, however slight, by a hand, finger, object, or other instrument, is unrelated to official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;
 - (e) Any other intentional contact, either directly or through the clothing, of or with the genitalia, anus, groin, breast, inner thigh, or the buttocks, is unrelated to official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;

- (f) Any attempt, threat, or request by a staff member, contractor, or volunteer to engage in the activities described in paragraphs (a) through (e) of this section.
- (g) Any display by a staff member, contractor, or volunteer of his or her uncovered genitalia, buttocks, or breast in the presence of an inmate; and
- (h) Voyeurism by a staff member, contractor, or volunteer. Voyeurism by a staff member, contractor, or volunteer means an invasion of privacy of an inmate by staff for reasons unrelated to official duties, such as peering at a resident who is using a toilet in his or her cell to perform bodily functions; requiring a resident to expose his or her buttocks, genitals, or breasts; or taking images of all or part of an inmate's naked body or of an inmate performing bodily functions.

C. Sexual Harassment [DOJ § 115.225]

(1) "Sexual harassment" includes—

- (a) Sexual harassment of a resident by another resident; and
- (b) Sexual harassment of a resident by a staff member, contractor, or volunteer.

(2) Sexual harassment of a resident by another resident includes:

Repeated and unwelcome sexual advances, requests for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by a resident directed toward another.

(3) Sexual harassment of a resident by a staff member, contractor, or volunteer includes:

Repeated verbal comments or gestures of a sexual nature to a resident by a staff member, contractor, or volunteer, including demeaning references to gender, sexually suggestive or derogatory comments about body or clothing, or obscene language or gestures.

PREVENTING AND DETECTING SEXUAL ABUSE AND HARASSMENT [DOJ § 115.211]

Mirror shall adopt and implement the following measures to prevent and detect sexual abuse and sexual harassment in its facility:

A. Staffing Plan/Video Monitoring [DOJ §115.213]

(1) In the process of creating and revising a staffing plan to provide for adequate levels of staffing and video monitoring to protect residents against sexual abuse, Mirror shall ensure the following factors are taken into consideration:

- (a) Generally accepted detention and correctional practices;
- (b) Any judicial findings of inadequacy;
- (c) Any findings of inadequacy from Federal investigative agencies;
- (d) Any findings of inadequacy from internal or external oversight bodies;
- (e) All components of the facility's physical plan;
- (f) The composition of the resident population;
- (g) The number and placement of supervisory staff;
- (h) Programs occurring on a particular shift;

- (i) Any applicable State or local laws, regulations, or standards;
- (j) The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and
- (k) Any other relevant factors.

(2) Mirror shall make its best efforts to comply with the staffing and video monitoring plan and, in circumstances where it is not complied with, shall document and justify all deviations.

(3) Staffing adjustments are addressed as each schedule is prepared. Schedules are prepared for four-week time periods by the Chief of Security or Facility Director. At least once every year, and in collaboration with the PREA Coordinator, Mirror shall conduct an assessment to determine whether adjustments are needed to the staffing plan and the deployment of video monitoring systems and other technologies.

Contracting with Other Entities for the Confinement of Residents [DOJ §115.212]

Mirror does not contract with other entities for the confinement of residents.

Cross Gender Viewing and Searches/Searches of Transgender Residents [DOJ §115.215]

(1) Searches

- (a) Mirror does not conduct cross-gender strip searches (meaning a search which a person is directed to remove or arrange clothing so as to permit a visual inspection of their breasts, buttocks, or genitalia).
- (b) Mirror shall not search or physically examine a transgender resident for the sole purpose of determining a resident's genital status. If the gender assignment of a resident arises, the Facility Director will be contacted.

Mirror prohibits all strip searches, body cavity searches, and does not permit cross gender pat down searches unless done so in exigent circumstances. If a cross gender pat search is done in an exigent circumstance, it will be documented and reviewed by PCM and the PREA Coordinator.

Viewing [DOJ §115.215 (d)]

- (a) The facility shall enable residents 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 (this includes viewing via video camera).
- (b) Staff members of the opposite gender shall announce their presence when entering living areas of residents, hallways, restrooms, and shower areas.
- (c) Staff does not restrict movement or programming of any resident if a staff member of the same gender is unavailable to do a search. If the situation arose where a staff member of the same gender is unavailable, a search will be conducted using the metal detector and/or handheld metal detector.

Residents with Disabilities or Who Have Limited English Proficiency

(1) Disabled Residents [DOJ § 115.216 (a)]

(a) Mirror shall take appropriate steps, by partnering with the YWCA: Sexual Assault & Domestic Violence Prevention Center to ensure residents with disabilities have equal opportunity to benefit from all aspects of our efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include – when necessary to ensure effective communication with residents who are deaf or hard of hearing – providing access to interpreters who can interpret effectively, accurately, and impartially.

