PREA Facility Audit Report: Final

Name of Facility: Ocean Tides School
Facility Type: Juvenile
Date Interim Report Submitted: NA
Date Final Report Submitted: 07/31/2026

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	☑
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	☑
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	☑
Auditor Full Name as Signed: Elaine Bridschge	**Date of Signature:** 07/31/2026

AUDITOR INFORMATION	
Auditor name:	Bridschge, Elaine
Email:	risingsunauditing@gmail.com
Start Date of On-Site Audit:	07/14/2026
End Date of On-Site Audit:	07/15/2026

FACILITY INFORMATION	
Facility name:	Ocean Tides School
Facility physical address:	635 Ocean Road, Narragansett, Rhode Island - 02882
Facility mailing address:	635 Ocean Rd, Narragansett, Rhode Island - 02882

Primary Contact

Name:	Kailiana Dunlap
Email Address:	kdunlap@oceantides.org
Telephone Number:	4018621035

Superintendent/Director/Administrator	
Name:	Brian F.X. Sullivan
Email Address:	bsullivan@oceantides.org
Telephone Number:	4017891016

Facility PREA Compliance Manager	
Name:	Susan Vogl
Email Address:	svogl@oceantides.org
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Facility Health Service Administrator On-Site	
Name:	Allyson Manning R.N.
Email Address:	amanning@oceantides.org
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Facility Characteristics	
Designed facility capacity:	35
Current population of facility:	24
Average daily population for the past 12 months:	21
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Men/boys

Age range of population:	13-18
Facility security levels/resident custody levels:	Residential Treatment
Number of staff currently employed at the facility who may have contact with residents:	63
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	1
Number of volunteers who have contact with residents, currently authorized to enter the facility:	1

AGENCY INFORMATION	
Name of agency:	Ocean Tides, Inc.
Governing authority or parent agency (if applicable):	
Physical Address:	635 Ocean Road, Narragansett, Rhode Island - 02882
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:	
Name:	
Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information			
Name:	Kaliana Dunlap	**Email Address:**	kdunlap@oceantides.org

Facility AUDIT FINDINGS

Summary of Audit Findings

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:	
3	• 115.313 - Supervision and monitoring • 115.331 - Employee training • 115.333 - Resident education
Number of standards met:	
40	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

Please note: Question numbers may not appear sequentially as some questions are omitted from the report and used solely for internal reporting purposes.

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2026-07-14
2. End date of the onsite portion of the audit:	2026-07-15

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	(●) Yes ( ) No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Day One, the community victim-advocacy and emotional-support provider, was contacted through a completed provider questionnaire dated July 17, 2026. The current July 2026 MOU and contact materials were also reviewed.

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	34
15. Average daily population for the past 12 months:	20
16. Number of inmate/resident/detainee housing units:	1

17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	○ Yes ○ No ◉ Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit

Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit

23. Enter the total number of inmates/ residents/detainees in the facility as of the first day of onsite portion of the audit:	22
25. Enter the total number of inmates/ residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
26. Enter the total number of inmates/ residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	2
27. Enter the total number of inmates/ residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
28. Enter the total number of inmates/ residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0

29. Enter the total number of inmates/ residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	4
30. Enter the total number of inmates/ residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	0
31. Enter the total number of inmates/ residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
32. Enter the total number of inmates/ residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	0
33. Enter the total number of inmates/ residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	0
34. Enter the total number of inmates/ residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	The facility housed an all-male youth population in one dormitory arrangement. Each youth had a private bedroom. No youth was in isolation or segregated housing for sexual-victimization risk.

Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	60
37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	1
38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	1
39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	The first-day roster identified 60 current staff across administration, education, social services, and residential shifts; one volunteer; and one contractor with youth contact.

INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	6

41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	☑ Age ☐ Race ☐ Ethnicity (e.g., Hispanic, Non-Hispanic) ☑ Length of time in the facility ☑ Housing assignment ☐ Gender ☑ Other ☐ None
If "Other," describe:	Selection considered age, admission date, time in placement, room/program location, and representation across the current youth roster. The facility housed an all-male population.
42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	The facility had one housing area. Geographic diversity across multiple units was not possible. Random youth were selected across the resident roster, private bedrooms, program areas, and daily movement to avoid concentration in one location.
43. Were you able to conduct the minimum number of random inmate/ resident/detainee interviews?	◉ Yes ○ No
44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	Six random youth interviews were completed privately. One additional randomly selected youth declined to participate. No concern was identified through the completed interviews.

Targeted Inmate/Resident/Detainee Interviews	
45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	4
As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".	
47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	First-day data, current roster information, screening records, leadership confirmation, and onsite observation were compared.

48. Enter the total number of interviews conducted with inmates/residents/ detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	1
49. Enter the total number of interviews conducted with inmates/residents/ detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	First-day data, screening records, leadership confirmation, and onsite observation identified no youth who were blind or had low vision.
50. Enter the total number of interviews conducted with inmates/residents/ detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.

b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	First-day data, screening records, leadership confirmation, and onsite observation were compared.
51. Enter the total number of interviews conducted with inmates/residents/ detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	3
52. Enter the total number of interviews conducted with inmates/residents/ detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	First-day data, screening records, leadership confirmation, and youth interviews identified no youth in this category.
53. Enter the total number of interviews conducted with inmates/residents/ detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	First-day data, screening records, leadership confirmation, and youth interviews were compared.
54. Enter the total number of interviews conducted with inmates/residents/ detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	Data Collection Part Two, current youth information, screening records, and interviews were compared.
55. Enter the total number of interviews conducted with inmates/residents/ detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	Data Collection Part Two, current youth information, screening records, and interviews were compared.
56. Enter the total number of interviews conducted with inmates/residents/ detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	First-day data, housing records, leadership confirmation, interviews, and onsite observation were compared.

57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	Four targeted youth interviews were completed: one youth identified for cognitive/ functional-disability protocol and three youth identified for limited-English-proficiency protocol. One additional targeted youth declined to participate. No interpreter was needed for the completed interviews.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
58. Enter the total number of RANDOM STAFF who were interviewed:	12
59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	☑ Length of tenure in the facility ☑ Shift assignment ☑ Work assignment ☑ Rank (or equivalent) ☑ Other (e.g., gender, race, ethnicity, languages spoken) ☐ None
If "Other," describe:	Selection included residential, education, social-services, administrative, day, evening, overnight, male, and female staff. Staff with different levels of responsibility and direct youth contact were included.
60. Were you able to conduct the minimum number of RANDOM STAFF interviews?	◉ Yes ○ No
61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	Twelve random staff interviews were completed: seven male and five female staff across day, evening, and overnight assignments. No PREA implementation concern was identified.

Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	17
63. Were you able to interview the Agency Head?	(●) Yes ( ) No
64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	(●) Yes ( ) No
65. Were you able to interview the PREA Coordinator?	(●) Yes ( ) No
66. Were you able to interview the PREA Compliance Manager?	(●) Yes ( ) No ( ) NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

67. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)	☐ Agency contract administrator ☒ Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment ☒ Line staff who supervise youthful inmates (if applicable) ☐ Education and program staff who work with youthful inmates (if applicable) ☒ Medical staff ☒ Mental health staff ☐ Non-medical staff involved in cross-gender strip or visual searches ☒ Administrative (human resources) staff ☐ Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff ☐ Investigative staff responsible for conducting administrative investigations ☐ Investigative staff responsible for conducting criminal investigations ☒ Staff who perform screening for risk of victimization and abusiveness ☐ Staff who supervise inmates in segregated housing/residents in isolation ☒ Staff on the sexual abuse incident review team ☒ Designated staff member charged with monitoring retaliation ☒ First responders, both security and non-security staff ☒ Intake staff

	☐ Other
68. Did you interview VOLUNTEERS who may have contact with inmates/ residents/detainees in this facility?	◉ Yes ○ No
a. Enter the total number of VOLUNTEERS who were interviewed:	1
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	☑ Education/programming ☐ Medical/dental ☐ Mental health/counseling ☐ Religious ☐ Other
69. Did you interview CONTRACTORS who may have contact with inmates/ residents/detainees in this facility?	◉ Yes ○ No
a. Enter the total number of CONTRACTORS who were interviewed:	1
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	☐ Security/detention ☐ Education/programming ☐ Medical/dental ☐ Food service ☐ Maintenance/construction ☑ Other

70. Provide any additional comments regarding selecting or interviewing specialized staff.	17 non-duplicated specialized staff interview questionnaires were completed and received, as confirmed by the completed Ocean Tides RSAS-106 Exit Meeting Agenda. Volunteer and contractor questionnaires are counted separately in Questions 66 and 67.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.

71. Did you have access to all areas of the facility?	(●) Yes ( ) No
Was the site review an active, inquiring process that included the following:	
72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	(●) Yes ( ) No
73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	(●) Yes ( ) No
74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	(●) Yes ( ) No

75. Informal conversations with staff during the site review (encouraged, not required)?	(●) Yes ( ) No
76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	The facility consisted of one housing area with private bedrooms and no isolation unit. Direct supervision, approximately 15-minute checks, supervisory camera access, English/Spanish notices, reporting options, and outside-support information were verified.

Documentation Sampling

Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.

77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	(●) Yes ( ) No
78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	Auditor-selected samples included background checks, training records, youth education acknowledgments, risk screenings, staffing records, unannounced rounds, annual reports, and investigation/data records.

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.

79. Total number of SEXUAL ABUSE allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	0	0	0

80. Total number of SEXUAL HARASSMENT allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	1	0	1	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	1	0	1	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

Note: these counts should reflect where the investigation is currently (i.e., if a criminal investigation was referred for prosecution and resulted in a conviction, that investigation outcome should only appear in the count for “convicted.”) Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual abuse investigation files, as applicable to the facility type being audited.

81. Criminal SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual abuse	0	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0	0
Total	0	0	0	0	0

82. Administrative SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	0	0	0

Sexual Harassment Investigation Outcomes

Note: these counts should reflect where the investigation is currently. Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual harassment investigation files, as applicable to the facility type being audited.

83. Criminal SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual harassment	0	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0	0
Total	0	0	0	0	0

84. Administrative SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	1	0	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	1	0	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

85. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	0
a. Explain why you were unable to review any sexual abuse investigation files:	No sexual-abuse investigation file existed during the review period.

86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	○ Yes ○ No ◉ NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	○ Yes ○ No ◉ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	○ Yes ○ No ◉ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	○ Yes ○ No ◉ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	○ Yes ○ No ◉ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	1
94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	○ Yes ○ No ◉ NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	1
96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	○ Yes ◉ No ○ NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	◉ Yes ○ No ○ NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

Staff-on-inmate sexual harassment investigation files	
98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	○ Yes ○ No ◉ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	○ Yes ○ No ◉ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	Data Collection Part Two is the controlling source. It reports zero sexual-abuse allegations and one youth-on-youth sexual-harassment allegation. The harassment allegation was administratively investigated and determined unfounded. The completed Ocean Tides RSAS-106 Exit Meeting Agenda confirms that the Auditor reviewed the matter onsite and identified no issues or concerns. The PAQ Close-Out Form incorrectly listed the matter under sexual abuse; that classification was not carried into this worksheet or the report.

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

102. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	○ Yes ◉ No

Non-certified Support Staff

103. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	○ Yes ◉ No

AUDITING ARRANGEMENTS AND COMPENSATION

108. Who paid you to conduct this audit?	○ The audited facility or its parent agency ○ My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option) ◉ A third-party auditing entity (e.g., accreditation body, consulting firm) ○ Other
Identify the name of the third-party auditing entity	Corrections Consulting Services, LLC

Standards
Auditor Overall Determination Definitions
• Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions)
Auditor Discussion Instructions
Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.311	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.311 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator Evidence Reviewed - Sexual Assault Coordinated Response Plan, Revised November 3, 2018. - Ocean Tides Organizational Chart. - Ocean Tides Staff Roster. - Ocean Tides Child Safety Website and publicly available PREA Reports. - Annual Staffing Plan Assessments (2021, 2022, 2023, 2024, and 2025). - Completed PREA Coordinator, PREA Compliance Manager, facility leadership, and agency-head questionnaires.

- Entrance-meeting verification and updated organizational chart.

- Ocean Tides ACT/PAQ responses for Standard 115.311.

- Agency and facility organizational charts

- Completed PREA Coordinator, PREA Compliance Manager, Agency Head, and Superintendent questionnaires

Provision Analysis

115.311(a)

Policy Review and Analysis

This provision establishes the following requirement: 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. Ocean Tides' written framework for this provision includes Sexual Assault Coordinated Response Plan, Revised November 3, 2018., Annual Staffing Plan Assessments (2021, 2022, 2023, 2024, and 2025).. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. Under Section I. Overview [115.311(A)-1], the policy states: "Ocean Tides has a zero-tolerance policy concerning sexual abuse, sexual assault, sexual harassment and voyeurism of youth and is committed to the prevention and elimination of sexual abuse/assault within its programs through compliance with the Prison Rape Elimination Act (PREA)." The policy further states: "Ocean Tides is committed to the equal opportunity to participate in and benefit from all aspects of the agency's efforts to prevent, detect and respond to sexual abuse, assault and harassment." The policy additionally provides: "Violations of this policy may result in disciplinary sanctions for staff and youth perpetrators and/or criminal prosecution as authorities deem appropriate."

ACT/PAQ Review

ACT responses indicate that Ocean Tides has established a PREA program overseen by designated PREA leadership positions and maintains a comprehensive approach to PREA compliance. The ACT identifies both a PREA Coordinator and PREA Compliance Manager and confirms that sufficient authority and resources have been assigned to oversee PREA implementation. The ACT data corroborates the written policy requirements by demonstrating that Ocean Tides has established organizational structures necessary to implement the policy's prevention, detection, reporting, response, and monitoring requirements.

Documentation Review

The Auditor reviewed the PREA Compliance Policy, Organizational Chart, Staff Roster, Annual Staffing Plan Assessments, and Ocean Tides Child Safety webpage. The PREA Compliance Policy establishes a comprehensive zero-tolerance framework

	prohibiting sexual abuse, sexual assault, sexual harassment, and voyeurism. The policy incorporates prevention, detection, reporting, investigation, response, retaliation monitoring, disciplinary sanctions, resident education, staff training, and incident review requirements throughout the document. Specifically, the policy establishes prohibited conduct, staffing and monitoring requirements, resident screening procedures, employee training requirements, reporting mechanisms, first responder responsibilities, retaliation monitoring procedures, incident review requirements, and disciplinary sanctions. The Organizational Chart and Staff Roster demonstrate that Ocean Tides maintains an administrative structure capable of implementing PREA requirements throughout the organization. Annual Staffing Plan Assessments demonstrate ongoing evaluation of staffing resources, supervision practices, and monitoring technology to support resident safety and PREA compliance efforts. The Auditor also reviewed the Ocean Tides Child Safety webpage, which contains publicly available PREA reports and prior audit reports. Public posting of PREA reports demonstrates ongoing agency commitment to PREA compliance, transparency, and accountability. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.311(a). 115.311(b) Policy Review and Analysis This provision establishes the following requirement: 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. Ocean Tides' written framework for this provision includes Sexual Assault Coordinated Response Plan, Revised November 3, 2018., Annual Staffing Plan Assessments (2021, 2022, 2023, 2024, and 2025).. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. Under Section VIII. Allegations of Inappropriate Conduct, the policy states: "Ocean Tides has also designated the Director of Administration to be the point person for reports." ACT/PAQ Review ACT responses identify the Director of Administration as the Agency PREA Coordinator. The ACT further indicates that the position has sufficient time and authority to develop, implement, and oversee agency efforts to comply with PREA standards. The ACT data directly corroborates both the policy designation and the responsibilities identified within the Coordinated Response Plan. Documentation Review The Auditor reviewed the PREA Compliance Policy, Organizational Chart, Staff Roster, and Sexual Assault Coordinated Response Plan. The Coordinated Response

	Plan identifies the Director of Administration/PREA Coordinator and assigns responsibility for ensuring completion of coordinated response documentation, tracking required investigative documents, responding to requests from the State PREA Coordinator, reviewing PREA documentation for completeness, and forwarding documentation to the Statewide PREA Coordinator. The Organizational Chart reflects that the Director of Administration occupies an upper-level management position within the agency structure. The Staff Roster further confirms assignment of administrative responsibilities associated with PREA oversight. The policy and supporting documentation demonstrate that Ocean Tides has designated an upper-level management official to oversee agency PREA compliance efforts. The Director of Administration is assigned responsibility for PREA oversight, incident coordination, documentation review, and communication with statewide PREA authorities. Documentation reviewed demonstrates that PREA oversight responsibilities have been formally incorporated into agency operations. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.311(b). 115.311(c) Policy Review and Analysis This provision establishes the following requirement: 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. Ocean Tides' written framework for this provision includes Sexual Assault Coordinated Response Plan, Revised November 3, 2018., Annual Staffing Plan Assessments (2021, 2022, 2023, 2024, and 2025).. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy assigns responsibilities to the PREA Coordinator under Section XII. Retaliation and states: "All individuals involved in a PREA incident including the victim, witnesses, staff members, or third-party reporters will be monitored for retaliation by the PREA Coordinator by personal interview every thirty days for at a minimum of 90 days and this monitoring will continue if concerns for retaliation remain." The policy further states: "All documentation will be maintained in a file by the PREA Coordinator." The Sexual Assault Coordinated Response Plan further identifies the Director of Administration/PREA Coordinator as responsible for PREA coordination activities and incident documentation oversight. ACT/PAQ Review ACT responses identify the Director of Administration as the facility's PREA Compliance Manager and indicate that the position has sufficient time and authority to coordinate facility PREA compliance efforts. The ACT data corroborates the responsibilities assigned within the PREA Compliance Policy and Coordinated Response Plan and demonstrates that Ocean Tides has designated a staff member responsible for facility-level PREA coordination.

