

## **TILLAMOOK YOUTH CORRECTIONAL FACILITY**

### **PREA AUDIT FINDINGS**

#### **NARRATIVE:**

The on-site PREA audit of the Tillamook Youth Correctional Facility (TYCF) in Tillamook, Oregon occurred August 25-27, 2014, during the same week as the PREA audit of the Camp Tillamook, another Oregon Youth Authority (OYA) facility that is immediately adjacent to TYCF and with which TYCF shares some facilities, programs and staff. The audit began in the morning of August 25 and concluded in the evening of August 27, with a total of three days on-site. The audit began with an entrance meeting that included the OYA PREA Coordinator; the Tillamook YCF, Trask Unit Coordinator; and the Tillamook YCF, Orca Unit Treatment Manager; and, PREA Auditor, Anne M. Nelsen. The entrance meeting included an introduction and overview of the schedule for the three-day audit period. The agency and the auditor had the opportunity to respond to any questions that they had and the agency was helpful in offering any assistance that may be needed during the two PREA audits scheduled for that week. Following the entrance meeting a comprehensive tour of the facility was provided. That tour included the main TYCF building, the education building, the food services building, the vocational educational building, the greenhouse and the grounds. After completing the tour, auditor interviews with staff members and with residents began and continued throughout the subsequent three days.

Prior to the audit, the auditor requested a list of specialized staff members and contractors to be interviewed. The PREA Coordinator provided the auditor with that list, including contact information and she helped to schedule and facilitate video interviews with key agency personnel located in the OYA central office in Salem, Oregon and phone interviews with individuals from outside agencies. One interview occurred subsequent to the site visit. That interview was with OYA human resources staff. All other interviews were conducted during the site visit. Some interviews for the Camp Tillamook audit were conducted conjointly with interviews for the Tillamook YCF audit.

Specific individuals interviewed as part of the audit process the Tillamook YCF Trask Unit Coordinator; the Tillamook YCF QMHP; the OYA Director; the OYA Director of Treatment Services; the Tillamook YCF Orca Unit, Treatment Manager/PREA Compliance Manager; the OYA Research Director; an OYA Research Associate; the OYA Professional Standards Office secretary; the OYA Training Academy Director; the OYA Training Unit Associate; the OYA Professional Standards Office Administrator/ Chief Investigator; the assigned Detective, Oregon State Police; the OYA Assistant Director, Community Services; the OYA Accounting Manager; the OYA Assistant Director, Health Services; the Hillcrest Youth Correctional Facility, Intake Manager; the OYA HR Director; the OYA Assistant HR Administrator; the OYA Senior HR Analyst; an OYA HR Staff Member; the Tillamook YCF Nurse; the OYA PREA Coordinator; the Tillamook YCF Food Services Manager/Volunteer Coordinator; the Tillamook YCF/Camp Tillamook Lead Teacher/Education Site Manager; the Tillamook YCF/Camp Tillamook Secretary/Training Records Manager; the Director, Rape Crisis Center; the Victim Advocate, Rape Crisis Center; the local hospital, SANE nurse; and the Tillamook YCF Superintendent.

In addition, eight line staff members were interviewed during the audit. Those interviewees were selected randomly from schedules of staff members on duty on the days of the audit, on both day and evening shifts. It should be noted that the size of the Tillamook YCF means that line staff duties are often shared by administrators and other staff members who were interviewed during the audit.

Finally, interviews were conducted of residents who represented specific PREA categories as well as from all living units or groups at the facility. There were reportedly no residents who reported sexual victimization during risk screening at admission, no youth who identified as gay, lesbian, bisexual, transgender or intersex, and no youth with limited English proficiency or literacy skills at the time of the audit. There was one resident who alleged to have been sexually abused while at the facility and he was interviewed. There were 49 residents listed on the daily population reports during the audit. Interviews were conducted with 10 residents. Residents

interviewed included residents housed in each of the two units and, other than the resident who alleged to have been the victim of sexual abuse, they were randomly selected.

I was at the facility during both daytime activities and early evening hours in order to interview staff and to observe activities.