Note: Residents with disabilities includes residents who are deaf, hard of hearing, blind or have low vision, and those who have intellectual, psychiatric, or speech disabilities.

(b) In addition, Mirror shall ensure written materials are provided in formats and through methods which ensure effective communication with residents with disabilities.

(2) Residents Who Have Limited English Proficiency [DOJ § 115.216(b)]

(a) Mirror staff shall take reasonable steps to ensure meaningful access to all aspects of its efforts to prevent, detect, and respond to sexual abuse and sexual harassment to resident's who have limited English proficiency, including by providing interpreters who can interpret effectively, accurately, and impartially. Mirror has a contract with Universe Translation Services to utilize when such translation services are necessary. To reach an interpreter, staff will call **1-866-740-8007**, which will be done so in the privacy of a vacant office. Staff will use the agency code: **4068** to reach a prompt for the specific language requiring interpretation. After selecting the agency code, you will be prompted for a Local Office Pin (Topeka RRC is **5525**). All translation services will be provided at no cost to the resident making the report. If staff have any technical difficulties, the provided support number is 800-428-6149. On a monthly basis, the translation service will be tested by staff to ensure there are no interruptions in service.

(b) Within 24 hours of initial arrival, RRC tech staff will review the Resident PREA Handbook with all new residents. After this handbook has been reviewed, tech staff and the resident will both sign and date to acknowledge this handbook has been reviewed. Case managers will then individually go over Resident PREA Handbooks during Initial Program Plan, which will ensure all residents are aware of their PREA rights. Case managers will then note this interaction in the Individualized Program Plans, which takes place within 7 days of initial arrival.

(3) Use of Resident Interpreters [DOJ § 115.216(c)]

Mirror shall not rely on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise a resident's safety, the performance of first-responder duties, or the investigation of a resident's allegations.

Screening of Residents

- (1) Screening for Risk of Victimization and Abusiveness [DOJ §115.241]
 - (a) All residents shall be assessed during an intake screening and upon transfer from another facility for their risk of being sexually abused by other residents or sexually abusive toward other residents.
 - (b) Intake screening shall be completed immediately upon arrival for all new residents to the facility.
 - (c) Such assessments shall be conducted using an objective screening instrument.
 - (d) The intake screening shall consider, at a minimum, the following criteria to assess for risk of sexual victimization:
 - (d1) Whether the resident has a mental, physical, or developmental disability;
 - (d2) The age of the resident;
 - (d3) The physical build of the resident;
 - (d4) Whether the resident has previously been incarcerated;
 - (d5) Whether the resident's criminal history is exclusively nonviolent;
 - (d6) Whether the resident has prior convictions for sex offenses against an adult or child;
 - (d7) Whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
 - (d8) Whether the resident has previously experienced sexual victimization;
 - (d9) The resident's perception of his or her own vulnerability to sexual abuse or sexual harassment; and
 - (e) The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to Mirror, in assessing residents for risk of being sexually abusive.
 - (f) Mirror staff shall reassess the resident's risk of victimization or abusiveness based upon any additional, relevant information received since the intake screening.
 - (f1) Residents will receive a second screening no later than 30 days following arrival, which will be conducted again by Mirror staff.
 - (g) A resident's risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information bears on the resident's risk of sexual victimization or abusiveness.
 - (h) Resident's may not be disciplined for refusing to answer, or for not disclosing complete information related to, (d1), (d7), (d8) and (d9) above.
 - (i) The Facility Director, Case Managers, Correctional Technician staff, Federal Probation Officer, and PCM will have access to the information from the screening instruments and shall implement appropriate controls on the dissemination of responses to questions asked pursuant to this policy to ensure sensitive information is not exploited to the resident's detriment by staff or other residents. Release of information may also include the Federal Bureau of Prisons.

(2) Use of Information Obtained from Screening [DOJ §115.242]

- (a) The Mirror Facility Director or designee shall use information from the risk screening 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. Upon initial arrival, RRC staff will administer the risk screening tool, which will then be passed directly to the Facility Director. These tools will be utilized throughout a resident's placement at the RRC to ensure the safety and security of all residents. The Facility Director will pass on all pertinent information to security staff once risk is determined through the use of the screening tool.
- (b) Mirror will make all effort to house high-risk potential abusers and high-risk potential victims in separate rooms or in separate dorms. Should a resident need to be housed in the same room as high-risk potential victims, the resident will be housed closest to the entrance of the door for high visualization by staff when doing rounds.
- (c) In deciding whether to assign a transgender or intersex resident to a facility for male or female residents, and in making other housing and programming assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether the placement would present management or security problems.
- (d) Placement and programming assignments for each transgender or intersex resident shall be reassessed at least twice each year to review any threats to safety experienced by the resident.
- (e) A transgender or intersex resident's own views with respect to his or her own safety be given serious consideration.
- (f) Transgender and intersex residents shall be given the opportunity to shower separately from other residents.
- (g) Mirror shall not place lesbian, gay, bisexual, transgender, or intersex residents in dedicated facilities, units, or wings solely based on such identification or status unless pursuant to a legal settlement or judgment.

