

POWER HOUR

Chat with a PREA Expert

115.11

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

March 31, 2022

IMPACT/JUSTICE

NATIONAL
PREA
RESOURCE
CENTER



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National PREA Resource Center Mission

The mission of the PRC is to assist adult prisons and jails, juvenile facilities, lockups, community confinement, and tribal facilities in their efforts to eliminate sexual abuse by increasing their capacity for prevention, detection, monitoring, responses to incidents, and services to victims and their families.

Logistics

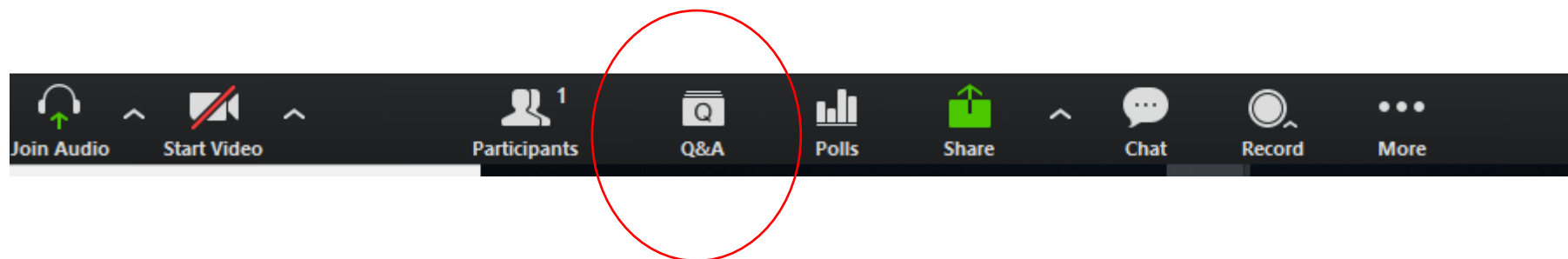
Technical support

- Please contact the ZoomPro webinar support line at (888) 799-9666 – select “2” when prompted to get support with technical difficulties.
- When asked please provide the **webinar ID (830-4642-6778)** so they know which event is associated with your technical issues.
- If you have trouble using this function, please contact **Ramses Prashad:** rprashad@impactjustice.org.

Logistics

Submitting questions

- To submit a question during the webinar, use the Q&A feature on your webinar toolbar, as seen below.
- Presenters will address the questions at the end of the presentation.



COVID-19 disclaimer

This webinar is designed to provide guidance related to compliance with **Standard 115.11** in general and will not specifically address concerns or answer questions related to COVID-19.

The PREA Resource Center (PRC) recognizes that coming into compliance or maintaining compliance with this Standard and others during the COVID-19 crisis presents specific challenges that you may not have faced before. If you have questions related to compliance during this crisis, please direct them to the PRC via “Contact Us,” and they will be shared with the PREA Management Office (PMO).

Or you may contact the PMO directly at PREACompliance@usdoj.gov.



POWER HOUR
Chat with a PREA Expert

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Standard requirements



§ 115.11, 115.111, 115.211, 115.311

- (a) An agency shall have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlining the agency's approach to preventing, detecting, and responding to such conduct.
- (b) An agency shall employ or designate an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities.