	Documentation Review The Auditor reviewed the PREA Compliance Policy, Sexual Assault Coordinated Response Plan, Organizational Chart, and Staff Roster. The PREA Compliance Policy assigns ongoing operational responsibilities to the PREA Coordinator, including retaliation monitoring and maintenance of PREA-related documentation. The Coordinated Response Plan further assigns responsibilities for coordinated response activities, document collection, review of incident documentation, communication with statewide PREA officials, and submission of required PREA materials. The Organizational Chart and Staff Roster demonstrate that the Director of Administration serves in a management capacity with authority to coordinate PREA compliance activities. The evidence reviewed demonstrates that Ocean Tides has designated a PREA Compliance Manager with authority to coordinate facility PREA activities. The Director of Administration is assigned responsibilities involving retaliation monitoring, documentation management, coordinated response oversight, and communication with external PREA authorities. Policy requirements, supporting documentation, and ACT responses collectively demonstrate the existence of a facility-level PREA compliance structure intended to support implementation of PREA standards throughout Ocean Tides. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.311(c). Auditor Analysis and Determination The PREA policy, organizational records, role designations, leadership questionnaires, and onsite coordination demonstrated an active zero-tolerance program with identifiable agency and facility leadership. The PREA Coordinator and PREA Compliance Manager were involved in evidence production, operational clarification, and audit verification. No contradictory evidence remained. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.311. Standard Finding Meets Standard

115.312	Contracting with other entities for the confinement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.312 - Contracting with other entities for the confinement of residents Evidence Reviewed

	- Ocean Tides PREA Compliance Policy. - Ocean Tides ACT/PAQ responses for Standard 115.312. - Current Rhode Island DCYF residential-services contract and amendment - Contract oversight materials Provision Analysis 115.312(a) Policy Review and Analysis This provision establishes the following requirement: a public agency that contracts for the confinement of its residents with private agencies or other entities, including other government agencies, shall include in any new contract or contract renewal the entity's obligation to adopt and comply with the PREA standards. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Current Rhode Island DCYF residential-services contract and amendment, Contract oversight materials. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. Ocean Tides operates as a contracted placement provider for the Rhode Island Department of Children, Youth and Families (DCYF). The report further documented that Ocean Tides functions as a contracted placement agency for DCYF. ACT/PAQ Review The ACT confirms that no new or renewed contracts requiring evaluation under this provision were executed during the audit cycle. Documentation Review Based on the documentation reviewed, no evidence was identified indicating the execution or renewal of a confinement contract during the audit period. Therefore, the contractual requirements of this provision were not triggered during the review period. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.312(a). 115.312(b) Policy Review and Analysis This provision establishes the following requirement: any new contract or contract renewal shall provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Current Rhode Island DCYF residential-services contract and amendment, Contract oversight materials. The

	written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. Because no new or renewed confinement contract was identified during the audit cycle, the monitoring requirements described in this provision were not applicable during the review period. These provisions are no longer applicable to the compliance finding. ACT/PAQ Review The ACT reflects that no qualifying contract was executed or renewed during the audit period. Documentation Review The governing Rhode Island DCYF agreement and related contract materials were reviewed. The contract establishes the placement relationship and PREA expectations, and the evidence supported continued oversight of the privately operated juvenile program. No conflicting contract provision was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.312(b). Auditor Analysis and Determination The governing Rhode Island DCYF agreement and related contract materials were reviewed. The contract establishes the placement relationship and PREA expectations, and the evidence supported continued oversight of the privately operated juvenile program. No conflicting contract provision was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.312. Standard Finding Meets Standard

115.313	**Supervision and monitoring**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Standard 115.313 - Supervision and monitoring Evidence Reviewed - Ocean Tides PREA Compliance Policy.

	- Ocean Tides Annual Staffing Plan. - Scope of Work documentation. - First-day staffing and population report. - Seven-day staffing and deployment records. - Unannounced-round records. - Onsite observation checklist. - Random staff interviews. - Ocean Tides ACT/PAQ responses for Standard 115.313. - 2025 Annual Staffing Plan - Annual staffing-plan assessments for 2021-2025 - Current staffing roster and first-day staffing report - Seven-day deployment records - Unannounced-round logs - Facility tour and onsite supervision observations - Random staff interviews Provision Analysis 115.313(a) Policy Review and Analysis This provision establishes the following requirement: the agency shall ensure that each facility it operates shall develop, implement, and document a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect residents against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring, facilities shall take into consideration, including the enumerated elements stated in the provision. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Ocean Tides Annual Staffing Plan., 2025 Annual Staffing Plan, Annual staffing-plan assessments for 2021-2025. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The Ocean Tides PREA Compliance Policy establishes requirements for staffing and monitoring practices designed to protect residents from sexual abuse and sexual harassment. The policy states: "Ocean Tides will operate a staffing plan and video monitoring plan that takes into account: Generally accepted professional standards for juvenile justice practices; composition of the different

	populations within its facilities; number and placement of supervisory staff; programs occurring on each shift; relevant laws, regulations and standards; prevalence of substantiated and unsubstantiated incidents of sexual abuse; and any other relevant factors." The policy requires minimum staff-to-youth ratios of 1:6 during waking hours and 1:15 during sleeping hours. The policy also requires operation of a video monitoring plan as part of the facility's overall prevention strategy. The report further documented that staffing ratios required by the Scope of Work are maintained and that the facility reported no deviations from the staffing plan during the audit period. ACT/PAQ Review ACT responses confirm that Ocean Tides has developed, implemented, and documented a staffing plan and that the plan incorporates the factors required by the standard when determining staffing levels and monitoring needs. Documentation Review The evidence reviewed demonstrates that Ocean Tides maintains a documented staffing plan that addresses resident supervision, staffing levels, monitoring practices, facility operations, and resident safety considerations consistent with the requirements of this provision. First-day records showed 22 youth and 60 current staff. Onsite observation documented direct supervision, approximately 15-minute checks, one housing area, private bedrooms, and supervisor access to camera viewing stations. Actual operating ratios recorded during the tour were approximately 1:4 during daytime operations and 1:8 overnight. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.313(a). 115.313(b) Policy Review and Analysis This provision establishes the following requirement: the agency shall comply with the staffing plan except during limited and discrete exigent circumstances, and shall fully document deviations from the plan during such circumstances. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Ocean Tides Annual Staffing Plan., 2025 Annual Staffing Plan, Annual staffing-plan assessments for 2021-2025. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The Ocean Tides PREA Compliance Policy states: "Any deviations from the plan due to exigent circumstances shall be documented in the Shift Log." This policy requirement establishes a process for documenting and justifying deviations from the staffing plan when circumstances prevent full compliance. The policy and supporting documentation demonstrate that Ocean Tides has established procedures for documenting and justifying staffing-plan deviations when they occur.

ACT/PAQ Review

The Ocean Tides ACT/PAQ response for Standard 115.313 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof.

Documentation Review

The written staffing plan, annual assessments, first-day staffing information, seven-day deployment records, unannounced-round documentation, interviews, and direct observation were mutually consistent. Ocean Tides reported and demonstrated staffing ratios of approximately 1:3 during waking hours and 1:6 overnight, direct supervision, private bedrooms, frequent room checks, supervisory camera access, and no undocumented deviation. These sustained practices materially strengthen supervision beyond the juvenile PREA minimum and are embedded in ordinary operations.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.313(b).

115.313(c)

Policy Review and Analysis

This provision establishes the following requirement: each secure juvenile facility shall maintain staff ratios of a minimum of 1:8 during resident waking hours and 1:16 during resident sleeping hours, except during limited and discrete exigent circumstances, which shall be fully documented. Only security staff shall be included in these ratios. Any facility that, as of the date of publication of this final rule, is not already obligated by law, regulation, or judicial consent decree to maintain the staffing ratios set forth in this paragraph shall have until October 1, 2017, to achieve compliance. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Ocean Tides Annual Staffing Plan., 2025 Annual Staffing Plan, Annual staffing-plan assessments for 2021-2025. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The Ocean Tides PREA Compliance Policy requires annual review of staffing and monitoring practices and states: "On an annual basis Ocean Tides will assess its staffing and monitoring plans to determine if adjustments are needed to the staffing plan, prevailing staffing patterns, video surveillance systems and/or emerging technology, resources committed to adherence to staffing and monitoring plans, and implementation of the policy and practice of having administrative staff conduct and document unannounced rounds." This policy language requires the facility to assess staffing resources, monitoring technology, staffing patterns, and overall adherence to staffing and monitoring requirements on an annual basis.

ACT/PAQ Review

	The Ocean Tides ACT/PAQ response for Standard 115.313 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review The evidence reviewed demonstrates that Ocean Tides has established a formal process for conducting annual staffing-plan assessments consistent with the requirements of this provision. The facility's written minimum ratios are 1:6 during waking hours and 1:15 during sleeping hours. Actual onsite deployment was stronger than both the written plan and the juvenile PREA minimum. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.313(c). 115.313(d) Policy Review and Analysis This provision establishes the following requirement: whenever necessary, but no less frequently than once each year, for each facility the agency operates, in consultation with the PREA coordinator required by § 115.311, the agency shall assess, determine, and document whether adjustments are needed to: (1) The staffing plan established pursuant to paragraph (a) of this section; (2) Prevailing staffing patterns; (3) The facility's deployment of video monitoring systems and other monitoring technologies; and (3) The resources the facility has available to commit to ensure adherence to the staffing plan. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Ocean Tides Annual Staffing Plan., 2025 Annual Staffing Plan, Annual staffing-plan assessments for 2021-2025. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The Ocean Tides PREA Compliance Policy requires implementation of: "the policy and practice of having administrative staff conduct and document unannounced rounds (all shifts) to identify and deter staff sexual abuse and sexual harassments. Policy in place that prohibits staff from alerting other staff members that these supervisory rounds are taking place." ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.313 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review The report noted that staffing levels were maintained, residents were directly supervised, and supervisory monitoring practices were in place throughout facility operations. The evidence reviewed demonstrates that Ocean Tides has established policy requirements for documented unannounced supervisory rounds and prohibits

staff from alerting other employees when such rounds are being conducted, consistent with the requirements of this provision.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.313(d).

115.313(e)

Policy Review and Analysis

This provision establishes the following requirement: each secure facility shall implement a policy and practice of having intermediate- level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Such policy and practice shall be implemented for night shifts as well as day shifts. Each secure facility shall have a policy to prohibit staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Ocean Tides Annual Staffing Plan., 2025 Annual Staffing Plan, Annual staffing-plan assessments for 2021-2025. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address supervision and monitoring and establish the expected practice applicable to 115.313(e). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Ocean Tides ACT/PAQ response for Standard 115.313 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof.

Documentation Review

Relevant evidence included First-day staffing and population report, Seven-day staffing and deployment records, Unannounced-round records, Onsite observation checklist. Unannounced-round logs and staff questionnaires showed administrative rounds across shifts, and staff understood that rounds must not be predictable or announced in advance.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.313(e).

Auditor Analysis and Determination

The written staffing plan, annual assessments, first-day staffing information, seven-day deployment records, unannounced-round documentation, interviews, and direct observation were mutually consistent. Ocean Tides reported and demonstrated

	staffing ratios of approximately 1:3 during waking hours and 1:6 overnight, direct supervision, private bedrooms, frequent room checks, supervisory camera access, and no undocumented deviation. These sustained practices materially strengthen supervision beyond the juvenile PREA minimum and are embedded in ordinary operations. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus exceeds the requirements of Standard 115.313. Standard Finding Exceeds Standard

115.315	**Limits to cross-gender viewing and searches**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.315 - Limits to cross-gender viewing and searches Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Ocean Tides Privacy and Search Policy. - Ocean Tides Resident Handbook. - Ocean Tides Resident Orientation Materials. - Onsite privacy and supervision observations. - Random staff interviews. - Random and targeted youth interviews. - Ocean Tides ACT/PAQ responses for Standard 115.315. - Privacy and Search Policy - Resident Handbook and orientation materials - Facility tour and privacy observations - Random staff interviews - Random and targeted youth interviews

Provision Analysis

115.315(a)

Policy Review and Analysis

This provision establishes the following requirement: the facility shall not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Ocean Tides Privacy and Search Policy., Ocean Tides Resident Handbook., Privacy and Search Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy identifies as prohibited conduct: "Cross-gender searches and pat searches."

ACT/PAQ Review

The Auditor reviewed the Ocean Tides PREA Compliance Policy, Privacy and Search Policy, Resident Handbook, resident orientation materials, and ACT responses applicable to this provision. ACT responses indicate that cross-gender strip searches and cross-gender visual body cavity searches are prohibited except in exigent circumstances or when performed by medical practitioners. The ACT data corroborates the facility's written policy and demonstrates that the facility has incorporated these protections into its PREA program. The evidence reviewed supports the conclusion that Ocean Tides has established procedures intended to protect residents from inappropriate cross-gender search practices.

Documentation Review

This policy establishes Ocean Tides' expectation that residents will be protected from inappropriate cross-gender search practices. The Auditor reviewed supporting policies governing resident searches and privacy protections and found that the facility has established procedures intended to preserve resident dignity while maintaining facility safety and security. The documentation reviewed demonstrates that Ocean Tides has incorporated resident privacy protections into its search procedures and has established expectations regarding professional conduct during search activities. Staff and youth interviews confirmed that female staff announce entry into the all-male housing area. Onsite observation confirmed private single-user restroom, shower, and sleeping arrangements.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.315(a).