Hiring and Promotion Practices [DOJ §115.217]

- (1) Mirror shall not hire or promote anyone who may have contact with residents, or retain the services of any contractor who may have contact with residents, who:
 - (a) Has engaged in sexual abuse and or sexual harassment in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution; or,
 - (b) Has been convicted of, or civilly or administratively adjudicated for, engaging, or attempting to engage in sexual activity in the community facilitated by force, threats of force, or coercion, or if the victim did not consent or was unable to consent.
- (2) Mirror shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to retain the services of any contractor, who may have contact with inmates.
- (3) Before hiring new employees, who may have contact with residents, Mirror shall:

(a) Perform a criminal background records check and child abuse registration: and, Make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse, sexual harassment, or any resignation during a pending investigation of an allegation of sexual abuse or sexual harassment.

(4) Mirror shall also perform a criminal background records check before retaining the services of any contractor who may have contact with residents.

(5) Mirror shall either conduct criminal background records checks through, State, Federal, and local agencies. For employees working with Federal residents, the Bureau of Prisons performs background screenings prior to the prospective employee working with federal residents. For employees working with Federal residents, background checks are performed with the award of each contract as well. Mirror shall conduct criminal background and record checks at least once every five years on current employees and contractors who may have contact with residents. Prior to promoting any current employee, a new criminal records check will be completed before the promotion occurs.

(6) Mirror shall ask all applicants and employees who may have direct contact with residents about previous misconduct described in this section, in:

(a) Written applications and/or interviews for hiring or promotion; and,

(b) Interviews or written self-evaluations conducted as part of reviews of current employees.

(7) Mirror shall impose on its current employees a continuing affirmative duty to disclose any of the misconduct described in this section.

(8) Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

(9) Unless prohibited by law, Mirror shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.

Upgrades to Facilities and Technologies [DOJ §115.218]

(1) When designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, Mirror shall consider the effect of the design, acquisition, expansion, or modification on its ability to protect residents from sexual abuse.

(2) When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, Mirror shall consider how such technology may enhance its ability to protect residents from sexual abuse.

RESPONDING TO REPORTS OF SEXUAL ABUSE AND SEXUAL HARASSMENT

To respond to reported incidents of sexual abuse, Mirror has adopted and implemented the following processes:

A. Procedures for Reporting Sexual Abuse and Sexual Harassment

(1) Resident Reporting

(a) Ways for Residents to Report Incidents [DOJ §115.251 (a), (b), and (c)]:

(a1) Mirror shall provide multiple internal ways for residents to privately report sexual abuse and sexual harassment, retaliation by other or staff for reporting sexual abuse or sexual harassment, and staff neglect which may have contributed to such incidents. Mirror does not house residents who are detained solely for immigration issues. Residents may report concerns by:

- i. Reporting the incident to a staff member*
- ii. Reporting the incident to the Facility Director of PREA Coordinator*
- iii. In the locked grievance box*
- iv. Anonymously to the Federal Bureau of Prisons (address and phone numbers are posted on bulletin boards in all Residential Reentry Centers.*
- v. Making a report online directly to mirrorinc.org*

(a2) Mirror shall also provide at least one way for residents to report abuse, harassment, retaliation, and staff neglect to a public or private entity not part of Mirror, and is able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials, allowing the resident to remain anonymous upon request. Residents may report concerns by:

- i. The use of the telephone*
- ii. The use of their cell phones*
- iii. The use of email*

(a3) Staff shall accept reports made verbally, in writing, and anonymously. Staff shall immediately document any verbal reports.

(b) Resident Grievances [DOJ] § 115.252 (a), (b), (c), (e) and (g)]

(b1) Mirror shall not impose a time limit on when a resident may submit a grievance regarding an allegation of sexual abuse.

(b2) Mirror shall not require a resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

(b3) Mirror shall ensure —

- i. A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and*
- ii. Such grievance is not referred to a staff member who is the subject of the complaint.*

(b4) Mirror shall issue 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. Computation of the 90-day time period shall not include time consumed by resident in preparing any administrative appeal.