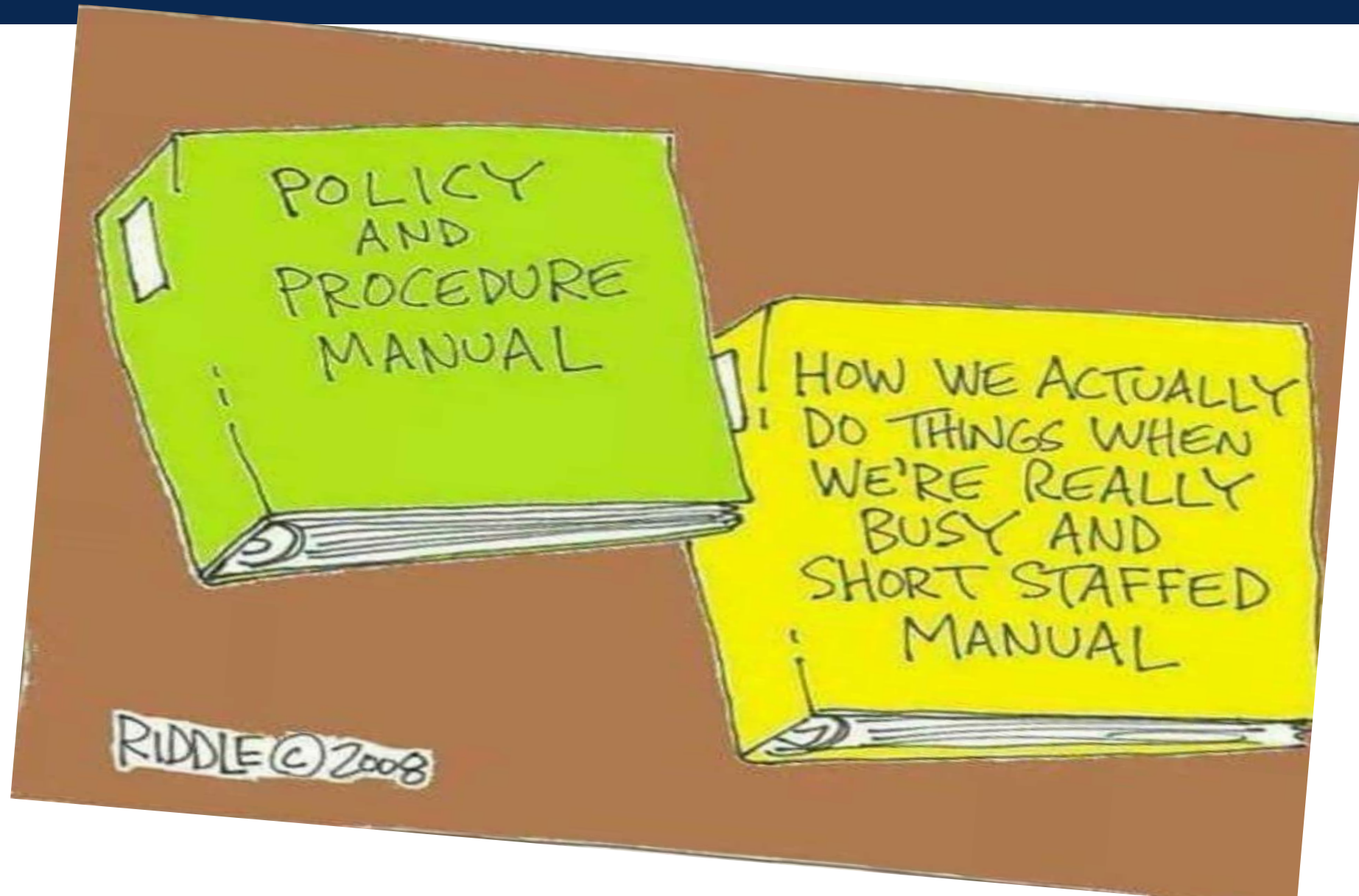
§ 115.11, 115.311

- (c) Where an agency operates more than one facility, each facility shall designate a PREA compliance manager with sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards.

Purpose of the Standard

- Ensure the sexual safety of facility inmates and staff through a comprehensive agency-wide approach to prevention, detection and response to sexual abuse and sexual harassment in all facilities operated by the agency.
- Ensure a zero-tolerance philosophy and culture permeates the entire organization from the highest levels of the organization; from management to the front-line staff in each facility.

Policy and procedure



Implementation

- Develop a robust zero tolerance policy that forms the foundation of an agency's comprehensive approach to prevent, detect, and respond to sexual abuse and sexual harassment of those in confinement. The development and implementation of the policy should be a collaborative process involving all pertinent agency/facility departments as well as applicable external stakeholders to obtain a collective understanding and buy-in from all parties.

National Institute of Corrections (NIC)
[Correctional Policy and Procedure](#)

Implementation

- Provide agency staff with a concise roadmap to implement specific and detailed procedures and practices that ensure the sexual safety of confined persons and staff in the facility.
- What, why, when, who, how
- Documents



Implementation (cont.)