115.315(b)

Policy Review and Analysis

	This provision establishes the following requirement: the agency shall not conduct cross-gender pat-down searches except in exigent circumstances. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Ocean Tides Privacy and Search Policy., Ocean Tides Resident Handbook., Privacy and Search Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The Privacy and Search Policy states: "Clothed body searches of a resident are to be conducted in the presence of two staff of the same gender." This policy establishes the facility's requirement that resident searches be conducted by same-gender staff and provides an important safeguard designed to protect resident privacy and dignity during search procedures. The policy also establishes expectations regarding staff conduct and accountability when searches are conducted. ACT/PAQ Review The Auditor reviewed the Ocean Tides Privacy and Search Policy, Resident Handbook, resident orientation materials, and ACT responses applicable to this provision. ACT responses indicate that staff of the same gender conducts clothed body searches and that female staff do not conduct searches of male residents. The ACT data directly corroborates the written policy requirements and demonstrates that the facility's reported practices are consistent with governing policy. Based on the evidence reviewed, Ocean Tides has established and implemented procedures designed to protect resident privacy during search activities. Documentation Review Documentation reviewed demonstrates that Ocean Tides has developed written procedures governing resident searches and has incorporated privacy protections into those procedures. The policy requires searches to be conducted in a manner that minimizes unnecessary intrusion while maintaining institutional safety and security. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.315(b). 115.315(c) Policy Review and Analysis This provision establishes the following requirement: the facility shall document and justify all cross-gender strip searches, cross- gender visual body cavity searches, and cross-gender pat-down searches. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Ocean Tides Privacy and Search Policy., Ocean Tides Resident Handbook., Privacy and Search Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy identifies as prohibited conduct: "Searching or physically

examining a transgender or intersex youth for the sole purpose of determining the youth's genital status." This policy expressly prohibits staff from searching or physically examining a transgender or intersex resident solely to determine the resident's genital status. The policy establishes protections for transgender and intersex residents and reinforces the facility's commitment to preserving resident dignity and privacy.

ACT/PAQ Review

The Auditor reviewed the Ocean Tides PREA Compliance Policy, Privacy and Search Policy, Resident Handbook, resident orientation materials, and ACT responses applicable to this provision. ACT responses indicate that residents are not searched or physically examined for the sole purpose of determining a resident's sex. The ACT data directly corroborates the written policy requirement and demonstrates consistency between policy and reported practice. The evidence reviewed demonstrates that Ocean Tides has established safeguards intended to protect transgender and intersex residents from inappropriate examinations and intrusive practices.

Documentation Review

The Auditor reviewed supporting policies and resident materials and found that Ocean Tides has incorporated protections for transgender and intersex residents into its written procedures. The documentation reviewed demonstrates that resident searches are conducted for legitimate safety and security purposes and not for the purpose of determining a resident's sex or genital status.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.315(c).

115.315(d)

Policy Review and Analysis

This provision establishes the following requirement: the facility shall implement policies and procedures that 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 or when such viewing is incidental to routine cell checks. Such policies and procedures shall require staff of the opposite gender to announce their presence when entering a resident housing unit. and the remaining elements stated in the provision. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Ocean Tides Privacy and Search Policy., Ocean Tides Resident Handbook., Privacy and Search Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy identifies as prohibited conduct: "Opposite gender viewing of youth under circumstances when breasts, buttocks or genitalia would normally be exposed (shower/hygiene time, performing bodily

	functions, and changing clothes)." This policy establishes protections intended to prevent unnecessary opposite-gender viewing of residents while showering, changing clothing, or performing bodily functions. The policy requires staff of the opposite gender to announce their presence when entering living units or other areas where residents may be in a state of undress. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, Privacy and Search Policy, Resident Handbook, resident orientation materials, and ACT responses applicable to this provision. ACT responses indicate that staff announce their presence when entering areas where residents may be showering, performing bodily functions, or changing clothing. The ACT data corroborates the written policy requirements and demonstrates that these privacy protections have been incorporated into facility operations. Based on the evidence reviewed, Ocean Tides has established procedures designed to protect resident privacy while maintaining appropriate supervision and facility security. Documentation Review The Auditor reviewed the Privacy and Search Policy, which reinforces these privacy protections by requiring staff announcements when entering resident dormitories and areas where residents may be showering or performing bodily functions. Resident materials further support implementation by informing residents of privacy protections and facility expectations. Onsite observation verified that youth could shower, toilet, and change clothing without nonmedical staff viewing breasts, buttocks, or genitalia except as required for safety. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.315(d). 115.315(e) Policy Review and Analysis This provision is no longer applicable to your compliance finding. ACT/PAQ Review This subsection was excluded from the facility compliance determination under the current DOJ audit instructions. ACT/PAQ information was not used to create a separate implementation finding for this subsection. Documentation Review No separate facility implementation determination was made for this subsection. The subsection was handled using the same exclusion language used in the current production model. This subsection was excluded from the compliance determination for Standard 115.315.

	115.315(f) Policy Review and Analysis This provision is no longer applicable to your compliance finding. ACT/PAQ Review This subsection was excluded from the facility compliance determination under the current DOJ audit instructions. ACT/PAQ information was not used to create a separate implementation finding for this subsection. Documentation Review No separate facility implementation determination was made for this subsection. The subsection was handled using the same exclusion language used in the current production model. This subsection was excluded from the compliance determination for Standard 115.315. Auditor Analysis and Determination The Privacy and Search Policy, training records, staff and youth interviews, and onsite observation demonstrated privacy protections in practice. Same-gender staff conduct resident searches, opposite-gender staff announce entry, and private single-user sleeping, shower, toilet, and changing arrangements reduce unnecessary viewing. No cross-gender search or viewing concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.315. Standard Finding Meets Standard

115.316	**Residents with disabilities and residents who are limited English proficient**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.316 - Residents with disabilities and residents who are limited English proficient Evidence Reviewed - Ocean Tides PREA Compliance Policy.

	- Resident Handbook. - Resident Orientation Materials. - PREA Educational Materials. - Targeted youth interviews. - Interpreter and communication-service verification. - Ocean Tides ACT/PAQ responses for Standard 115.316. - Non-Discrimination Policy - English- and Spanish-language PREA materials - Resident Handbook - Staff and youth interviews Provision Analysis 115.316(a) Policy Review and Analysis This provision establishes the following requirement: the agency shall take appropriate steps to ensure that residents with disabilities (including, for example, residents who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. and the remaining elements stated in the provision. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Non-Discrimination Policy, Resident Handbook. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Ocean Tides is committed to the equal opportunity to participate in and benefit from all aspects of the agency's efforts to prevent, detect and respond to sexual abuse, assault and harassment." This policy establishes the facility's commitment to ensuring that all residents, including residents with disabilities, have equal access to PREA protections, reporting mechanisms, education, and services. The policy recognizes the facility's responsibility to provide residents with meaningful access to information and services necessary to prevent, detect, and respond to sexual abuse and sexual harassment. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, Resident Handbook, PREA educational materials, and ACT responses applicable to this provision. ACT

responses indicate that residents with disabilities are provided equal opportunity to participate in and benefit from all aspects of the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The ACT data corroborates the facility's written policy and demonstrates that accessibility requirements have been incorporated into facility operations. Based on the evidence reviewed, Ocean Tides has established procedures intended to ensure residents with disabilities have meaningful access to PREA-related information and services.

Documentation Review

The Auditor reviewed resident educational materials and the Resident Handbook and found that Ocean Tides has established procedures designed to ensure residents receive PREA-related information regarding their rights, reporting options, and available services. The documentation reviewed demonstrates that the facility has incorporated accessibility considerations into its PREA program and has established procedures intended to ensure equal access to PREA protections. The first-day population report identified two youth with cognitive or functional disabilities and four youth with limited English proficiency. Targeted interviews and onsite verification confirmed access to contracted interpretation and communication support.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.316(a).

115.316(b)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to residents who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Non-Discrimination Policy, Resident Handbook. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Ocean Tides is committed to the equal opportunity to participate in and benefit from all aspects of the agency's efforts to prevent, detect and respond to sexual abuse, assault and harassment." This policy applies equally to residents with limited English proficiency and establishes the facility's responsibility to provide meaningful access to PREA-related information and services. The policy supports the facility's obligation to ensure that language barriers do not prevent residents from understanding their rights, reporting sexual abuse or sexual harassment, or accessing available services.

ACT/PAQ Review

	The Auditor reviewed the Ocean Tides PREA Compliance Policy, Resident Handbook, PREA educational materials, and ACT responses applicable to this provision. ACT responses indicate that interpreter services are available when necessary and that residents with limited English proficiency are provided meaningful access to PREA-related information and services. The ACT data corroborates the facility's written policy and demonstrates implementation of language-access procedures. Based on the evidence reviewed, Ocean Tides has established procedures intended to ensure residents with limited English proficiency have access to PREA protections and reporting mechanisms. Documentation Review Documentation reviewed demonstrates that Ocean Tides provides PREA-related information through resident orientation materials, educational resources, and communication methods intended to ensure resident understanding. The documentation reviewed supports the facility's efforts to provide meaningful access to information regardless of a resident's primary language. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.316(b). 115.316(c) Policy Review and Analysis This provision establishes the following requirement: the agency 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 the resident's safety, the performance of firstresponse duties under § 115.364, or the investigation of the resident's allegations. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Non-Discrimination Policy, Resident Handbook. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy establishes the facility's commitment to ensuring equal access to PREA protections and services for all residents. This commitment includes providing residents with appropriate assistance necessary to understand and access PREA-related information and services. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, Resident Handbook, PREA educational materials, and ACT responses applicable to this provision. ACT responses indicate that resident interpreters, resident readers, or other resident assistants are not used except in limited circumstances where an extended delay could compromise resident safety, the performance of first-response duties, or an investigation. The ACT data demonstrates that Ocean Tides relies on appropriate communication assistance resources rather than resident assistants whenever

	possible. Based on the evidence reviewed, the facility has established procedures consistent with the requirements of this provision. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures intended to provide residents with access to qualified assistance when communication support is necessary. The facility's PREA program is designed to ensure residents can report allegations, participate in investigations, and access services regardless of disability status or language barriers. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.316(c). Auditor Analysis and Determination Policy, translated materials, resident education, staff interviews, youth interviews, and onsite observations demonstrated that disability or language needs would not prevent access to PREA information, reporting, or services. English- and Spanish-language materials were available, and staff described appropriate use of qualified assistance rather than resident interpreters except in a true emergency. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.316. Standard Finding Meets Standard

115.317	**Hiring and promotion decisions**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.317 - Hiring and promotion decisions Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Human Resources Policies. - Employee Application Materials. - Background Investigation Documentation. - Five employee background-check records.

- Human Resources questionnaire.

- Ocean Tides ACT/PAQ responses for Standard 115.317.

- Criminal Background and DCYF Clearance Policy

- Full 12-month staff roster

- Five auditor-selected employee background-check files

- Employee criminal-history affidavits

- Human Resources questionnaire

Provision Analysis

115.317(a)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall not hire or promote anyone who may have contact with residents, and shall not enlist the services of any contractor who may have contact with residents, who, including the enumerated elements stated in the provision. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Criminal Background and DCYF Clearance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Any employee who engages in, fails to report, or knowingly condones sexual abuse, sexual harassment, voyeurism, or inappropriate relationships with youth shall be subject to disciplinary action, up to and including termination and referral for criminal prosecution when appropriate." This policy establishes the facility's expectation that employees maintain professional boundaries and reinforces the importance of screening and hiring practices designed to protect residents from sexual abuse and sexual harassment.

ACT/PAQ Review

The Auditor reviewed the Ocean Tides PREA Compliance Policy, Human Resources policies, employee application materials, and ACT responses applicable to this provision. ACT responses indicate that criminal background records checks are conducted for all employees and that applicants are asked about prior sexual misconduct described in PREA standards. The ACT data corroborates the facility's hiring and screening practices and demonstrates implementation of procedures designed to protect residents from potential abuse. Based on the evidence reviewed, Ocean Tides has established hiring practices consistent with the requirements of this provision.

Documentation Review

	Documentation reviewed demonstrates that Ocean Tides has established hiring procedures that include criminal history reviews and screening measures designed to identify applicants who may pose a risk to resident safety. Human Resources documentation reviewed supports the facility's efforts to make informed hiring decisions consistent with PREA requirements. Five employee background-check records, the full current staff roster, the Human Resources questionnaire, contractor and volunteer records, and criminal-history affidavits were reviewed. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.317(a). 115.317(b) Policy Review and Analysis This provision establishes the following requirement: the agency shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Criminal Background and DCYF Clearance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address hiring and promotion decisions and establish the expected practice applicable to 115.317(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed Human Resources policies, background investigation procedures, and ACT responses applicable to this provision. ACT responses indicate that criminal background records checks are conducted in accordance with applicable laws and regulations and that screening procedures include review of information relevant to PREA requirements. The ACT data corroborates the facility's written hiring and promotion practices. Based on the evidence reviewed, Ocean Tides has established screening procedures designed to support safe hiring and promotion decisions. Documentation Review Documentation reviewed demonstrates that Ocean Tides conducts criminal background records checks and considers information relevant to resident safety when evaluating applicants and promotional candidates. The facility's screening process is intended to identify individuals whose employment or promotion may present a risk to residents. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.317(b). 115.317(c)

	Policy Review and Analysis This provision establishes the following requirement: before hiring new employees who may have contact with residents, the agency shall: (1) Perform a criminal background records check; (2) Consults any child abuse registry maintained by the State or locality in which the employee would work; and (3) Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Criminal Background and DCYF Clearance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address hiring and promotion decisions and establish the expected practice applicable to 115.317(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed Human Resources policies, contractor screening procedures, and ACT responses applicable to this provision. ACT responses indicate that criminal background records checks are conducted for contractors who may have contact with residents. The ACT data corroborates the facility's contractor screening practices and demonstrates implementation of procedures intended to protect residents from sexual abuse and sexual harassment. Based on the evidence reviewed, Ocean Tides has established contractor screening procedures consistent with the requirements of this provision. Documentation Review Documentation reviewed demonstrates that Ocean Tides requires screening of contractors who may have contact with residents. The facility's procedures establish expectations regarding contractor suitability and resident safety. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.317(c). 115.317(d) Policy Review and Analysis This provision establishes the following requirement: the agency shall also perform a criminal background records check, and consult applicable child abuse registries, before enlisting the services of any contractor who may have contact with residents. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Criminal Background and DCYF Clearance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence

rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address hiring and promotion decisions and establish the expected practice applicable to 115.317(d). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Auditor reviewed Human Resources policies, employment application materials, and ACT responses applicable to this provision. ACT responses indicate that applicants are asked about prior sexual misconduct described in PREA standards. The ACT data corroborates the facility's application and screening practices and demonstrates implementation of procedures intended to identify disqualifying conduct. Based on the evidence reviewed, Ocean Tides has established applicant screening practices consistent with this provision.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides requires applicants to disclose information relevant to prior sexual misconduct and employment history. These requirements support the facility's ability to evaluate applicant suitability and identify individuals who may present a risk to residents.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.317(d).

115.317(e)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have in place a system for otherwise capturing such information for current employees. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Criminal Background and DCYF Clearance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address hiring and promotion decisions and establish the expected practice applicable to 115.317(e). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Auditor reviewed Human Resources policies and ACT responses applicable to this provision. ACT responses indicate that material omissions regarding sexual misconduct or the provision of materially false information are grounds for termination. The ACT data corroborates the facility's employment practices and demonstrates implementation of accountability measures consistent with PREA requirements. Based on the evidence reviewed, Ocean Tides has established

procedures addressing false or incomplete information provided during the hiring process.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides maintains procedures requiring applicants and employees to provide accurate and complete information during the hiring process. These procedures support informed employment decisions and accountability throughout the employment relationship.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.317(e).

115.317(f)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall also ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions and in any interviews or written self- evaluations conducted as part of reviews of current employees. The agency shall also impose upon employees a continuing affirmative duty to disclose any such misconduct. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Criminal Background and DCYF Clearance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address hiring and promotion decisions and establish the expected practice applicable to 115.317(f). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Auditor reviewed Human Resources policies and ACT responses applicable to this provision. ACT responses indicate that background checks and employment screening practices are conducted in accordance with applicable laws and regulations. The ACT data corroborates the facility's procedures governing employment-related information sharing. Based on the evidence reviewed, Ocean Tides has established practices consistent with the requirements of this provision.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides maintains procedures governing employment references, background inquiries, and the exchange of information regarding former employees when permitted by law. These procedures support informed hiring decisions and resident safety.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.317(f).