(b5) Mirror 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 and shall notify the resident in writing of any such extension and provide a date by which a decision shall be made.

b6) At any level of the administrative process, including the final level, if the resident does 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 this level.

(b7) Mirror along with the contracted agency may discipline a resident for filing a grievance related to alleged sexual abuse only where the agency demonstrates the inmate filed the grievance in bad faith.

(2) Protection of Residents Facing Substantial Risk [DOJ §115.262 and DOJ §115.252(f)]

(a) Upon Learning of Substantial Risk [DOJ §115.262]

When Mirror learns a resident is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the resident.

(b) Emergency Grievances [DOJ §115.252 (f)]

(c) Mirror has the following procedure for the filing of an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse.

(d) After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, Mirror staff shall:

(d1) Immediately forward the grievance to the Facility Director for immediate corrective action may be taken;

(d2) Provide an initial response within 48 hours; and

(d3) Issue a final decision within five (5) calendar days.

(e) Documentation and action taken to determine whether the resident was at substantial risk of imminent sexual abuse will be filed with the PREA Coordinator.

(3) Staff Reporting Rules [DOJ §115.251(d) and §115.261]

(a) Any staff member who has knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment; retaliation against residents or staff who reported such an incident; and any staff neglect may have contributed to such incident or retaliation, shall immediately report such incident or retaliation, to the Facility Director or PREA Coordinator.

(b) Apart from reporting to designated supervisors or officials, staff shall not reveal any information related to a sexual abuse report to anyone except those who have a need to know.

Note: Medical and mental health practitioners shall report knowledge, suspicion, or information regarding sexual abuse, sexual harassment, retaliation, or staff neglect pursuant to this section. This information shall be provided to residents, in writing, at the initiation of services.

(c) Mirror staff may privately report sexual abuse and sexual harassment of residents to:

- Topeka Facility Director, Melissa Goodman, at 2201 SE 25th Topeka, KS 66605

(5) Rules for Third Parties to Report Abuse and to Assist Residents with Grievances [DOJ §115.251(c), §115.252 (e), and § 115.254]

- (a) Third-party reports of sexual abuse and sexual harassment can be made to fellow residents, family members, attorneys, and outside advocates. Information on how to report sexual abuse and sexual harassment on behalf of a resident can be found at www.mirrorinc.org.
- (b) Staff shall accept reports made verbally, in writing, and anonymously from third parties and shall promptly document any verbal reports.
- (c) Third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, shall be 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.
- (d) If a third-party files such a request on behalf of a resident, the facility may require as a condition of processing the request 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, Mirror shall document the resident's decision.

Coordinated Response [DOJ § 115.265]

In an effort to ensure the victim receives the best possible care and investigators have the best chance of apprehending the perpetrator, Mirror will coordinate the following:

- (1) Assess the victim's acute medical needs.
 - (a) This be done by the first responder and hospital staff
- (2) Inform the victim of his/her rights under relevant Federal and State law.
 - (a) This shall be done by the responding Local Law Enforcement
- (3) Explain the need for a forensic medical exam and offering the victim the option of undergoing one, within 92 hours.
 - (a) This shall be done by the responding Local Law Enforcement
 - (b) This shall be done at no cost to the victim
- (4) Offer the presence of victim advocate or qualified staff member during the exam.
 - (a) This shall be done by the PREA Coordinator
- (5) Provide crisis intervention counseling through the YWCA in Topeka and WASAC in Wichita.
 - (a) This shall be done by the PREA Coordinator
- (6) Interview the victim and any witnesses.
 - (a) This shall be done by the PREA Coordinator, health care professionals, victim advocates, and law enforcement officials
- (7) Collect evidence.
 - (a) First responders' duties are to protect the evidence until Local Law Enforcement respond.
 - (b) First Responder and staff on duty will secure the area, making sure no evidence is removed, tampered with or destroyed.
- (8) Provide for any special needs the victim may have.
 - (a) This shall be done by the PREA Coordinator

During this process, the First Responder will have delegated to other staff to contact 911, Facility Director and PREA Coordinator.

Immediate Steps after Receiving Report of Incident [DOJ §115.264 and §115.282 (b)]

- (1) When a security staff first-responder learns a resident has been sexually abused, they shall take immediate action by;
 - (a) Separate the victim from the alleged perpetrator;
 - (a1) Victim shall be escorted to an administrative office;
 - (b) Contact Law Enforcement;
 - (c) Preserve and protect any crime scene by remaining at the scene of the alleged crime until Law Officials arrive; and,
 - (d) If the abuse occurred within a time period allows for the collection of physical evidence, request the alleged victim—and ensure the alleged abuser—not take any actions which could destroy physical evidence, including washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and,
 - (d) Immediately notify the appropriate medical and mental health practitioners.