- Designate an agency-wide PREA Coordinator who has the time, authority and resources to oversee the design and implementation of the agency's PREA program for all facilities under the agency umbrella.
- For agencies operating multiple facilities, designate a PREA Compliance Manager in each facility to work collaboratively with the PREA Coordinator who has the time, authority and resources to implement, oversee and sustain the agency's PREA compliance for a specific facility.

NOTE: For community confinement facilities and lockups, the subsection requiring a PREA Compliance Manager does not apply.

Implementation (cont.)

- Ensure that the PREA Coordinator has direct access to the head of the agency and regular communication with the agency's senior leadership, and likewise that the PREA Compliance Manager has similar access and communication with the head and senior leadership of the facility.

ability to affect meaningful and effective change

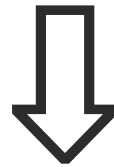
Sufficient time and authority

What constitutes “sufficient time and authority” for the purpose of meeting this requirement with regard to both PREA Coordinators and PREA Compliance Managers pursuant to standard 115.11?

- FAQ Dec 18, 2015: <https://www.prearesourcecenter.org/frequently-asked-questions/what-constitutes-sufficient-time-and-authority-purpose-meeting>

Full access to relevant information

- FAQ Dec 18, 2015 (cont.): <https://www.prearesourcecenter.org/frequently-asked-questions/what-constitutes-sufficient-time-and-authority-purpose-meeting>



Full access to relevant information related to the facility's compliance with the PREA Standards (e.g., PREA policies and procedures, data collected regarding sexual abuse and sexual harassment in the facility, investigative files, relevant portions of training and personnel files, etc.)

FAQ: March 25, 2015

Can the Standard 115.11/311 require that an agency with more than one facility designate a PREA Compliance Manager for each facility be met by the designation of regional PREA Compliance Managers who have responsibility for more than one facility, or must each facility designate its own individual PREA Compliance Manager who has no corresponding responsibilities at another facility?

- FAQ March 25, 2015

<https://www.prearesourcecenter.org/frequently-asked-questions/can-standard-11511-311-requirement-agency-more-one-facility-designate>

Challenges

- Creating a robust zero tolerance policy that provides sufficient detail, practical guidance, and procedural direction to ensure sexual safety in all areas of the facility.



Challenges

- Designating individuals as PREA Coordinator and PREA Compliance Managers who have sufficient time and authority to perform the roles envisioned by the standards when many of these individuals have other agency or facility responsibilities and may not be in positions that typically report directly to the head of their agency or facility.

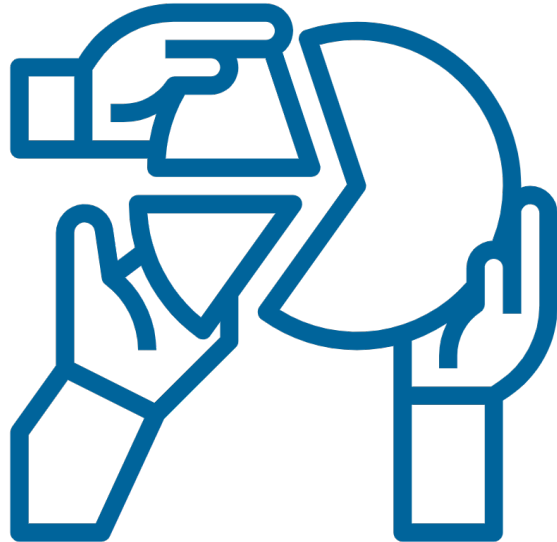
Challenges (cont.)

- Successfully creating a facility culture that values sexual safety, embraces zero tolerance, and fully implements the agency's PREA program with fidelity toward its purpose and goals.
- Maintaining momentum and commitment after initial implementation of the PREA program to ensure continued engagement from all levels of the organization regarding ongoing PREA sustainability.

Best practices

- PREA implementation and sustainability is most successful using a team approach bringing in all levels of the organization and key stakeholders in relevant ways to ensure a culture of sexual safety.
- The PREA Coordinator should have regular communication with the head of the agency and the support of agency leadership so that he or she can manage resistance to the institutionalization of both policy and practice.

Best practices (cont.)



- Collaboration with community services providers (e.g., local law enforcement, prosecutors, rape crisis organizations, SANE/SAFE medical personnel, etc.) in an ongoing manner is vital to a robust PREA program.