115.317(g)

Policy Review and Analysis

This provision establishes the following requirement: material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Criminal Background and DCYF Clearance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address hiring and promotion decisions and establish the expected practice applicable to 115.317(g). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Ocean Tides ACT/PAQ response for Standard 115.317 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof.

Documentation Review

Relevant evidence included Five employee background-check records, Human Resources questionnaire, Current staff, contractor, and volunteer rosters.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.317(g).

115.317(h)

Policy Review and Analysis

This provision establishes the following requirement: unless prohibited by law, the agency 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. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Criminal Background and DCYF Clearance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address hiring and promotion decisions and establish the expected practice applicable to 115.317(h). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Ocean Tides ACT/PAQ response for Standard 115.317 was reviewed as corroborative evidence. The response was compared with policy, records,

	questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Five employee background-check records, Human Resources questionnaire, Current staff, contractor, and volunteer rosters. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.317(h). Auditor Analysis and Determination The Auditor reviewed the full 12-month staff roster and five selected personnel files. Background-check results, criminal-history affidavits, application screening, and Human Resources responses were consistent with the agency's written requirements. No disqualifying information or material omission was identified in the reviewed files. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.317. Standard Finding Meets Standard

115.318	**Upgrades to facilities and technologies**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.318 - Upgrades to facilities and technologies Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Annual Staffing Plan Assessments. - Facility Planning Documentation. - Video-monitoring documentation. - Onsite facility tour and camera-viewing verification. - Ocean Tides ACT/PAQ responses for Standard 115.318. - Annual staffing-plan assessments

- Video-monitoring documentation

- Facility tour and direct observation

Provision Analysis

115.318(a)

Policy Review and Analysis

This provision establishes the following requirement: when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect residents from sexual abuse. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Annual Staffing Plan Assessments., Facility Planning Documentation., Annual staffing-plan assessments. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "On an annual basis Ocean Tides will assess its staffing and monitoring plans to determine if adjustments are needed to the staffing plan, prevailing staffing patterns, video surveillance systems and/or emerging technology." This policy demonstrates the facility's commitment to evaluating facility operations, staffing practices, and monitoring systems in support of resident safety and PREA compliance. The policy requires consideration of physical plant and monitoring factors that may impact the facility's ability to protect residents from sexual abuse and sexual harassment.

ACT/PAQ Review

The Auditor reviewed the Ocean Tides PREA Compliance Policy, Annual Staffing Plan Assessments, facility planning documentation, and ACT responses applicable to this provision. ACT responses indicate that the facility considers the impact of facility design, expansion, and modification decisions on its ability to protect residents from sexual abuse. The ACT data corroborates the facility's planning and assessment practices. Based on the evidence reviewed, Ocean Tides has established procedures intended to ensure resident safety considerations are incorporated into facility planning decisions.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides conducts annual assessments of staffing and monitoring practices and considers facility operations and supervision needs as part of those reviews. These assessments support ongoing evaluation of facility conditions and resident safety considerations.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.318(a).

115.318(b)

	Policy Review and Analysis This provision establishes the following requirement: when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency's ability to protect residents from sexual abuse. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Annual Staffing Plan Assessments., Facility Planning Documentation., Annual staffing-plan assessments. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "On an annual basis Ocean Tides will assess its staffing and monitoring plans to determine if adjustments are needed to the staffing plan, prevailing staffing patterns, video surveillance systems and/or emerging technology." This policy requires ongoing evaluation of monitoring systems and emerging technologies that may enhance resident safety and improve the facility's ability to detect, prevent, and respond to sexual abuse and sexual harassment. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, Annual Staffing Plan Assessments, facility planning documentation, and ACT responses applicable to this provision. ACT responses indicate that the facility considers how video monitoring systems, electronic surveillance systems, and other monitoring technologies may enhance its ability to protect residents from sexual abuse. The ACT data corroborates the facility's written procedures and demonstrates consideration of technology as part of the facility's PREA program. Based on the evidence reviewed, Ocean Tides has established procedures consistent with the requirements of this provision. Documentation Review Documentation reviewed demonstrates that Ocean Tides evaluates monitoring systems and technology as part of its annual staffing and monitoring assessments. These reviews support informed decisions regarding surveillance capabilities and facility safety enhancements. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.318(b). Auditor Analysis and Determination Annual staffing assessments and direct observation showed that Ocean Tides considers sexual-safety effects when evaluating the physical plant and monitoring technology. Video monitoring supplements, rather than replaces, direct supervision. No audit-period construction or substantial technology acquisition created an unresolved requirement. Based on the totality of the evidence, the Auditor determined that Ocean Tides

	School - Narragansett Campus meets the requirements of Standard 115.318. Standard Finding Meets Standard

115.321	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.321 - Evidence protocol and forensic medical examinations Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Sexual Assault Coordinated Response Plan. - Memoranda of Understanding and Community Resource Documentation. - Medical questionnaire. - Hasbro Children's Hospital/Aubin Center information. - Day One MOU dated July 2026. - Ocean Tides ACT/PAQ responses for Standard 115.321. - Reporting and Responding to Alleged Abuse and Neglect Policy - Coordinated Response Plan - SAFE/SANE information - Signed 2026 Day One MOU - Medical and victim-advocacy questionnaires Provision Analysis 115.321(a) Policy Review and Analysis This provision establishes the following requirement: to the extent the agency is responsible for investigating allegations of sexual abuse, the agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance

	Policy., Sexual Assault Coordinated Response Plan., Day One MOU dated July 2026., Reporting and Responding to Alleged Abuse and Neglect Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Ocean Tides will follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions." This policy establishes the facility's commitment to preserving evidence and following appropriate procedures when allegations of sexual abuse are reported. The policy supports the facility's responsibility to ensure evidence collection practices are conducted in a manner that protects the integrity of investigations and potential prosecutions. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, Sexual Assault Coordinated Response Plan, community resource documentation, and ACT responses applicable to this provision. ACT responses indicate that Ocean Tides follows a uniform evidence protocol adapted from a developmentally appropriate protocol. The ACT data corroborates the facility's written procedures and demonstrates implementation of evidence preservation practices consistent with PREA requirements. Based on the evidence reviewed, Ocean Tides has established procedures intended to maximize the potential for obtaining usable physical evidence following allegations of sexual abuse. Documentation Review The Auditor reviewed the Sexual Assault Coordinated Response Plan and related documentation and found that Ocean Tides has established procedures governing evidence preservation, reporting, notification requirements, and coordination with outside entities. The documentation reviewed demonstrates that the facility has developed a coordinated response process designed to preserve evidence and support investigative activities. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.321(a). 115.321(b) Policy Review and Analysis This provision establishes the following requirement: the protocol shall be developmentally appropriate for youth and, as appropriate, shall be adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Day One MOU dated July 2026.,

	Reporting and Responding to Alleged Abuse and Neglect Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services." This policy establishes the facility's responsibility to ensure residents receive appropriate medical and crisis intervention services following allegations of sexual abuse. The policy supports timely access to treatment and services designed to address the immediate and ongoing needs of victims. ACT/PAQ Review The Auditor reviewed the PREA Compliance Policy, Sexual Assault Coordinated Response Plan, community resource documentation, and ACT responses applicable to this provision. ACT responses indicate that residents who experience sexual abuse have access to forensic medical examinations when evidentiary or medically appropriate and that examinations are provided without financial cost to the resident. The ACT data corroborates the facility's written procedures and demonstrates implementation of services intended to support victims of sexual abuse. Based on the evidence reviewed, Ocean Tides has established procedures consistent with the requirements of this provision. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures for obtaining medical services and coordinating responses with outside providers when necessary. The Sexual Assault Coordinated Response Plan identifies responsibilities for obtaining emergency medical care and facilitating access to outside services. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.321(b). 115.321(c) Policy Review and Analysis This provision establishes the following requirement: the agency shall offer all residents who experienced sexual abuse access to forensic medical examinations whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The agency shall document its efforts to provide SAFEs or SANEs. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Day One MOU dated July 2026., Reporting and Responding to Alleged Abuse and Neglect Policy. The written requirements were treated as the

agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Residents shall be offered access to victim advocacy services when available." This policy establishes the facility's commitment to providing residents with access to victim advocacy and emotional support services following allegations of sexual abuse.

ACT/PAQ Review

The Auditor reviewed the PREA Compliance Policy, community resource documentation, and ACT responses applicable to this provision. ACT responses indicate that victim advocacy and support services are available and that residents may receive support from outside victim advocates or qualified staff when requested. The ACT data corroborates the facility's written procedures and demonstrates implementation of victim support services consistent with PREA requirements. Based on the evidence reviewed, Ocean Tides has established procedures intended to ensure residents have access to advocacy and support services following allegations of sexual abuse.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides maintains relationships with community resources and support providers capable of assisting residents who experience sexual abuse. These resources support the facility's efforts to provide trauma-informed services and emotional support to victims. The July 2026 Day One MOU documents victim-advocacy and emotional-support services. Hasbro Children's Hospital/Aubin Center information identifies the community medical resource for forensic services.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.321(c).

115.321(d)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the agency shall make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member. Agencies shall document efforts to secure services from rape crisis centers. For the purpose of this standard, a rape crisis center refers to an entity that provides intervention and related assistance, such as the services specified in 42 U.S.C. 14043g(b)(2)(C), to victims of sexual assault of all ages. and the remaining elements stated in the provision. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Day One MOU dated July 2026., Reporting and Responding to Alleged Abuse and Neglect Policy. The written requirements were treated as the agency's expected practice and were

	tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address evidence protocol and forensic medical examinations and establish the expected practice applicable to 115.321(d). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.321 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Medical questionnaire, Hasbro Children's Hospital/Aubin Center information, Day One MOU dated July 2026. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.321(d). 115.321(e) Policy Review and Analysis This provision establishes the following requirement: as requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Day One MOU dated July 2026., Reporting and Responding to Alleged Abuse and Neglect Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address evidence protocol and forensic medical examinations and establish the expected practice applicable to 115.321(e). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.321 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Medical questionnaire, Hasbro Children's Hospital/Aubin

	Center information, Day One MOU dated July 2026. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.321(e). 115.321(f) Policy Review and Analysis This provision establishes the following requirement: to the extent the agency itself is not responsible for investigating allegations of sexual abuse, the agency shall request that the investigating agency follow the requirements of paragraphs (a) through (e) of this section. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Day One MOU dated July 2026., Reporting and Responding to Alleged Abuse and Neglect Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.321 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The reviewed response framework identified evidence-preservation responsibilities, access to an outside forensic medical provider, victim advocacy, emotional support, and cost protections. No audit-period allegation required a forensic examination. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.321(f). 115.321(g) Policy Review and Analysis This provision is designated by DOJ as 'Not Audited by the Auditor' and is excluded from compliance determinations. The Auditor did not request documentation, conduct interviews, or assess implementation for this subsection. Its exclusion does not affect the compliance determination for this standard. ACT/PAQ Review This subsection was excluded from the facility compliance determination under the current DOJ audit instructions. ACT/PAQ information was not used to create a separate implementation finding for this subsection.

	Documentation Review No separate facility implementation determination was made for this subsection. The subsection was handled using the same exclusion language used in the current production model. This subsection was excluded from the compliance determination for Standard 115.321. 115.321(h) Policy Review and Analysis This provision establishes the following requirement: for the purposes of this standard, a qualified agency staff member or a qualified community-based staff member shall be 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. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Day One MOU dated July 2026., Reporting and Responding to Alleged Abuse and Neglect Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.321 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The reviewed response framework identified evidence-preservation responsibilities, access to an outside forensic medical provider, victim advocacy, emotional support, and cost protections. No audit-period allegation required a forensic examination. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.321(h). Auditor Analysis and Determination The coordinated-response framework, SAFE/SANE information, medical procedures, victim-advocacy resources, and signed 2026 Day One MOU established the required response resources. No allegation during the review period required a forensic examination, but the available procedures identified evidence preservation, outside examination, cost protection, advocacy, and support responsibilities. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.321.

	Standard Finding Meets Standard

115.322	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.322 - Policies to ensure referrals of allegations for investigations Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Sexual Assault Coordinated Response Plan. - Reporting and Investigation Documentation. - Facility policy and referral procedures. - Data Collection Part Two. - Entrance-meeting verification concerning DCYF/CPS and law-enforcement roles. - Ocean Tides ACT/PAQ responses for Standard 115.322. - Reporting and Responding to Alleged Abuse and Neglect Policy - Investigator training certificate - Audit-period allegation and investigation records - Exit Meeting Agenda onsite investigation verification - RSAS-106 Exit Meeting Agenda for Ocean Tides Provision Analysis 115.322(a) Policy Review and Analysis This provision establishes the following requirement: the agency shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Facility policy and referral procedures., Reporting and Responding to

	Alleged Abuse and Neglect Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "All allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, shall be investigated." This policy establishes the facility's requirement that all allegations of sexual abuse and sexual harassment be referred for investigation regardless of how the allegation is received. The policy supports accountability, resident safety, and compliance with PREA investigative requirements. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, Sexual Assault Coordinated Response Plan, investigative documentation, and ACT responses applicable to this provision. ACT responses indicate that all allegations of sexual abuse and sexual harassment are referred for investigation and that allegations involving potentially criminal conduct are referred to law enforcement. The ACT data corroborates the facility's written procedures and demonstrates implementation of investigative referral requirements. Based on the evidence reviewed, Ocean Tides has established procedures ensuring allegations are referred for investigation consistent with PREA requirements. Documentation Review The Auditor reviewed the Sexual Assault Coordinated Response Plan and related documentation and found that Ocean Tides has established procedures governing reporting, notification, referral, and investigative responsibilities. The documentation reviewed demonstrates that allegations are subject to review and referral in accordance with established procedures. Data Collection Part Two reports one youth-on-youth sexual-harassment allegation, one administrative investigation, and an unfounded outcome. Entrance verification identified DCYF/CPS as the administrative investigative authority and law enforcement as the criminal authority when applicable. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.322(a). 115.322(b) Policy Review and Analysis This provision establishes the following requirement: the agency shall have in place a policy to ensure that allegations of sexual abuse and/or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The agency shall publish such policy on its website or, if it does not have one, make

	the policy available through other means. The agency shall document all such referrals. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Facility policy and referral procedures., Reporting and Responding to Alleged Abuse and Neglect Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address policies to ensure referrals of allegations for investigations and establish the expected practice applicable to 115.322(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed the PREA Compliance Policy, reporting procedures, and ACT responses applicable to this provision. ACT responses indicate that referral procedures are documented in policy and implemented by the facility. The ACT data corroborates the written procedures reviewed by the Auditor and demonstrates consistency between policy and practice. Based on the evidence reviewed, Ocean Tides has established and implemented procedures governing the referral of allegations for investigation. Documentation Review Documentation reviewed demonstrates that Ocean Tides maintains written procedures governing the referral of allegations for investigation and identifies responsibilities associated with investigative referrals. These procedures establish a framework for ensuring allegations receive appropriate review and investigative follow-up. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.322(b). 115.322(c) Policy Review and Analysis This provision establishes the following requirement: if a separate entity is responsible for conducting criminal investigations, such publication shall describe the responsibilities of both the agency and the investigating entity. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Facility policy and referral procedures., Reporting and Responding to Alleged Abuse and Neglect Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA

policy and related procedures address policies to ensure referrals of allegations for investigations and establish the expected practice applicable to 115.322(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Ocean Tides ACT/PAQ response for Standard 115.322 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof.

Documentation Review

Relevant evidence included Facility policy and referral procedures, Data Collection Part Two, Entrance-meeting verification concerning DCYF/CPS and law-enforcement roles. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.322(c).

115.322(d)

Policy Review and Analysis

This provision is designated by DOJ as 'Not Audited by the Auditor' and is excluded from compliance determinations. The Auditor did not request documentation, conduct interviews, or assess implementation for this subsection. Its exclusion does not affect the compliance determination for this standard.