[115.82 (b)]

- (2) When the first staff responder is not a security staff member, they shall request the alleged victim not take any actions which could destroy physical evidence, and then notify security staff.

Note: The Department of Justice (DOJ) defines “first responder” as the staff person (or persons) who first arrives at the scene of an incident.

Medical and Mental Health Services

- (1) Emergency [DOJ §115.282]

- (a) Resident victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. At Stormont Vail (Topeka), examinations are conducted by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs).
- (b) Resident victims of sexual abuse while incarcerated shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.
- (c) Treatment services shall be provided to the victim—without financial cost to the victim—and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Forensic medical examinations are offered without financial cost to the victim.

- (2) Ongoing Medical and Mental Health Care [DOJ §115.283]

- (a) The facility shall offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been sexually abused in a prison, jail, lockup, community corrections facility, or juvenile justice facility.

- (b) The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.
- (c) The facility shall provide such victims with medical and mental health services consistent with the community level of care.
- (d) Resident victims of sexually abusive vaginal penetration at Mirror RRC shall be offered pregnancy tests, as medically necessary.
- (e) If pregnancy results from the conduct described in this section, victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services, such as prenatal care and access to pregnancy termination services, where available.
- (f) Resident victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections, as medically appropriate.
- (g) Ongoing treatment services shall be provided to the victim without financial cost to the victim and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Support Services for Victims of Sexual Abuse

(1) Victim Advocate [DOJ § 115.221(d)(e) and (h)]

(a) Mirror shall attempt to make available to the victim an advocate from a rape crisis center (YWCA in Topeka). If a rape crisis center is not available to provide victim advocacy services, a qualified staff member from a community-based organization, or a qualified agency staff member will be made available to provide these services.

Note: A “qualified agency staff member” or a “qualified community-based staff member” means an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual assault and forensic examination issues in general.

(b) When requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member shall accompany the victim throughout the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals.

(2) Emotional Support Services [DOJ § 115.253]

(a) Mirror residents can access outside victim advocates for emotional support services related to sexual abuse by contacting the agencies on the PREA bulletin board. The information contains the mailing addresses and telephone numbers of local, State, or national victim advocacy or rape crisis organizations.

Reasonable communication between residents and these organizations and agencies will be available in as confidential a manner as possible.

(b) Communication between the resident and outside agencies will be monitored and forwarded to authorities in accordance with mandatory reporting laws.

(c) YWCA are the community service providers used to provide inmates with confidential emotional support services related to sexual abuse. Periodically, the hotline numbers for YWCA will be tested to ensure they are active lines.

Additionally, a staff member of the YWCA is invited to attend quarterly CRB meetings at the RRC.

Investigation of Incidents [DOJ §§ 115.221(a)(b)(c)(f) and(h), 115.222, 115.271, 115.272, 115.273 and 115.286]

- (1) Mirror shall ensure an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including resident-on-resident sexual abuse or staff sexual misconduct). As outlined in our Statement of Work with the Bureau of Prisons, Mirror will collaborate with the Bureau to conduct any and all investigations including sexual abuse or sexual harassment.
- (2) It is Mirror policy to ensure allegations of sexual abuse or sexual harassment are referred for investigation to a law enforcement agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. This policy can be viewed on the Mirror website - www.mirrorinc.org.
- (3) All investigations into allegations of sexual abuse and sexual harassment conducted by Mirror Facility Director and PREA Coordinator services will be done promptly, thoroughly, and objectively, and include third-party and anonymous reports.
- (4) Where sexual abuse is alleged, Mirror shall use law enforcement officials to investigate. Mirror shall request the investigating agency follow the DOJ requirements pertaining to investigations of incidents.
 - (a) Topeka Police Department will be immediately notified through joint communications in the event of a sexual assault.
 - (b) Mirror will obtain the report number from the responding Officers.
 - (c) Mirror will stay in contact with the local Prosecuting Attorney's Office (Shawnee County for RRC Topeka)
- (5) Mirror imposes a standard of a preponderance of evidence or a lower standard of proof when determining whether allegations of sexual abuse or sexual harassment can be substantiated.
- (6) The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation.
- (7) When other agencies investigate sexual abuse, Mirror shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.
- (8) Following an investigation into a resident's allegation they suffered sexual abuse, Mirror shall inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.
- (9) If Mirror did not conduct an investigation, it shall request the relevant information from the investigative agency in order to inform the resident. When Mirror receives a report a resident has been abused while housed at another facility, the facility PCM will report the

abuse to the facility where the alleged abuse occurs. All reporting will be documented and reviewed by Mirror PREA Coordinator. There is no time limit on Mirror accepting a report of a resident being abused while housed at another facility.