An Exit Meeting was held the final day of the audit with the following individuals present: the OYA Assistant Director, Facility Services; the OYA Accounting Manager; the OYA Rules and Policy Coordinator; the OYA Training Academy Director; the OYA Facility Services, Chief of Operations; the OYA Director; the OYA HR Director; the Facility Services Administrator; the OYA Professional Standards Office Secretary; and the Tillamook YCF Superintendent. During that meeting I complimented those present for choosing to be one of the agency's facilities to complete their PREA during the first year of the three-year cycle. I recognized the enormous amount of work that was required, especially since they do not have peer facilities to refer to who have completed the process in prior years. I also applauded the preparation by the PREA Coordinator and others in the OYA central office, particularly the Office of Professional Standards, as well as the Superintendent, and other key staff members, both prior to and during the audit. Their work and effort made the process more straightforward and less problematic and helped to ensure that the audit went smoothly and that no time was wasted. I noted the apparent high quality and commitment of the facility staff. Many employees have been at the facility for many years and bring an abundance of experience and expertise that cannot be easily replaced. And, I pointed out that the residents interviewed consistently expressed a sense of wellbeing and safety. I offered a very preliminary and cursory review of my initial findings but I emphasized that I could not offer specific information about what my report would state and that I would be compiling that report over the coming 30 days, reviewing the Pre-Audit Questionnaire, the supporting documents, my observations from my tour and information derived from interviews. During the audit, I requested additional documentation to use in determining whether specific standards were met, particularly related to the intake process. Intake for all OYA facilities occurs at one facility, where placement decisions are made. That facility, Hillcrest Youth Correctional Facility, completes initial screening related to PREA so I requested documentation of the intake, assessment and screening that is completed there, in accordance with PREA requirements. Unfortunately, that documentation was not forthcoming during the 30 days allotted to write the Initial Report so several standards were found out of compliance at that time due to the lack of documentation.

#### **DESCRIPTION OF FACILITY CHARACTERISTICS:**

The Tillamook Youth Correctional Facility is a secure, correctional facility located in a rural area near the community of Tillamook, Oregon, operated by the Oregon Youth Authority. It is immediately adjacent to Camp Tillamook, another OYA facility that was audited during the same week. The two facilities share some buildings, facilities, staff and contractors and have the same Superintendent. TYCF is a 50-bed facility that serves males up to the age of 25 who have been adjudicated for a sex offense. The facility is bordered on one side by a tree farm where residents are able to participate in work projects. It is located near a national forest and a former military camp and large private farms. The facility is has been very well maintained, is in excellent condition and was very clean. The facility has two separate, 25-bed units and residents are generally assigned to one or the other based on age and maturity. The number of residents reported during the 12 months prior to the audit ranged from 43 to 52, as counted on the first, tenth and twentieth day of each month. In addition to the two dormitory style, sleeping units, each with a large bath and shower room, the main building has a gymnasium, medical office and exam rooms, therapist offices, one isolation room, and administrative offices. All assigned sleeping areas are in the open dorm areas; there are no individual sleeping rooms. The education building was built within the past few years and has several classrooms and offices. The food services building is where all meals are prepared for both TYCF and Camp Tillamook, next door. There is a vocational training building, a greenhouse and garden, and storage sheds located on the grounds.

The facility population ranged in age from 15 to 22 years during the preceding 12 months but the agency may take residents up to age 25 years. The average length of stay was 449 days. There were 36 staff members employed at the facility in the past twelve months and, because of the size and nature of the facility, all staff

members may have direct contact with residents. There is a full-time nurse who provides most medical care for both TYCF and Camp Tillamook and who coordinates with the contracted part-time medical doctor and psychiatrist. Those medical positions are shared with Camp Tillamook as well. The schoolteachers are employed by the Tillamook School District. The agency uses volunteers for a variety of services to enhance the programs provided to the residents. There are currently 34 volunteers and six contractors for the two facilities.

## **SUMMARY OF AUDIT FINDINGS:**

### **Initial Report:**

This auditor completed a site visit of the Tillamook Youth Correctional Facility on August 25-27, 2014. Based on review of the Pre-Audit Questionnaire and accompanying documents, documents reviewed and interviews conducted during and shortly after the site visit, and my subsequent review of documents, along with conversations and email communication with key agency and facility staff, the following results are determined in this **Initial Report:**

Standards met (no corrective action needed): 120

Standard not met (requiring corrective action): 46

Not exempt from standard: 1

Not applicable standards: 19

The facility met 72% of the 167 applicable standards at the time of the initial report. It should be noted that in almost all cases, recommended corrective action was fairly limited and generally required promulgating or revising written policies and procedures, providing necessary documentation or developing practices to ensure compliance could be verified. Because the facility has only one example of an allegation of sexual abuse or sexual harassment, including accompanying investigation that is still pending, it is particularly important to provide verification of compliance by providing written policy of what is expected in such cases, verification of staff training and other documentation.