Best practices (cont.)

- Create a process to gather and use comprehensive data on the agency's PREA implementation for future decision making related to progress and change management.



Audit issues

- Assessing whether the agency's PREA policies, procedures and practices are detailed, comprehensive and effective in creating a culture of sexual safety in the facility.
- Assessing whether the PREA Coordinator and the PREA Compliance Manager have sufficient time and authority to successfully perform their role and functions.

Resources

- Frequently Asked Questions (FAQs) on the PREA Resource Center (PRC) website:
<https://www.prearesourcecenter.org/frequently-asked-questions>
- The Department of Justice has issued extensive guidance regarding policies to ensure referrals of allegations for investigations. Visit the PRC FAQ page and search for guidance under the Standard 115.11 for the many related FAQ responses provided by DOJ. The FAQs to date are as follows:
- December 18, 2015 - What constitutes “sufficient time and authority” for the purpose of meeting this requirement with regard to both PREA Coordinators and PREA Compliance Managers pursuant to standard 115.11?
<https://www.prearesourcecenter.org/frequently-asked-questions/what-constitutes-sufficient-time-and-authority-purpose-meeting>
- March 25, 2015 - Can the standard 115.11/311 requirement that an agency with more than one facility designate a PREA Compliance Manager for each facility be met by the designation of regional PREA Compliance Managers who have responsibility for more than one facility, or must each facility designate its own individual PREA Compliance Manager who has no corresponding responsibilities at another facility?
<https://www.prearesourcecenter.org/frequently-asked-questions/can-standard-11511-311-requirement-agency-more-one-facility-designate>

Resources

Archived Webinars on the PRC Website:

- November 16, 2017- Taking Your First Steps: Guidance for Jail PREA Coordinators and Compliance Managers
https://vimeo.com/243740917?embedded=true&source=video_title&owner=56725924
- March 19, 2015 – Specific Challenges for the Jail PREA Coordinator
https://vimeo.com/182927244?embedded=true&source=video_title&owner=56725924
- January 27, 2015 – The Making of a Jail PREA Coordinator
https://vimeo.com/182927224?embedded=true&source=video_title&owner=56725924
- PREA Compliance Manager Orientation Guide
<https://www.prearesourcecenter.org/resource/prea-compliance-manager-orientation-guide>

Questions & Answers



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FEATURED RESOURCE

WEBINAR

Power Hour: Chat with a PREA Expert on Standard 115.32

STANDARDS:
115.32

FACILITY:	TERMS:
Community Confinement	Volunteers
Juvenile Facility (+2)	Contractors (+2)

WEBINAR

PRC Website Revision: Overview and Q&A

STANDARDS:
None

FEATURED RESOURCE

WEBINAR

Developing a PREA-Compliant Language Access Plan for Incarcerated...

STANDARDS:
115.16, 115.21, 115.51, 115.53

FACILITY:	TERMS:
Community Confinement	Accessibility
Juvenile Facility	Limited English proficient

TOOL: AUDIT

Audit Report Template - Juvenile Facilities

STANDARDS:
115.401

FACILITY:	TERMS:
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	Audit Instrument (+2)

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Request for assistance

Please fill out the form below in order to request PREA-related training and/or technical assistance for your jurisdiction or agency. The more detail provided in your request will improve the PREA Resource Center's (PRC) ability to meet your needs. For jurisdictions less familiar with PREA, the PRC would encourage you to browse the resources on the [Where to begin page](#). If your jurisdiction has general questions or comments for the PRC you can communicate those through the [Contact us form](#).

To submit information on complaints or concerns about the conduct of a DOJ-certified PREA auditor, please refer to the [Auditor feedback form](#).

The PRC collects the information below in order to efficiently route and respond to inquiries. While all fields are not required, please fill out as much information as possible so that we may better assist you.

Request assistance

Jurisdictions can request assistance by completing a web form on the PRC website under the “Implementation” tab and clicking “Request for assistance” under “Training.”

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For more information about the National PREA Resource Center, visit www.prearesourcecenter.org.

To ask a question, please visit our [Contact us](#) page.

Thank you!



Good luck!

Notice of federal funding and federal disclaimer

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