(10) Following a resident's allegation, a staff member committed sexual abuse against the resident, Mirror shall subsequently inform the resident whenever:

- (a) The staff member is no longer posted within the resident's unit;
- (b) The staff member is no longer employed at the facility;
- (c) Mirror learns the staff member has been charged with or indicted on a charge related to sexual abuse within the facility; or,
- (d) Mirror learns the staff member has been convicted on a charge related to sexual abuse within the facility.

(11) Following a resident's allegation they have been sexually abused by another resident, Mirror shall subsequently inform the alleged victim whenever:

- (a) Mirror learns the alleged abuser has been charged with or indicted on a charge related to sexual abuse within the facility; or
- (b) Mirror learns the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

All such notifications or attempted notifications shall be documented. Mirror's obligation to report under this standard shall terminate if the inmate is released from the agency's custody. [DOJ § 115.273]

(12) Sexual abuse incident reviews [DOJ § 115.286]

(a) A review team, consisting of the Facility Director, PREA Coordinator, Vice President of Community Integration, upper-level management and the Chief of Security shall conduct a sexual abuse incident review within 30 days of the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded. Information from investigators and medical personnel will be included. The review team shall:

- (a1) Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;
- (a2) 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;
- (a3) Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;
- (a4) Assess the adequacy of staffing levels in areas during different shifts;
- (a5) Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff;
- (a6) Did staff actions lead to or prevent the occurrence of sexual abuse or harassment.

(13) Following the review, a report of its findings, determinations, and any recommendations for improvement will be submitted to the CEO of Mirror, Inc. Improvements which were implemented as a result of the review will be documented in the final report. Mirror retains all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

Specialized Training: Investigations [DOJ §115.234]

- (1) In addition to the general training provided, Mirror will have a staff member trained to the extent of involvement for conducting investigations.
- (2) Specialized training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Such training will be documented of the completed specialized training in conducting investigations.
- (3) Mirror does not conduct sexual abuse investigations; the Topeka Police Department has the legal authority to do so if a report is criminal in nature.

Protection from Retaliation [DOJ §115.267]

Note: For rules regarding reporting by residents and staff of retaliation after it has occurred, see Section 5. A. (Procedures for Reporting Sexual Abuse/Sexual Harassment) above.

- (1) Mirror shall protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff.
- (2) Protection measures will include housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services for resident or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.
- (3) For at least 90 days following a report of sexual abuse, Mirror shall monitor the conduct and treatment of residents or staff who reported sexual abuse, and of resident who were reported to have suffered sexual abuse, to see if there are changes which may suggest possible retaliation by residents or staff and shall act promptly to remedy any such retaliation.
- (4) Monitoring past 90 days shall continue if the initial monitoring indicates an ongoing need and shall include:
 - (a) Periodic in-person conversations with residents and/or staff;
 - (b) Review of disciplinary incidents involving residents;
 - (c) Review of housing or program changes; and
 - (d) Review of negative performance reviews or reassignments of staff.

Sanctions for Individuals Found to have Participated in Sexual Abuse or Harassment

- (1) Disciplinary Sanctions for Staff [DOJ Standards §115.276]

(a) Staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.

(b) Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.

(c) Disciplinary sanctions for violations of Mirror policies relating to sexual abuse or sexual harassment shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.

(d) All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

(2) Corrective Action for Contractors and Volunteers [§115.277]

(a) Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with residents and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.

(b) Mirror shall take appropriate remedial measures and shall consider whether to prohibit further contact with residents, in the case of any other violation of sexual abuse or sexual harassment policies by a contractor or volunteer.

(3) Disciplinary Sanctions for Residents [DOJ Standards §115.278]

(a) Residents shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding the resident engaged in resident-on-resident sexual abuse or following a criminal finding of guilt for resident-on-resident sexual abuse.

(b) Sanctions shall be 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.

(c) The disciplinary process shall consider whether a resident's mental disability or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

(d) On a case-by-case basis, therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, may be required as a condition of access to programming or other benefits.

(e) The facility attempts to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners.

(f) Mirror may discipline a resident for sexual contact with staff only upon a finding the staff member did not consent to such contact.

(g) For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief the alleged conduct occurred shall not constitute falsely reporting an incident, even if an investigation does not establish evidence sufficient to substantiate the allegation.

(h) Mirror prohibits all sexual activity between residents and disciplines residents for such activity, the agency deems such activity to constitute sexual abuse only if it determines the activity is coerced.