### **Final Report:**

The agency developed Corrective Action Plans for each of the standards that had been found out of compliance in the Initial Report, working collaboratively with this auditor in doing so. The agency completed corrective action plans for each of the 46 standards that were not met at the time of the audit and was subsequently found to meet them all. **The Tillamook Youth Correctional Facility now meets 100% of applicable and non-exempt PREA Juvenile Facilities standards.** The agency compliance is as follows:

Standards met: 166

Standard not met: 0

Not exempt from standard: 1

Not applicable standards: 19

The agency and facility worked diligently and professionally to address this auditor's concerns and to develop and achieve Corrective Action Plans (CAP). The corrective action effort required was increased by the fact that the OYA PREA Coordinator left the agency shortly after the Initial Audit Findings Report was submitted. The corrective action work was subsequently managed efficiently and professionally by the OYA Rules and Policy Coordinator. A new PREA Coordinator was hired during the corrective action period and she also assisted in completing corrective action work, along with other OYA central office staff. And, the facility Superintendent was involved in the CAP and provided help and support in addressing this auditor's requests for information, in providing necessary staff training and in implementing practices consistent with PREA standards.

During the audit, it was clear, through interviews, that facility staff members lacked thorough understanding of key PREA standards and the relevant requirements of those standards. Although all interviewees reported having had training on PREA, there were significant areas where they lacked familiarity with standards' expectations. This auditor reviewed training records on the agency training database and discovered a number of discrepancies. It appeared to this auditor that the PREA training received by staff at Tillamook YCF had been inadequate to prepare them for the audit and, more concerning, to prepare them to respond appropriately to an allegation of sexual harassment or sexual abuse. During the corrective action period, the new PREA Coordinator and the Superintendent provided a great deal of training to the staff regarding all aspects of the PREA standards, with particular focus on those standards that were not met at the time of the audit.

In addition to staff training, the agency and the facility revised some intake practices to ensure compliance with PREA standards that address risk assessment. Because OYA completes initial intake for male residents at one facility at the time of commitment, they had not been conducting all required risk assessments during intake at Tillamook YCF, as required by the PREA Standards. The current practice now meets all relevant intake standards and ensures an additional level of assessment in the process.

This auditor conducted follow-up interviews, via Skype, with a number of randomly selected line staff members, with clinical staff members, with the facility PREA Compliance Manager and with a number of randomly selected residents to address concerns, concentrating on those standards that had not been met at the time of the audit and where staff had demonstrated a lack of knowledge or understanding. Those interviews successfully verified that the facility and the agency have worked diligently since the audit to improve the staff's level of comprehension of the PREA standards and of their awareness of what actions would be required of them in preventing and responding to allegations of sexual harassment or sexual abuse. In addition, this auditor conducted follow-up interviews with the Superintendent and the PREA Coordinator by phone to further confirm the efforts that had occurred to meet all applicable PREA standards. This auditor completed an Auditor Compliance Tool, detailing all information considered in both the Initial Findings Report and this Final Report, including documentation reviewed, interviews conducted and on-site observations. That Tool includes information from the Pre-Audit period, the Audit, and the CAP. That Tool was completed and provided to the agency on this date.

This auditor found the agency and the facility employees to be extremely dedicated to providing quality services to the youth in their custody. They expressed high levels of commitment on every level. The agency completed its CAP diligently and thoroughly. The agency reported plans to continue to enhance PREA training for all OYA staff going forward. It is hoped that the experience of this audit will assist the agency in that effort. Tillamook YCF employees consistently conveyed commitment to ensuring the safety of each young person and to helping the residents in their care, as they work with them to improve their lives and become productive citizens. Residents at Tillamook YCF verbalized feeling safe at the facility and generally verified that the staff members are concerned for their well-being. It is expected that this successful PREA audit at Tillamook YCF will help the facility to serve as a model facility within the OYA continuum.

**AUDITOR CERTIFICATION:**

The auditor certifies that the contents of the report are accurate to the best of his/her knowledge and no conflict of interest exists with respect to his or her ability to conduct an audit of the agency under review.

*Anne M. Nelsen, MSW, MPA*

March 30, 2015

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Auditor Signature

Date