ACT/PAQ Review

This subsection was excluded from the facility compliance determination under the current DOJ audit instructions. ACT/PAQ information was not used to create a separate implementation finding for this subsection.

Documentation Review

No separate facility implementation determination was made for this subsection. The subsection was handled using the same exclusion language used in the current production model.

This subsection was excluded from the compliance determination for Standard 115.322.

115.322(e)

Policy Review and Analysis

	This provision is designated by DOJ as 'Not Audited by the Auditor' and is excluded from compliance determinations. The Auditor did not request documentation, conduct interviews, or assess implementation for this subsection. Its exclusion does not affect the compliance determination for this standard. ACT/PAQ Review This subsection was excluded from the facility compliance determination under the current DOJ audit instructions. ACT/PAQ information was not used to create a separate implementation finding for this subsection. Documentation Review No separate facility implementation determination was made for this subsection. The subsection was handled using the same exclusion language used in the current production model. This subsection was excluded from the compliance determination for Standard 115.322. Auditor Analysis and Determination Policy and reporting procedures require prompt referral of allegations for administrative and, when indicated, criminal investigation. The single audit-period youth-on-youth sexual-harassment allegation was administratively investigated and determined unfounded. The Auditor reviewed the matter onsite and recorded no issue or concern in the Exit Meeting Agenda. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.322. Standard Finding Meets Standard

115.331	**Employee training**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Standard 115.331 - Employee training Evidence Reviewed - Ocean Tides PREA Compliance Policy. - PREA Employee Training Curriculum.

	- Employee Training Records. - Training Acknowledgement Forms. - Training curriculum and refresher modules. - Training certificates and acknowledgments. - Twelve random staff interviews. - Ocean Tides ACT/PAQ responses for Standard 115.331. - Employee PREA training curriculum - Thirteen PREA refresher modules - Employee training acknowledgments and records - Twelve random staff interviews Provision Analysis 115.331(a) Policy Review and Analysis This provision establishes the following requirement: the agency shall train all employees who may have contact with residents on, including the enumerated elements stated in the provision. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Ocean Tides shall train all employees who may have contact with youth on its zero-tolerance policy for sexual abuse and sexual harassment and how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures." This policy establishes the facility's requirement that staff receive PREA training sufficient to support implementation of the agency's prevention, detection, reporting, and response responsibilities. The policy identifies employee training as a critical component of the facility's PREA program and establishes expectations regarding employee knowledge and professional conduct. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, employee training curriculum, training records, acknowledgement forms, and ACT responses applicable to this provision. ACT responses indicate that all employees who may have contact with residents receive PREA training and that employees receive instruction regarding the facility's zero-tolerance policy and resident rights. The ACT data corroborates the facility's written policy and demonstrates implementation of

	employee training requirements. Based on the evidence reviewed, Ocean Tides has established a training program designed to ensure staff understand their responsibilities under PREA. Documentation Review The Auditor reviewed employee training materials and training records and found that Ocean Tides has established a structured PREA training program for employees who may have contact with residents. The documentation reviewed demonstrates that staff receive instruction regarding resident rights, reporting responsibilities, professional boundaries, first responder responsibilities, and other PREA-related topics necessary to support resident safety. Twelve random staff interviews showed consistent knowledge of zero tolerance, reporting, first response, confidentiality, privacy, retaliation, and disciplinary consequences. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.331(a). 115.331(b) Policy Review and Analysis This provision establishes the following requirement: such training shall be tailored to the unique needs and attributes of residents of juvenile facilities and 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 that houses only male residents to a facility that houses only female residents, or vice versa. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Training shall be tailored to the unique needs and attributes of youth in confinement and to the gender of the youth at the facility." This policy requires training that addresses the specific needs of youth in a residential setting and recognizes the importance of preparing staff to work effectively with the resident population served by the facility. ACT/PAQ Review The Auditor reviewed employee training materials, training records, and ACT responses applicable to this provision. ACT responses indicate that employees receive training appropriate to their responsibilities and the population served by the facility. The ACT data corroborates the facility's training practices and demonstrates implementation of training requirements consistent with this provision. Documentation Review Documentation reviewed demonstrates that Ocean Tides provides PREA training designed specifically for staff working with youth in a residential environment.

	Training materials reviewed address topics relevant to adolescent development, professional boundaries, resident safety, and the prevention of sexual abuse and sexual harassment. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.331(b). 115.331(c) Policy Review and Analysis This provision establishes the following requirement: all current employees who have not received such training shall be trained within one year of the effective date of the PREA standards, and the agency shall provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures. In years in which an employee does not receive refresher training, the agency shall provide refresher information on current sexual abuse and sexual harassment policies. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "All employees shall receive refresher training as necessary to ensure knowledge of the agency's current sexual abuse and sexual harassment policies and procedures." This policy establishes the facility's responsibility to ensure staff remain informed regarding PREA requirements and changes to agency policies and procedures. Ongoing training supports consistency in practice and reinforces employee responsibilities regarding resident safety. ACT/PAQ Review The Auditor reviewed employee training records, training schedules, and ACT responses applicable to this provision. ACT responses indicate that employees receive ongoing PREA training and updates regarding agency policies and procedures. The ACT data corroborates the facility's written requirements and demonstrates implementation of refresher training practices. Documentation Review Documentation reviewed demonstrates that Ocean Tides maintains training records and provides continuing PREA-related instruction to staff. The documentation reviewed supports the facility's efforts to maintain employee knowledge of current PREA requirements. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.331(c). 115.331(d) Policy Review and Analysis

	This provision establishes the following requirement: the agency shall document, through employee signature or electronic verification, that employees understand the training they have received. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy requires employees to comply with PREA-related policies, procedures, and training requirements established by the agency. ACT/PAQ Review The Auditor reviewed training acknowledgement forms, employee training records, and ACT responses applicable to this provision. ACT responses indicate that employees acknowledge in writing that they understand the training they have received. The ACT data corroborates the facility's training documentation practices and demonstrates implementation of accountability measures associated with employee training requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides maintains records documenting employee participation in PREA training. Training acknowledgement forms reviewed by the Auditor provide evidence that employees received and understood PREA-related instruction. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.331(d). Auditor Analysis and Determination The curriculum, training records, acknowledgments, thirteen topic-specific refresher modules, and twelve random staff interviews demonstrated a recurring and role-relevant training system. Staff consistently described zero tolerance, immediate reporting, first-responder actions, privacy protections, evidence preservation, and retaliation safeguards. The repeated instruction and consistently demonstrated knowledge materially exceed minimum training delivery. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus exceeds the requirements of Standard 115.331. Standard Finding Exceeds Standard

115.332	**Volunteer and contractor training**

	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.332 - Volunteer and contractor training Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Training Records. - Acknowledgement Forms. - One completed volunteer questionnaire. - Training acknowledgments. - Ocean Tides ACT/PAQ responses for Standard 115.332. - Volunteer questionnaire - Contractor questionnaire - Volunteer and contractor training records Provision Analysis 115.332(a) Policy Review and Analysis This provision establishes the following requirement: the agency shall ensure that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Contractor questionnaire, Volunteer and contractor training records. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "All volunteers and contractors who have contact with youth shall be trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures." This policy establishes the facility's requirement that volunteers and contractors understand their responsibilities regarding PREA compliance and resident safety. The policy recognizes that individuals who interact with residents must be aware of reporting requirements, professional boundaries, and expectations regarding sexual abuse prevention. ACT/PAQ Review

	The Auditor reviewed the Ocean Tides PREA Compliance Policy, volunteer and contractor training materials, training records, and ACT responses applicable to this provision. ACT responses indicate that volunteers and contractors who have contact with residents receive PREA training and are informed of the facility's zero-tolerance policy. The ACT data corroborates the facility's written policy and demonstrates implementation of training requirements applicable to volunteers and contractors. Documentation Review Documentation reviewed demonstrates that Ocean Tides provides PREA-related instruction to volunteers and contractors who have contact with residents. Training materials reviewed address reporting responsibilities, resident safety, professional conduct, and the facility's zero-tolerance policy. One completed volunteer questionnaire and one completed contractor questionnaire were reviewed. Both reflected PREA orientation and reporting knowledge appropriate to their duties. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.332(a). 115.332(b) Policy Review and Analysis This provision establishes the following requirement: the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with residents, but all volunteers and contractors who have contact with residents shall be notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Contractor questionnaire, Volunteer and contractor training records. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address volunteer and contractor training and establish the expected practice applicable to 115.332(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed volunteer and contractor training records, acknowledgement forms, and ACT responses applicable to this provision. ACT responses indicate that volunteers and contractors are informed how to report allegations of sexual abuse and sexual harassment and that documentation is maintained verifying completion of required training. The ACT data corroborates the facility's documentation practices and demonstrates implementation of training verification procedures. Documentation Review Documentation reviewed demonstrates that Ocean Tides maintains records

documenting completion of required PREA training by volunteers and contractors. The documentation reviewed supports accountability and verification of training participation.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.332(b).

115.332(c)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall maintain documentation confirming that volunteers and contractors understand the training they have received. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Contractor questionnaire, Volunteer and contractor training records. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address volunteer and contractor training and establish the expected practice applicable to 115.332(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Ocean Tides ACT/PAQ response for Standard 115.332 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof.

Documentation Review

Relevant evidence included One completed volunteer questionnaire, One completed contractor questionnaire, Training acknowledgments.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.332(c).

Auditor Analysis and Determination

Volunteer and contractor questionnaires and available training documentation demonstrated that individuals with resident contact receive PREA information appropriate to their duties and understand reporting obligations. The completed counts were separately reconciled and no gap was identified.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.332.

Standard Finding

Meets Standard

115.333	Resident education
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Standard 115.333 - Resident education Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Resident Handbook. - Resident Orientation Materials. - PREA Educational Materials. - Resident Acknowledgement Forms. - Resident PREA education materials and acknowledgments. - Six completed random youth interviews. - Four completed targeted youth interviews. - Onsite education and signage verification. - Ocean Tides ACT/PAQ responses for Standard 115.333. - Resident Handbook - English- and Spanish-language PREA education materials - Twenty youth PREA education acknowledgments - Six random and four targeted youth interviews - Facility tour and posted materials Provision Analysis 115.333(a) Policy Review and Analysis This provision establishes the following requirement: during the intake process, residents shall receive information explaining, in an age appropriate fashion, the agency's zero tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Resident Handbook. The written requirements were treated as the agency's expected practice and were tested against records,

	interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "During the intake process youth shall receive information explaining the agency's zero tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment." This policy establishes the facility's requirement that residents receive PREA information immediately upon admission. The policy ensures residents are informed of their rights, reporting options, and available protections at the earliest stage of confinement. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, Resident Handbook, orientation materials, educational materials, and ACT responses applicable to this provision. ACT responses indicate that residents receive PREA information upon admission. The ACT data corroborates the facility's written policy and demonstrates implementation of resident orientation requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides provides residents with PREA information during admission and orientation. The Resident Handbook and orientation materials reviewed by the Auditor include information regarding resident rights, reporting procedures, and available services. Six random and four targeted youth interviews confirmed receipt of PREA information, multiple reporting routes, and outside-support information. Youth described ongoing reinforcement rather than a one-time intake presentation. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.333(a). 115.333(b) Policy Review and Analysis This provision establishes the following requirement: within 10 days of intake, the agency shall provide comprehensive age- appropriate education to residents either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Resident Handbook. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Within ten days of admission youth shall receive comprehensive age-appropriate education regarding their rights to be free from sexual abuse and sexual harassment, protection from retaliation, and reporting procedures." This policy requires the facility to provide comprehensive PREA education to residents shortly after

admission. The policy recognizes the importance of ensuring residents understand their rights, protections, and reporting options.

ACT/PAQ Review

The Auditor reviewed resident educational materials, acknowledgement forms, and ACT responses applicable to this provision. ACT responses indicate that residents receive comprehensive PREA education and that educational materials remain available throughout confinement. The ACT data corroborates the facility's written policy and demonstrates implementation of resident education requirements.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides provides age-appropriate PREA education addressing sexual abuse prevention, reporting methods, resident rights, and available services. Educational materials reviewed by the Auditor support implementation of these requirements.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.333(b).

115.333(c)

Policy Review and Analysis

This provision establishes the following requirement: current residents who have not received such education shall be educated within one year of the effective date of the PREA standards and shall receive education upon transfer to a different facility to the extent that the policies and procedures of the resident's new facility differ from those of the previous facility. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Resident Handbook. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address resident education and establish the expected practice applicable to 115.333(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Auditor reviewed resident educational materials, Resident Handbook, and ACT responses applicable to this provision. ACT responses indicate that PREA educational materials remain continuously available to residents. The ACT data corroborates the facility's educational practices and demonstrates ongoing access to PREA-related information.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides maintains PREA information in locations and formats accessible to residents. Educational materials

reviewed by the Auditor provide information regarding resident rights, reporting procedures, and available support services.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.333(c).

115.333(d)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall provide resident education in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to residents who have limited reading skills. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Resident Handbook. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address resident education and establish the expected practice applicable to 115.333(d). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Auditor reviewed resident educational materials, orientation records, and ACT responses applicable to this provision. ACT responses indicate that residents receive information regarding reporting methods and available services. The ACT data corroborates the facility's resident education practices and demonstrates implementation of educational requirements consistent with this provision.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides has established procedures intended to ensure all residents receive PREA-related information regardless of individual communication needs. Educational materials and orientation procedures support resident understanding of PREA protections and reporting options.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.333(d).

115.333(e)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall maintain documentation of resident participation in these education sessions. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Resident Handbook. The written requirements were treated as

	the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.333 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review Education materials, acknowledgments, and youth interviews demonstrated delivery in accessible formats and ongoing access to PREA information throughout placement. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.333(e). 115.333(f) Policy Review and Analysis This provision establishes the following requirement: in addition to providing such education, the agency shall ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Resident Handbook. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.333 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review Education materials, acknowledgments, and youth interviews demonstrated delivery in accessible formats and ongoing access to PREA information throughout placement. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.333(f). Auditor Analysis and Determination

	Twenty youth education acknowledgments, English- and Spanish-language materials, intake procedures, posted information, and six random plus four targeted youth interviews demonstrated that education is delivered at intake and reinforced during placement. Youth consistently identified multiple reporting options, outside support, privacy protections, and the ability to seek staff help. The repeated, accessible education and demonstrated understanding materially exceed simple one-time delivery. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus exceeds the requirements of Standard 115.333. Standard Finding Exceeds Standard

115.334	**Specialized training: Investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.334 - Specialized training: Investigations Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Investigator Training Records. - Specialized Investigator Training Curriculum. - Investigation Procedures. - Specialized investigator training certificate. - RSAS-057 questionnaire tracking certification. - Ocean Tides ACT/PAQ responses for Standard 115.334. - Specialized investigator training certificate - Investigation questionnaire and onsite verification - Audit-period investigation record - RSAS-106 Exit Meeting Agenda for Ocean Tides Provision Analysis

115.334(a)

Policy Review and Analysis

This provision establishes the following requirement: in addition to the general training provided to all employees pursuant to § 115.331, the agency shall ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Investigations shall be conducted by investigators who have received specialized training in conducting sexual abuse investigations in confinement settings." This policy establishes the facility's expectation that investigators assigned to sexual abuse investigations possess the specialized knowledge and skills necessary to conduct thorough and professional investigations. The policy recognizes that allegations of sexual abuse require specialized investigative techniques, knowledge of evidence preservation, and an understanding of the unique needs of youth involved in investigations.