Notifying Other Confinement Agencies [DOJ § 115.263]

- (1) Upon receiving an allegation a resident was sexually abused while confined at another facility, the Facility Director shall notify the head of the facility or agency where the alleged abuse occurred. Such notification shall be documented and provided as soon as possible, but no later than 72 hours after receiving the allegation.
- (2) When staff receives notification a resident was sexually abused or harassed while at a Mirror facility, a review shall be done to determine if an investigation has already occurred, or, Mirror will conduct an investigation.

TRAINING AND EDUCATION

Mirror is committed to communicating to the residents, to its employees, and to contractors and volunteers, the following information through the training, education and orientation. The PREA Resource Center will be utilized for training curricula.

A. Employee Training [DOJ §115.231]

- (1) Mirror shall train all employees who may have contact with residents on:
 - (a) Its zero-tolerance policy for sexual abuse, sexual harassment and retaliation;
 - (b) How to fulfill their responsibilities regarding prevention, detection, reporting, and response to sexual abuse and sexual harassment;
 - (c) Resident's right to be free from sexual abuse and sexual harassment;
 - (d) The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
 - (e) The dynamics of sexual abuse and sexual harassment in confinement;
 - (f) The common reactions of sexual abuse and sexual harassment victims;
 - (g) How to detect and respond to signs of threatened and actual sexual abuse;
 - (h) How to avoid inappropriate relationships with residents;
 - (i) How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents;
 - (j) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.
- (2) Security staff employees shall be trained in how to conduct searches of transgender and intersex residents, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. Cross-gender pat down searches are not permitted. In the case of an exigent circumstance, staff will conduct the search in full view of camera(s), as well as with another staff member present to witness the search. All cross-gender searches conducted due to an exigent circumstance will be documented and reported to the Facility Director and PCM immediately. A review of exigent circumstances will be reviewed at annual PREA training.
- (3) Training shall be tailored to the gender of the residents at the employee's facility. The employee shall receive additional training if the employee is reassigned from a facility

which houses only male residents to a facility which houses only female residents, or vice versa. Mirror staff will use the appropriate search methods detailed in training curriculum.

(4) All current employees shall receive this training, and the PREA Coordinator or designee, shall provide each employee with refresher training every year to ensure all employees know current sexual abuse and sexual harassment policies and procedures. Refresher information shall also be provided in annual trainings. Mirror will document all training through employee signature that the employee understands the training they received.

Resident Orientation and Education [DOJ §115.233]

(1) During the intake process, residents shall receive information explaining Mirror's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. The reporting can include to an outside third party or a crisis center.

(2) Within 24 hours of intake, Mirror staff shall provide and document comprehensive education to residents regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and Mirror's policies and procedures for responding to such incidents. Residents are informed in the training they are protected from all forms of retaliation after making a PREA report or allegation. This information shall be available in alternate formats for those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as, to residents who have limited reading skills. Documentation of these initial training sessions are captured by signature in the Resident Handbooks in the intake manual for each resident.

(3) Additionally, key information is continuously and readily available to residents in the participant intake book and posted on the PREA bulletin board in each facility.

Volunteer and Contractor Training [DOJ § 115.232]

(1) The Facility Director or Social Service Coordinator shall ensure all volunteers and contractors who have contact with residents have been trained on their responsibilities under Mirror's sexual abuse and sexual harassment prevention, detection, and response policies, and procedures.

- (a) The level and type of training provided to volunteers and contractors shall be based on the services they provide and the level of contact they have with residents, but all volunteers and contractors who have contact with residents shall be notified of our zero-tolerance policy regarding sexual abuse and sexual harassment and how to report such incidents. All contractors and volunteers shall confirm, with their signature, they have received and understand the training provided.
- (b) Volunteers will be required to receive the same training as a newly hired employee.

- (c) Contractors and vendors will receive the PREA informational brochure and confirm with their signature the zero-tolerance policy of Mirror, Inc.

Data Collection and Review [DOJ §§ 115.287- 289]

Data Collection [DOJ § 115.287]

Mirror PREA Coordinator:

- (1) Shall collect accurate, uniform data for every allegation of sexual abuse using a standardized instrument and set of definitions.
- (2) Shall aggregate the incident-based sexual abuse data at least annually.
- (3) The incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.
- (4) Shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.
- (5) Shall provide (upon request) all such data from the previous calendar year to the Department of Justice no later than June 30th.

Data Review for Corrective Action [DOJ § 115.288]

- (1) Data collected by Mirror, Inc shall be presented to the PREA Compliance Manager for review. The review will be used to assess and improve the effectiveness of the sexual abuse prevention, detection, and response policies, practices, and training, including by:
 - (a) Identifying problem areas;
 - (b) Taking corrective action on an ongoing basis; and
 - (c) Preparing an annual report of its findings and corrective actions for each facility, as well as, the agency as a whole.
- (2) Such report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of progress made in addressing sexual abuse.
- (3) The PREA Compliance Manager shall present the report for approval by the agency CEO and subsequently be published on the Mirror website. Specific material from the report may be redacted when publication would present a clear and specific threat to the safety and security of a facility. The nature of the material redacted shall be noted.

Data Storage, Publication, and Destruction [DOJ § 115.289]

Mirror PREA Coordinator shall be responsible for securely maintaining all data collected, and annually publishing all aggregated sexual abuse data. Personal identifiers shall be removed prior to publication. The agency ensures incident-based and aggregate data are securely

retained. All sexual abuse data collected shall be retained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.

Collective Bargaining Agreements [DOJ § 115.266]

Mirror is not involved with collective bargaining.

Auditing and Corrective Action [DOJ § 115.401-405]

A. Frequency and Scope of Audits [DOJ § 115.401]

- (1) During the three-year period starting on August 20, 2013, and during each three-year period thereafter, Mirror shall ensure each facility operated by the agency is audited at least once.
- (2) Mirror shall bear the burden of demonstrating compliance with the standards and permit the auditor to review all relevant agency-wide policies, procedures, reports, internal and external audits, and accreditations for each facility. We will provide copies of all relevant documents and allow auditors to conduct private interviews with inmates.
- (3) Additionally, Mirror shall make available to the auditor, at a minimum:
 - (a) A sampling of relevant documents and other records and information for the most recent one-year period;
 - (b) A sampling of any available videotapes and other electronically available data may be relevant to the provisions being audited.
 - (c) Access to all areas of the facility being audited.
 - (d) Cooperation of all Mirror staff and a sample of residents to be interviewed.
 - (e) At least one way for inmates to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.

Auditor Qualifications [DOJ § 115.402]

Mirror shall ensure audits are conducted by a qualified, certified auditor by the Department of Justice, which includes:

- (a) A member of a correctional monitoring body is not part of, or under the authority of, Mirror;
- (b) A member of an auditing entity such as an inspector general's or ombudsperson's office is external to the agency; or,
- (c) Other outside individuals with relevant experience.

No audit shall be conducted by an auditor who has received financial compensation from Mirror, except for compensation received for conducting prior PREA audits, within the three years prior to the agency's retention of the auditor. Furthermore, Mirror shall not employ, contract with, or otherwise financially compensate the auditor for three years subsequent to the retention of the auditor, with the exception of contracting for subsequent PREA audits.

Audit Contents and Findings [DOJ § 115.403]

- (1) Each audit shall include a certification by the auditor no conflict of interest exists with respect to his or her ability to conduct an audit of the agency under review.
- (2) Audit reports shall state whether agency-wide policies and procedures comply with relevant PREA standards.
- (3) For each PREA standard, the auditor shall determine whether the audited facility reaches one of the following findings:
 - (a) Exceeds Standard (substantially exceeds requirement of standard);
 - (b) Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period);
 - (c) Does Not Meet Standard (requires corrective action)
- (4) The audit summary shall indicate, among other things, the number of provisions the facility has achieved at each grade level.
- (5) Audit reports shall describe the methodology, sampling sizes, and basis for the auditor's conclusions with regard to each standard provision for each audited facility and shall include recommendations for any required corrective action.
- (6) Mirror shall ensure the auditor's final report is published on the corporate website.

Audit Corrective Action Plan [DOJ § 115.404]

- (1) A finding of "Does Not Meet Standard" with one or more standards shall trigger a 180-day corrective action period.
- (2) The auditor and Mirror shall jointly develop a corrective action plan to achieve compliance.
- (3) The auditor shall take necessary and appropriate steps to verify implementation of the corrective action plan, such as reviewing updated policies and procedures or re-inspecting portions of a facility.
- (4) After the 180-day corrective action period ends, the auditor shall issue a final determination as to whether the facility has achieved compliance with those standards requiring corrective action.
- (5) If Mirror does not achieve compliance with each standard, it may request a subsequent audit once the agency believes compliance has been achieved.

Audit Appeals [DOJ § 115.405]

- (1) Mirror may lodge an appeal with the Department of Justice regarding any specific audit finding it believes to be incorrect.
 - (a) Such appeal must be lodged within 90 days of the auditor's final determination.

(2) If the Department determines Mirror has stated good cause for a re-evaluation, a re-audit may be commissioned (at Mirror expense) with an auditor mutually agreed upon by the Department and the agency.

(3) The findings of the re-audit shall be considered final.

By signing below, I acknowledge I have received and understand the agency's PREA Policy, as well as the PREA training provided to me:

Staff Signature: _____ Date: _____