ACT/PAQ Review

The Auditor reviewed the Ocean Tides PREA Compliance Policy, investigator training materials, training records, investigation procedures, and ACT responses applicable to this provision. ACT responses indicate that investigators receive specialized training related to sexual abuse investigations and that the training includes interviewing juvenile victims, evidence collection, and applicable legal requirements. The ACT data corroborates the facility's written policy and demonstrates implementation of specialized investigator training requirements. Based on the evidence reviewed, Ocean Tides has established procedures intended to ensure investigations are conducted by appropriately trained personnel.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides requires investigators to complete specialized PREA-related training prior to conducting sexual abuse investigations. Training materials reviewed by the Auditor address investigative responsibilities, interviewing techniques, evidence collection, evidence preservation, and documentation requirements. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.334(a).

115.334(b)

	Policy Review and Analysis This provision establishes the following requirement: specialized training shall include techniques for interviewing juvenile 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. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address specialized training: investigations and establish the expected practice applicable to 115.334(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed investigator training records, training curriculum, and ACT responses applicable to this provision. ACT responses indicate that investigators receive training regarding interviewing juvenile victims, proper use of Miranda and Garrity warnings when applicable, evidence collection, and evidence preservation. The ACT data corroborates the training materials reviewed by the Auditor and demonstrates implementation of specialized training requirements. Based on the evidence reviewed, Ocean Tides has established training practices consistent with the requirements of this provision. Documentation Review Documentation reviewed demonstrates that Ocean Tides maintains records documenting completion of specialized investigator training. The records reviewed provide evidence that investigators receive instruction regarding topics related to sexual abuse investigations in juvenile facilities. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.334(b). 115.334(c) Policy Review and Analysis This provision establishes the following requirement: the agency shall maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation

Procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address specialized training: investigations and establish the expected practice applicable to 115.334(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Auditor reviewed investigator training records and ACT responses applicable to this provision. ACT responses indicate that documentation of specialized investigator training is maintained by the facility. The ACT data corroborates the facility's recordkeeping practices and demonstrates implementation of documentation requirements associated with investigator training.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides maintains documentation verifying completion of specialized investigator training. Training records reviewed by the Auditor support accountability and verification of investigator qualifications. RSAS-057 certifies that one investigative-staff questionnaire was completed and uploaded on July 15, 2026. The completed Exit Meeting Agenda confirms that 17 specialized questionnaires were received and that the onsite investigation review identified no issue or concern.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.334(c).

115.334(d)

Policy Review and Analysis

This provision establishes the following requirement: any State entity or Department of Justice component that investigates sexual abuse in juvenile confinement settings shall provide such training to its agents and investigators who conduct such investigations. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation.

ACT/PAQ Review

The ACT/PAQ response for Standard 115.334 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation.

Documentation Review

	The specialized investigator training certificate and onsite review supported the investigator qualification and documentation requirements. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.334(d). Auditor Analysis and Determination The investigator training certificate, specialized questionnaire, investigation procedures, and onsite review of the single audit-period investigation demonstrated that the individual responsible for the administrative investigation had PREA-specific training and used a documented process. The Exit Meeting Agenda records no issue or concern after onsite review. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.334. Standard Finding Meets Standard

115.335	**Specialized training: Medical and mental health care**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.335 - Specialized training: Medical and mental health care Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Medical and Mental Health Training Records. - Specialized Medical and Mental Health Training Materials. - Medical and Mental Health Procedures. - Medical and mental-health staff questionnaires. - Training records. - Ocean Tides ACT/PAQ responses for Standard 115.335.

- Medical and mental-health staff questionnaires

- Medical and mental-health training records

- Medical Services Policy

Provision Analysis

115.335(a)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in:(1) How to detect and assess signs of sexual abuse and sexual harassment;(2) How to preserve physical evidence of sexual abuse;(3) How to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment; and(4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical and Mental Health Procedures., Medical Services Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Medical and mental health practitioners who work regularly in the facility shall receive specialized training related to sexual abuse and sexual harassment in confinement settings." This policy establishes the facility's expectation that medical and mental health practitioners possess specialized knowledge regarding sexual abuse and sexual harassment involving confined youth. The policy recognizes the critical role medical and mental health professionals play in identifying, responding to, and supporting victims of sexual abuse.

ACT/PAQ Review

The Auditor reviewed the Ocean Tides PREA Compliance Policy, medical and mental health training materials, training records, procedures, and ACT responses applicable to this provision. ACT responses indicate that medical and mental health practitioners receive specialized PREA training. The ACT data corroborates the facility's written policy and demonstrates implementation of specialized training requirements applicable to medical and mental health personnel. Based on the evidence reviewed, Ocean Tides has established training procedures intended to ensure practitioners possess the knowledge necessary to fulfill their responsibilities under PREA.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides provides specialized PREA-related instruction to medical and mental health practitioners. Training materials reviewed by the Auditor address victim response, evidence preservation, assessment techniques, reporting requirements, and trauma-informed care

practices.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.335(a).

115.335(b)

Policy Review and Analysis

This provision establishes the following requirement: if medical staff employed by the agency conduct forensic examinations, such medical staff shall receive the appropriate training to conduct such examinations. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical and Mental Health Procedures., Medical Services Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address specialized training: medical and mental health care and establish the expected practice applicable to 115.335(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Auditor reviewed medical and mental health training materials, training records, and ACT responses applicable to this provision. ACT responses indicate that specialized training includes detecting and assessing signs of sexual abuse and sexual harassment, preserving evidence when appropriate, and responding effectively and professionally to victims. The ACT data corroborates the training materials reviewed by the Auditor and demonstrates implementation of specialized training requirements consistent with this provision.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides provides specialized instruction regarding the detection and assessment of sexual abuse and sexual harassment, preservation of evidence when appropriate, and professional responses to victims. Training materials reviewed by the Auditor support the facility's efforts to ensure practitioners are prepared to address allegations of sexual abuse involving residents.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.335(b).

115.335(c)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere. Ocean

	Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical and Mental Health Procedures., Medical Services Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address specialized training: medical and mental health care and establish the expected practice applicable to 115.335(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed medical and mental health procedures, training materials, and ACT responses applicable to this provision. ACT responses indicate that medical and mental health practitioners receive specialized training regarding their responsibilities following allegations of sexual abuse and sexual harassment. The ACT data corroborates the facility's procedures and demonstrates implementation of practices consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures governing the role of medical and mental health practitioners in responding to allegations of sexual abuse and sexual harassment. The documentation reviewed supports coordination between treatment staff, investigators, and facility administration when allegations occur. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.335(c). 115.335(d) Policy Review and Analysis This provision establishes the following requirement: medical and mental health care practitioners shall also receive the training mandated for employees under § 115.331 or for contractors and volunteers under § 115.332, depending upon the practitioner's status at the agency. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical and Mental Health Procedures., Medical Services Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address specialized training: medical and mental health care and establish the expected practice applicable to 115.335(d). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed training records, training documentation, and ACT responses

	applicable to this provision. ACT responses indicate that documentation of specialized training is maintained by the facility. The ACT data corroborates the facility's recordkeeping practices and demonstrates implementation of documentation requirements associated with specialized training for medical and mental health practitioner Documentation Review Documentation reviewed demonstrates that Ocean Tides maintains records documenting completion of specialized PREA training by medical and mental health practitioners. The records reviewed support accountability and verification of training participation. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.335(d). Auditor Analysis and Determination Medical and mental-health questionnaires, training records, and policy demonstrated that clinical staff understand detection, reporting, evidence-preservation limits, trauma-informed response, and referral responsibilities. No contradictory evidence was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.335. Standard Finding Meets Standard

115.341	**Obtaining information from residents**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.341 - Obtaining information from residents Evidence Reviewed - Ocean Tides PREA Compliance Policy. - PREA Screening Tool. - Resident Intake Procedures. - Classification and Housing Documentation. - Twenty-one initial risk-screening records.

- Zero reassessments reported.

- Intake and risk-screening questionnaires.

- Targeted youth interviews.

- Ocean Tides ACT/PAQ responses for Standard 115.341.

- Twenty-one initial vulnerability assessments

- Resident assessment-date list

- Reassessment memorandum

- Intake and screening staff questionnaire

- Targeted youth interviews

Provision Analysis

115.341(a)

Policy Review and Analysis

This provision establishes the following requirement: within 72 hours of the resident's arrival at the facility and periodically throughout a resident's confinement, the agency shall obtain and use information about each resident's personal history and behavior to reduce the risk of sexual abuse by or upon a resident. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Intake Procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "All youth shall be assessed during intake screening and upon transfer to another facility for their risk of being sexually abused by other youth or sexually abusive toward other youth." This policy establishes the facility's requirement that residents be screened for risk factors associated with sexual victimization and abusiveness. The policy recognizes the importance of identifying risk factors early in a resident's placement to support safety, supervision, and individualized decision-making.

ACT/PAQ Review

The Auditor reviewed the Ocean Tides PREA Compliance Policy, PREA Screening Tool, intake procedures, classification documentation, and ACT responses applicable to this provision. ACT responses indicate that all residents are screened for risk of sexual victimization and abusiveness and that screenings are completed within required timeframes. The ACT data corroborates the facility's written policy and demonstrates implementation of intake screening procedures consistent with PREA requirements.

Documentation Review

	Documentation reviewed demonstrates that Ocean Tides has established screening procedures that are incorporated into the intake process. The PREA Screening Tool reviewed by the Auditor includes criteria intended to identify risk factors associated with victimization and abusiveness. The documentation demonstrates that the facility has implemented a structured process designed to identify residents who may require additional supervision, services, or protective measures. The facility submitted 21 initial risk-screening records. Screening documentation and intake questionnaires were consistent with timely screening practices. Twenty-one initial screenings were reviewed, and no reassessment was due or triggered in the reviewed records. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.341(a). 115.341(b) Policy Review and Analysis This provision establishes the following requirement: such assessments shall be conducted using an objective screening instrument. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Intake Procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Intake screening shall ordinarily take place within seventy-two hours of arrival at the facility." This policy establishes the facility's expectation that risk screening occur promptly following admission to ensure resident safety and appropriate placement decisions. ACT/PAQ Review The Auditor reviewed the PREA Compliance Policy, intake procedures, screening documentation, and ACT responses applicable to this provision. ACT responses indicate that screenings are completed within required timeframes. The ACT data corroborates the facility's written procedures and demonstrates implementation of timely screening practices. Documentation Review Documentation reviewed demonstrates that Ocean Tides has incorporated PREA screening requirements into intake procedures and has established timelines intended to ensure residents are assessed shortly after arrival. The documentation supports timely identification of risk factors that may affect resident safety. Twenty-one initial screenings were reviewed, and no reassessment was due or triggered in the reviewed records. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.341(b). 115.341(c)

	Policy Review and Analysis This provision establishes the following requirement: at a minimum, the agency shall attempt to ascertain information about, including the enumerated elements stated in the provision. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Intake Procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "The intake screening shall consider, at a minimum, the following criteria..." The policy then identifies multiple risk factors related to sexual victimization and abusiveness. This policy establishes the facility's requirement that screening decisions be based upon objective criteria designed to identify residents who may be vulnerable to victimization or who may present a risk of abusiveness toward others. ACT/PAQ Review The Auditor reviewed the PREA Compliance Policy, PREA Screening Tool, and ACT responses applicable to this provision. ACT responses indicate that screening information is collected and utilized in accordance with facility procedures. The ACT data corroborates the facility's screening practices and demonstrates implementation of objective screening criteria. Documentation Review Documentation reviewed demonstrates that Ocean Tides utilizes a screening instrument containing criteria consistent with PREA requirements. The screening process is designed to support informed decisions regarding resident safety and supervision needs. Twenty-one initial screenings were reviewed, and no reassessment was due or triggered in the reviewed records. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.341(c). 115.341(d) Policy Review and Analysis This provision establishes the following requirement: this information shall be ascertained through conversations with the resident during the intake process and medical and mental health screenings; during classification assessments; and by reviewing court records, case files, facility behavioral records, and other relevant documentation from the resident's files. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Intake Procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address screening for risk of

victimization and abusiveness and establish the expected practice applicable to 115.341(d). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Auditor reviewed screening procedures, resident records, and ACT responses applicable to this provision. ACT responses indicate that screening information is gathered through multiple sources and incorporated into the facility's assessment process. The ACT data corroborates the facility's procedures and demonstrates implementation of comprehensive screening practices.

Documentation Review

Documentation reviewed demonstrates that screening information is obtained through interviews, record reviews, referral information, and other available sources. The facility's procedures support collection of information necessary to evaluate resident risk factors and safety needs. Twenty-one initial screenings were reviewed, and no reassessment was due or triggered in the reviewed records.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.341(d).

115.341(e)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall implement appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Intake Procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy requires ongoing assessment of residents when additional information becomes available that may affect risk determinations.

ACT/PAQ Review

The Auditor reviewed the PREA Compliance Policy, screening documentation, and ACT responses applicable to this provision. ACT responses indicate that reassessments are conducted as required. The ACT data corroborates the facility's written procedures and demonstrates implementation of reassessment practices consistent with PREA requirements.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides has established

	procedures for updating and reassessing screening information when circumstances warrant additional review. These procedures support continued evaluation of resident safety needs throughout placement. Zero reassessments were reported. No reviewed record or interview identified a referral, request, incident, or new information that required reassessment during the sampled records. Twenty-one initial screenings were reviewed, and no reassessment was due or triggered in the reviewed records. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.341(e). Auditor Analysis and Determination Twenty-one initial screenings were reviewed. Zero reassessments were reported. The reassessment memorandum, admission and assessment information, intake procedures, and staff responses supported that no reviewed youth had reached a policy-defined reassessment point or presented new information requiring an additional screening during the audit period. Screening information was protected from unnecessary dissemination. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.341. Standard Finding Meets Standard

115.342	**Placement of residents**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.342 - Placement of residents Evidence Reviewed - Ocean Tides PREA Compliance Policy. - PREA Screening Tool. - Classification Documentation. - Housing Assignment Records. - Use-of-screening documentation.

	- Housing and classification records. - Targeted youth interviews. - Onsite verification of one dorm and private bedrooms. - Ocean Tides ACT/PAQ responses for Standard 115.342. - Vulnerability assessments and housing records - Use-of-screening memorandum - Facility tour and housing observations - Classification questionnaire Provision Analysis 115.342(a) Policy Review and Analysis This provision establishes the following requirement: the agency shall use all information obtained pursuant to § 115.341 and subsequently to make housing, bed, program, education, and work assignments for residents with the goal of keeping all residents safe and free from sexual abuse. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Information obtained from the risk screening shall be used to inform housing, bed, program, education, and supervision assignments." This policy establishes the facility's requirement that screening information be incorporated into operational decisions affecting resident placement and supervision. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, PREA Screening Tool, classification documentation, and ACT responses applicable to this provision. ACT responses indicate that screening information is used when making housing, bed, program, education, and work assignment decisions when applicable. The ACT data corroborates the facility's written policy and demonstrates implementation of individualized placement practices. Documentation Review Documentation reviewed demonstrates that Ocean Tides utilizes screening information to support individualized decisions regarding resident management and safety. Classification and placement documentation reviewed by the Auditor supports implementation of this requirement.

	Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.342(a). 115.342(b) Policy Review and Analysis This provision establishes the following requirement: residents may be isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other residents safe, and then only until an alternative means of keeping all residents safe can be arranged. During any period of isolation, agencies shall not deny residents daily large-muscle exercise and any legally required educational programming or special education services. Residents in isolation shall receive daily visits from a medical or mental health care clinician. Residents shall also have access to other programs and work opportunities to the extent possible. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address use of screening information and establish the expected practice applicable to 115.342(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed classification procedures, housing assignment documentation, and ACT responses applicable to this provision. ACT responses indicate that placement decisions are made on an individualized basis. The ACT data corroborates the facility's classification practices and demonstrates implementation of individualized placement procedures consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides considers resident risk factors, safety concerns, and individual needs when making placement decisions. These procedures support efforts to separate residents who may be vulnerable to victimization from residents who may present a risk of abusiveness. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.342(b). 115.342(c) Policy Review and Analysis This provision is no longer applicable to your compliance finding. ACT/PAQ Review This subsection was excluded from the facility compliance determination under the current DOJ audit instructions. ACT/PAQ information was not used to create a

	separate implementation finding for this subsection. Documentation Review No separate facility implementation determination was made for this subsection. The subsection was handled using the same exclusion language used in the current production model. This subsection was excluded from the compliance determination for Standard 115.342. 115.342(d) Policy Review and Analysis This provision is no longer applicable to your compliance finding. ACT/PAQ Review This subsection was excluded from the facility compliance determination under the current DOJ audit instructions. ACT/PAQ information was not used to create a separate implementation finding for this subsection. Documentation Review No separate facility implementation determination was made for this subsection. The subsection was handled using the same exclusion language used in the current production model. This subsection was excluded from the compliance determination for Standard 115.342. 115.342(e) Policy Review and Analysis This provision is no longer applicable to your compliance finding. ACT/PAQ Review This subsection was excluded from the facility compliance determination under the current DOJ audit instructions. ACT/PAQ information was not used to create a separate implementation finding for this subsection. Documentation Review No separate facility implementation determination was made for this subsection. The subsection was handled using the same exclusion language used in the current production model. This subsection was excluded from the compliance determination for Standard 115.342.

	115.342(f) Policy Review and Analysis This provision is no longer applicable to your compliance finding. ACT/PAQ Review This subsection was excluded from the facility compliance determination under the current DOJ audit instructions. ACT/PAQ information was not used to create a separate implementation finding for this subsection. Documentation Review No separate facility implementation determination was made for this subsection. The subsection was handled using the same exclusion language used in the current production model. This subsection was excluded from the compliance determination for Standard 115.342. 115.342(g) Policy Review and Analysis This provision is no longer applicable to your compliance finding. ACT/PAQ Review This subsection was excluded from the facility compliance determination under the current DOJ audit instructions. ACT/PAQ information was not used to create a separate implementation finding for this subsection. Documentation Review No separate facility implementation determination was made for this subsection. The subsection was handled using the same exclusion language used in the current production model. This subsection was excluded from the compliance determination for Standard 115.342. 115.342(h) Policy Review and Analysis This provision establishes the following requirement: if a resident is isolated pursuant to paragraph (b) of this section, the facility shall clearly document: (1) The basis for the facility's concern for the resident's safety; and (2) The reason why no alternative means of separation can be arranged. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy.. The written requirements were treated as the agency's expected practice and were tested

against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation.

ACT/PAQ Review

The ACT/PAQ response for Standard 115.342 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation.

Documentation Review

Housing and programming decisions were individualized. Onsite observation confirmed private bedrooms, continued access to ordinary programming, and no isolation unit.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.342(h).

115.342(i)

Policy Review and Analysis

This provision establishes the following requirement: every 30 days, the facility shall afford each resident described in paragraph (h) of this section a review to determine whether there is a continuing need for separation from the general population. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation.

ACT/PAQ Review

The ACT/PAQ response for Standard 115.342 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation.

Documentation Review

Housing and programming decisions were individualized. Onsite observation confirmed private bedrooms, continued access to ordinary programming, and no isolation unit.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.342(i).

Auditor Analysis and Determination

Screening and housing records, staff questionnaires, and onsite observation demonstrated individualized use of risk information for housing, supervision,

	education, and programming. Ocean Tides operates one dormitory arrangement with private bedrooms and no isolation unit. No automatic placement based solely on identity or status was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.342. Standard Finding Meets Standard

115.351	**Resident reporting**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.351 - Resident reporting Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Resident Handbook. - Resident Orientation Materials. - Reporting Procedures. - Reporting posters and handbook materials. - Onsite live testing of internal, external, anonymous, and third-party reporting routes. - Youth and staff interviews. - Ocean Tides ACT/PAQ responses for Standard 115.351. - PREA reporting materials and posters - Confidential Phone Call Procedure - Resident Telephone Policy - Staff and youth interviews - Live testing of reporting methods Provision Analysis 115.351(a)

	Policy Review and Analysis This provision establishes the following requirement: the agency shall provide multiple internal ways for residents to privately report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Reporting Procedures., Reporting posters and handbook materials.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Residents may report sexual abuse, sexual harassment, retaliation, or staff neglect through multiple methods including verbal reports, written reports, grievances, and reports to outside entities." This policy establishes multiple reporting avenues and ensures residents have access to reporting methods that support timely disclosure of sexual abuse, sexual harassment, retaliation, and staff misconduct. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, Resident Handbook, reporting procedures, and ACT responses applicable to this provision. ACT responses indicate that multiple internal and external reporting methods are available to residents. The ACT data corroborates the facility's written policy and demonstrates implementation of reporting procedures consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides provides residents with information regarding available reporting options through orientation materials, educational materials, and the Resident Handbook. The documentation reviewed supports implementation of accessible reporting procedures. The auditor tested internal, external, anonymous, third-party, staff-private, and no-PIN telephone reporting methods onsite. Available methods functioned as described, and youth could identify multiple options. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.351(a). 115.351(b) Policy Review and Analysis This provision establishes the following requirement: the agency shall also provide at least one way for residents to report abuse or harassment to a public or private entity or office that is not part of the agency and that 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 detained solely for civil immigration purposes shall be provided

	information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Reporting Procedures., Reporting posters and handbook materials.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address resident reporting and establish the expected practice applicable to 115.351(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed reporting procedures, resident materials, and ACT responses applicable to this provision. ACT responses indicate that external reporting methods are available to residents. The ACT data corroborates the facility's reporting procedures and demonstrates implementation of reporting options consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides provides residents with access to methods of reporting allegations to entities that are not part of the facility's administration. This reporting options support confidentiality and provides residents with alternatives when reporting concerns. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.351(b). 115.351(c) Policy Review and Analysis This provision establishes the following requirement: staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Reporting Procedures., Reporting posters and handbook materials. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address resident reporting and establish the expected practice applicable to 115.351(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed reporting procedures, resident materials, and ACT responses applicable to this provision. ACT responses indicate that staff accept reports made verbally, in writing, anonymously, and from third parties. The ACT data corroborates

	the facility's written procedures and demonstrates implementation of reporting practices designed to encourage disclosure of sexual abuse and sexual harassment. Documentation Review Documentation reviewed demonstrates that Ocean Tides allows reports to be made verbally, in writing, anonymously, and through third parties. These procedures provide flexibility and encourage reporting regardless of the reporting method selected. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.351(c). 115.351(d) Policy Review and Analysis This provision establishes the following requirement: the facility shall provide residents with access to tools necessary to make a written report. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Reporting Procedures., Reporting posters and handbook materials.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address resident reporting and establish the expected practice applicable to 115.351(d). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.351 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Reporting posters and handbook materials, Onsite live testing of internal, external, anonymous, and third-party reporting routes, Youth and staff interviews. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.351(d). 115.351(e) Policy Review and Analysis This provision establishes the following requirement: the agency shall provide a method for staff to privately report sexual abuse and sexual harassment of residents. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Reporting Procedures., Reporting

	posters and handbook materials. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.351 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review Youth and staff interviews and live testing supported immediate acceptance and forwarding of reports through multiple channels. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.351(e). Auditor Analysis and Determination Policy, posters, resident materials, the confidential phone procedure, staff and youth interviews, and live testing demonstrated multiple internal and external reporting methods. Youth could report verbally, in writing, through staff, through third parties, and through outside channels. Staff understood that all reports must be accepted and forwarded immediately. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.351. Standard Finding Meets Standard

115.352	**Exhaustion of administrative remedies**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.352 - Exhaustion of administrative remedies Evidence Reviewed - Ocean Tides PREA Compliance Policy.

	- Resident Grievance Policy. - Resident Handbook. - Grievance policy and records. - Data Collection Part One showing zero PREA-related grievances. - Ocean Tides ACT/PAQ responses for Standard 115.352. - Client Grievance Policy - Resident Handbook - Youth interviews - Grievance records for the review period Provision Analysis 115.352(a) Policy Review and Analysis This provision establishes the following requirement: an agency shall be exempt from this standard if it does not have administrative procedures to address resident grievances regarding sexual abuse. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Grievance Policy., Resident Handbook., Grievance policy and records.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Youth may submit a grievance alleging sexual abuse at any time regardless of when the incident is alleged to have occurred." This policy establishes that residents are not prohibited from reporting sexual abuse through the grievance process based on the age of the allegation. The policy supports resident access to reporting mechanisms and reinforces the facility's commitment to ensuring allegations of sexual abuse receive review regardless of when they are disclosed. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, Resident Grievance Policy, Resident Handbook, and ACT responses applicable to this provision. ACT responses indicate there is no time limit on when a resident may submit a grievance alleging sexual abuse. The ACT data corroborates the facility's written policy and demonstrates implementation of grievance procedures consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established grievance

	procedures that allow residents to report allegations of sexual abuse through formal complaint processes. The Resident Handbook provides residents with information regarding grievance procedures and reporting options available within the facility. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.352(a). 115.352(b) Policy Review and Analysis This provision establishes the following requirement: (1) The agency shall not impose a time limit on when a resident may submit a grievance regarding an allegation of sexual abuse. (2) The agency may apply otherwise- applicable time limits on any portion of a grievance that does not allege an incident of sexual abuse. (3) The agency 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. (4) Nothing in this section shall restrict the agency's ability to defend against a lawsuit filed by a resident on the ground that the applicable statute of limitations has expired. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Grievance Policy., Resident Handbook., Grievance policy and records.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Residents shall not be required to use any informal grievance process or otherwise attempt to resolve with staff an alleged incident of sexual abuse." This policy ensures residents may immediately report allegations of sexual abuse without first attempting informal resolution. The policy recognizes the seriousness of sexual abuse allegations and removes barriers that could discourage reporting. ACT/PAQ Review The Auditor reviewed the PREA Compliance Policy, grievance procedures, and ACT responses applicable to this provision. ACT responses indicate residents are not required to attempt informal resolution prior to submitting a grievance regarding sexual abuse. The ACT data corroborates the facility's written procedures and demonstrates implementation of practices consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established grievance procedures that permit direct reporting of sexual abuse allegations through formal channels. The documentation supports resident access to reporting mechanisms without requiring prior attempts at informal resolution. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.352(b). 115.352(c)

	Policy Review and Analysis This provision establishes the following requirement: the agency shall ensure that (1) 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 (2) Such grievance is not referred to a staff member who is the subject of the complaint. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Grievance Policy., Resident Handbook., Grievance policy and records.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address exhaustion of administrative remedies and establish the expected practice applicable to 115.352(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed grievance procedures, Resident Handbook provisions, and ACT responses applicable to this provision. ACT responses indicate residents may submit grievances alleging sexual abuse and that the facility accepts and reviews such grievances in accordance with established procedures. The ACT data corroborates the facility's grievance practices and demonstrates implementation of procedures intended to support resident reporting. Documentation Review Documentation reviewed demonstrates that Ocean Tides allows residents to utilize grievance procedures when reporting allegations of sexual abuse and provides information regarding the process through resident educational materials and the Resident Handbook. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.352(c). 115.352(d) Policy Review and Analysis This provision establishes the following requirement: (1) The agency shall issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance. (2) Computation of the 90-day time period shall not include time consumed by residents in preparing any administrative appeal. (3) The agency may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The agency shall notify the resident in writing of any such extension and provide a date by which a decision will be made. and the remaining elements stated in the provision. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Grievance Policy., Resident Handbook., Grievance policy and records.. The written requirements were treated as

	the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Emergency grievances alleging that a resident is subject to a substantial risk of imminent sexual abuse shall receive immediate attention and response." This policy establishes procedures for responding to emergency grievances involving allegations that a resident faces an immediate threat of sexual abuse. The policy supports prompt intervention when resident safety may be at risk. ACT/PAQ Review The Auditor reviewed grievance procedures, emergency reporting procedures, and ACT responses applicable to this provision. ACT responses indicate emergency grievances alleging substantial risk of imminent sexual abuse receive immediate review. The ACT data corroborates the facility's written procedures and demonstrates implementation of emergency response requirements consistent with PREA standards. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures requiring expedited review of emergency grievances and immediate action when necessary to protect resident safety. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.352(d). 115.352(e) Policy Review and Analysis This provision establishes the following requirement: (1) 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. and the remaining elements stated in the provision. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Grievance Policy., Resident Handbook., Grievance policy and records.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address exhaustion of administrative remedies and establish the expected practice applicable to 115.352(e). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed grievance procedures and ACT responses applicable to this provision. ACT responses indicate the facility processes grievances alleging sexual

	abuse in accordance with established procedures and maintains documentation regarding grievance reviews and responses. The ACT data corroborates the facility's grievance management practices. Documentation Review Documentation reviewed demonstrates that Ocean Tides maintains procedures governing responses to grievances alleging sexual abuse and requires appropriate review and documentation of grievance outcomes. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.352(e). 115.352(f) Policy Review and Analysis This provision establishes the following requirement: (1) The agency shall establish procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse. (2) After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, the agency shall immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken, shall provide an initial response within 48 hours, and shall issue a final agency decision within 5 calendar days. and the remaining elements stated in the provision. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Grievance Policy., Resident Handbook., Grievance policy and records.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address exhaustion of administrative remedies and establish the expected practice applicable to 115.352(f). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed grievance procedures, PREA reporting procedures, and ACT responses applicable to this provision. ACT responses indicate residents have access to grievance procedures for reporting allegations of sexual abuse and that reports are addressed in accordance with established policy. The ACT data corroborates the facility's procedures and demonstrates implementation of reporting protections. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures intended to ensure residents are protected from retaliation for submitting grievances alleging sexual abuse or sexual harassment. These procedures support resident access to reporting mechanisms without fear of adverse consequences.

	Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.352(f). 115.352(g) Policy Review and Analysis This provision establishes the following requirement: the agency may discipline a resident for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the resident filed the grievance in bad faith. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Grievance Policy., Resident Handbook., Grievance policy and records.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.352 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The grievance policy includes emergency procedures and does not impose barriers inconsistent with PREA. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.352(g). Auditor Analysis and Determination The grievance policy and resident materials permit sexual-abuse grievances without restrictive time limits or informal-resolution barriers and provide for emergency review. No PREA grievance in the review period revealed an implementation problem. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.352. Standard Finding Meets Standard

115.353	**Resident access to outside confidential support services and legal representation**

	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.353 - Resident access to outside confidential support services and legal representation Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Resident Handbook. - Community Resource Information. - Victim Advocacy Resource Materials. - DayOne_OceanTidesMOU_2026.pdf. - Youth interviews and onsite access verification. - Ocean Tides ACT/PAQ responses for Standard 115.353. - Signed 2026 Day One MOU - Outside support posters and youth materials - Confidential Phone Call Procedure - Youth interviews and live testing Provision Analysis 115.353(a) Policy Review and Analysis This provision establishes the following requirement: the facility shall provide residents with access to outside victim advocates for emotional support services related to sexual abuse, by providing, posting, or otherwise making accessible mailing addresses and telephone numbers, including toll free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations, and, for persons detained solely for civil immigration purposes, immigrant services agencies. The facility shall enable reasonable communication between residents and these organizations and agencies, in as confidential a manner as possible. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., DayOne_OceanTidesMOU_2026.pdf., Signed 2026 Day One MOU. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Residents shall be provided access to outside victim advocates for

	emotional support services related to sexual abuse." This policy establishes the facility's commitment to providing residents with access to outside support services following allegations of sexual abuse. The policy recognizes the importance of victim advocacy and emotional support as part of a comprehensive response to sexual abuse. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, Resident Handbook, victim advocacy information, community resource documentation, and ACT responses applicable to this provision. ACT responses indicate residents are provided access to outside victim advocates and support services. The ACT data corroborates the facility's written policy and demonstrates implementation of procedures intended to provide residents with access to emotional support resources. Documentation Review Documentation reviewed demonstrates that Ocean Tides maintains information regarding victim advocacy organizations and community resources available to residents. The Resident Handbook and educational materials reviewed by the Auditor include information regarding available support services and methods for accessing assistance. The current Day One MOU, contact materials, onsite testing, and youth interviews confirmed access to outside emotional support and victim-advocacy information. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.353(a). 115.353(b) Policy Review and Analysis This provision establishes the following requirement: the facility shall inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., DayOne_OceanTidesMOU_2026.pdf., Signed 2026 Day One MOU. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address resident access to outside confidential support services and establish the expected practice applicable to 115.353(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed resident educational materials, community resource

documentation, and ACT responses applicable to this provision. ACT responses indicate residents receive information regarding available advocacy services. The ACT data corroborates the facility's practices and demonstrates implementation of procedures intended to ensure residents are aware of available support resources.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides provides residents with information regarding available advocacy services and methods for contacting support providers. The documentation supports resident awareness of available resources and assistance.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.353(b).

115.353(c)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse. The agency shall maintain copies of agreements or documentation showing attempts to enter into such agreements. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., DayOne_OceanTidesMOU_2026.pdf., Signed 2026 Day One MOU. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address resident access to outside confidential support services and establish the expected practice applicable to 115.353(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Auditor reviewed resident educational materials, communication procedures, and ACT responses applicable to this provision. ACT responses indicate residents are informed of the extent to which communications with outside support providers may be monitored. The ACT data corroborates the facility's written procedures and demonstrates implementation of resident notification requirements.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides informs residents regarding the nature of communications with outside support providers and any limitations that may apply. These procedures support informed decision-making regarding the use of outside support services.

Based on the totality of the evidence, the Auditor determined that Ocean Tides

	School - Narragansett Campus meets the requirements of provision 115.353(c). 115.353(d) Policy Review and Analysis This provision establishes the following requirement: the facility shall also provide residents with reasonable and confidential access to their attorneys or other legal representation and reasonable access to parents or legal guardians. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., DayOne_OceanTidesMOU_2026.pdf., Signed 2026 Day One MOU. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.353 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The signed Day One MOU and confidential contact procedure documented outside support access and the agency's efforts to maintain those services. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.353(d). Auditor Analysis and Determination The signed 2026 Day One MOU, confidential phone procedure, posted information, youth interviews, and live testing demonstrated access to outside victim advocacy and confidential emotional support. Youth were informed of applicable confidentiality and mandatory-reporting limits. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.353. Standard Finding Meets Standard

115.354	**Third-party reporting**
	Auditor Overall Determination: Meets Standard

	Auditor Discussion
	Standard 115.354 - Third-party reporting Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Ocean Tides Website Information. - Resident Handbook. - Reporting Procedures. - Third-party reporting materials. - Website and posted reporting information. - Onsite live testing. - Ocean Tides ACT/PAQ responses for Standard 115.354. - Third-party reporting information - Public website and posted materials - Resident Handbook Provision Analysis 115.354(a) Policy Review and Analysis This provision establishes the following requirement: the agency shall establish a method to receive third-party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of a resident. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Handbook., Reporting Procedures., Resident Handbook. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Third parties, including family members, attorneys, advocates, and other individuals, may report allegations of sexual abuse and sexual harassment on behalf of a resident." This policy establishes the facility's commitment to allowing individuals other than residents to report allegations of sexual abuse and sexual harassment. The policy supports multiple reporting avenues and encourages reporting by individuals who may become aware of resident safety concerns. ACT/PAQ Review

	The Auditor reviewed the Ocean Tides PREA Compliance Policy, reporting procedures, website information, and ACT responses applicable to this provision. ACT responses indicate methods are available for third parties to report allegations of sexual abuse and sexual harassment and that information regarding third-party reporting is publicly available. The ACT data corroborates the facility's written policy and demonstrates implementation of procedures consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides provides information regarding third-party reporting through publicly available resources and reporting procedures. The documentation reviewed supports accessibility of reporting information to family members, advocates, and other interested parties. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.354(a). Auditor Analysis and Determination Public information, resident materials, and reporting procedures provided a method for third parties to report sexual abuse or sexual harassment on behalf of a resident. The method was available without requiring the resident to use the internal grievance system. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.354. Standard Finding Meets Standard

115.361	**Staff and agency reporting duties**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.361 - Staff and agency reporting duties Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Employee Handbook. - Mandatory Reporting Procedures. - Staff Training Curriculum.

- Twelve random staff interviews.

- Line/supervisory staff questionnaires.

- PREA reporting policy.

- Ocean Tides ACT/PAQ responses for Standard 115.361.

- Reporting and Responding to Alleged Abuse and Neglect Policy

- Confidentiality Policy

- Staff questionnaires and interviews

Provision Analysis

115.361(a)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency; retaliation against residents or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Employee Handbook., Mandatory Reporting Procedures., PREA reporting policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "All staff are required to immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment, retaliation, or staff neglect that may have contributed to an incident." This policy establishes mandatory reporting requirements for all employees and reinforces the facility's expectation that allegations and concerns involving sexual abuse or sexual harassment are immediately communicated through established reporting channels.

ACT/PAQ Review

The Auditor reviewed the Ocean Tides PREA Compliance Policy, staff training materials, reporting procedures, and ACT responses applicable to this provision. ACT responses indicate staff are required to immediately report any knowledge, suspicion, or information regarding sexual abuse, sexual harassment, retaliation, and staff neglect. The ACT data corroborates the facility's written policy and demonstrates implementation of mandatory reporting requirements throughout facility operations.

Documentation Review

	Documentation reviewed demonstrates that Ocean Tides incorporates reporting responsibilities into policy, employee training, and operational procedures. Staff training materials reviewed by the Auditor include instruction regarding mandatory reporting obligations and employee responsibilities when receiving information related to sexual abuse or sexual harassment. All 12 random staff interviewees described an immediate duty to report sexual abuse or sexual harassment and understood that they could not investigate the allegation themselves. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.361(a). 115.361(b) Policy Review and Analysis This provision establishes the following requirement: the agency shall also require all staff to comply with any applicable mandatory child abuse reporting laws. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Employee Handbook., Mandatory Reporting Procedures., PREA reporting policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Information concerning sexual abuse reports shall be limited to those individuals who need the information to make treatment, investigation, security, and management decisions." This policy establishes confidentiality protections governing PREA-related information and limits dissemination to individuals with a legitimate operational need for the information. ACT/PAQ Review The Auditor reviewed the PREA Compliance Policy, confidentiality procedures, and ACT responses applicable to this provision. ACT responses indicate information related to sexual abuse reports is shared only with individuals who have a need to know. The ACT data corroborates the facility's written procedures and demonstrates implementation of confidentiality requirements consistent with PREA standards. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures intended to protect the confidentiality of sexual abuse and sexual harassment reports while ensuring necessary information is available to support investigations, treatment decisions, and resident safety. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.361(b). 115.361(c) Policy Review and Analysis

This provision establishes the following requirement: apart from reporting to designated supervisors or officials and designated State or local services agencies, staff shall be prohibited from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Employee Handbook., Mandatory Reporting Procedures., PREA reporting policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy requires compliance with mandatory reporting laws applicable to allegations involving youth and other protected populations.

ACT/PAQ Review

The Auditor reviewed mandatory reporting procedures, staff training materials, and ACT responses applicable to this provision. ACT responses indicate mandatory reporting requirements are followed for residents under the age of 18 and other applicable vulnerable populations. The ACT data corroborates the facility's written procedures and demonstrates implementation of mandatory reporting requirements consistent with applicable laws and regulations.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides has established procedures requiring notification of appropriate authorities when allegations involve conduct subject to mandatory reporting requirements. Staff training materials reviewed by the Auditor reinforce employee responsibilities regarding mandatory reporting obligations.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.361(c).

115.361(d)

Policy Review and Analysis

This provision establishes the following requirement: (1) Medical and mental health practitioners shall be required to report sexual abuse to designated supervisors and officials pursuant to paragraph (a) of this section, as well as to the designated State or local services agency where required by mandatory reporting laws. (2) Such practitioners shall be required to inform residents at the initiation of services of their duty to report and the limitations of confidentiality. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Employee Handbook., Mandatory Reporting Procedures., PREA reporting policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address staff and agency reporting duties and

	establish the expected practice applicable to 115.361(d). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.361 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Twelve random staff interviews, Line/supervisory staff questionnaires, PREA reporting policy. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.361(d). 115.361(e) Policy Review and Analysis This provision establishes the following requirement: (1) Upon receiving any allegation of sexual abuse, the facility head or his or her designee shall promptly report the allegation to the appropriate agency office and to the alleged victim's parents or legal guardians, unless the facility has official documentation showing the parents or legal guardians should not be notified. (2) If the alleged victim is under the guardianship of the child welfare system, the report shall be made to the alleged victim's caseworker instead of the parents or legal guardians. and the remaining elements stated in the provision. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Employee Handbook., Mandatory Reporting Procedures., PREA reporting policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address staff and agency reporting duties and establish the expected practice applicable to 115.361(e). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.361 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Twelve random staff interviews, Line/supervisory staff questionnaires, PREA reporting policy. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.361(e).

	115.361(f) Policy Review and Analysis This provision establishes the following requirement: the facility shall report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Employee Handbook., Mandatory Reporting Procedures., PREA reporting policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.361 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review Staff understood mandatory reporting and confidentiality limits, including reporting involving a person under age 18. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.361(f). Auditor Analysis and Determination Written reporting and confidentiality rules were consistent with staff questionnaires and interviews. Staff understood immediate reporting duties, limits on disclosure, and the need to report information involving a person under 18 to the appropriate authorities. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.361. Standard Finding Meets Standard

115.362	**Agency protection duties**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Standard 115.362 - Agency protection duties

Evidence Reviewed

- Ocean Tides PREA Compliance Policy.

- Resident Protection Procedures.

- Incident Response Documentation.

- Leadership and staff interviews.

- Onsite protective-housing verification.

- Ocean Tides ACT/PAQ responses for Standard 115.362.

- Coordinated Response Plan

- Leadership and staff interviews

- Onsite observations

Provision Analysis

115.362(a)

Policy Review and Analysis

This provision establishes the following requirement: when an agency learns that a resident is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the resident. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Protection Procedures., Coordinated Response Plan. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "When an employee learns that a youth is subject to a substantial risk of imminent sexual abuse, immediate action shall be taken to protect the youth." This policy establishes the facility's obligation to respond immediately when information indicates a resident may face a substantial risk of imminent sexual abuse. The policy prioritizes resident safety and requires prompt intervention to reduce or eliminate identified risks.

ACT/PAQ Review

The Auditor reviewed the Ocean Tides PREA Compliance Policy, resident protection procedures, incident response documentation, and ACT responses applicable to this provision. ACT responses indicate immediate action is taken whenever a resident is determined to be subject to a substantial risk of imminent sexual abuse. The ACT data corroborates the facility's written policy and demonstrates implementation of protective measures designed to ensure resident safety.

	Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures for responding to safety concerns involving residents who may be vulnerable to sexual abuse. The procedures reviewed support timely intervention, supervisory review, and protective actions when circumstances indicate an immediate threat to resident safety. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.362(a). Auditor Analysis and Determination Leadership and staff interviews confirmed that immediate protective action would be taken whenever a resident faced a substantial risk of imminent sexual abuse. The facility's staffing model and private-bedroom configuration provide practical options for immediate separation and increased supervision. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.362. Standard Finding Meets Standard

115.363	**Reporting to other confinement facilities**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.363 - Reporting to other confinement facilities Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Reporting Procedures. - Notification Documentation. - Policy and external-notification procedures. - Specialized-role questionnaires. - Ocean Tides ACT/PAQ responses for Standard 115.363. - Reporting and notification procedures

	- Specialized staff questionnaires - Audit-period allegation record Provision Analysis 115.363(a) Policy Review and Analysis This provision establishes the following requirement: upon receiving an allegation that a resident was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred and shall also notify the appropriate investigative agency. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Reporting Procedures., Policy and external-notification procedures., Reporting and notification procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Upon receiving an allegation that a youth was sexually abused while confined at another facility, the facility head shall notify the head of the facility where the alleged abuse occurred." This policy establishes procedures governing allegations involving conduct that may have occurred at another confinement facility. The policy supports communication between facilities and promotes appropriate review of reported allegations. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, reporting procedures, notification documentation, and ACT responses applicable to this provision. ACT responses indicate allegations received involving abuse at another facility are reported to the appropriate facility head or office and that notifications are documented. The ACT data corroborates the facility's written procedures and demonstrates implementation of notification requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures for notifying other facilities when allegations are received involving conduct that may have occurred elsewhere. The documentation reviewed supports timely communication and documentation of notifications. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.363(a). 115.363(b) Policy Review and Analysis This provision establishes the following requirement: such notification shall be

	provided as soon as possible, but no later than 72 hours after receiving the allegation. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Reporting Procedures., Policy and external-notification procedures., Reporting and notification procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address reporting to other confinement facilities and establish the expected practice applicable to 115.363(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed notification procedures and ACT responses applicable to this provision. ACT responses indicate notifications are documented and maintained in accordance with facility procedures. The ACT data corroborates the facility's documentation practices and demonstrates implementation of notification requirements consistent with PREA standards. Documentation Review Documentation reviewed demonstrates that Ocean Tides maintains procedures requiring documentation of notifications and follow-up actions when allegations involve another confinement facility. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.363(b). 115.363(c) Policy Review and Analysis This provision establishes the following requirement: the agency shall document that it has provided such notification. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Reporting Procedures., Policy and external-notification procedures., Reporting and notification procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address reporting to other confinement facilities and establish the expected practice applicable to 115.363(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed reporting procedures, investigative documentation, and ACT responses applicable to this provision. ACT responses indicate allegations received from other facilities are investigated in accordance with PREA requirements. The ACT data corroborates the facility's procedures and demonstrates implementation of investigative requirements applicable to this provision.

	Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures requiring review and investigation of allegations received from other facilities when appropriate. These procedures support accountability and continuity in the handling of reported allegations. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.363(c). 115.363(d) Policy Review and Analysis This provision establishes the following requirement: the facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Reporting Procedures., Policy and external-notification procedures., Reporting and notification procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address reporting to other confinement facilities and establish the expected practice applicable to 115.363(d). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.363 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Policy and external-notification procedures, Specialized-role questionnaires. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.363(d). Auditor Analysis and Determination Policy and specialized staff responses established prompt notification to another confinement facility when an allegation involved conduct at that facility. The audit-period allegation did not require such a notification, and no contrary practice was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.363. Standard Finding

	Meets Standard

115.364	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.364 - Staff first responder duties Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Sexual Assault Coordinated Response Plan. - First Responder Training Materials. - Twelve random staff interviews. - First-responder questionnaires. - Coordinated Response Plan. - Ocean Tides ACT/PAQ responses for Standard 115.364. - Coordinated Response Plan - Employee PREA training records - Twelve random staff interviews Provision Analysis 115.364(a) Policy Review and Analysis This provision establishes the following requirement: upon learning of an allegation that a resident was sexually abused, the first staff member to respond to the report shall be required to, including the enumerated elements stated in the provision. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Coordinated Response Plan., Coordinated Response Plan. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "The first staff member to respond to a report of sexual abuse shall take immediate action to

protect the victim, separate involved parties, preserve evidence, and notify appropriate personnel." This policy establishes the responsibilities of staff who initially respond to allegations of sexual abuse. The policy emphasizes resident safety, evidence preservation, and timely notification of appropriate personnel.

ACT/PAQ Review

The Auditor reviewed the Ocean Tides PREA Compliance Policy, Sexual Assault Coordinated Response Plan, first responder training materials, and ACT responses applicable to this provision. ACT responses indicate first responders are trained regarding evidence preservation, separation of involved parties, and protection of potential crime scenes. The ACT data corroborates the facility's written procedures and demonstrates implementation of first responder responsibilities consistent with PREA requirements.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides has incorporated first responder responsibilities into policy, training materials, and coordinated response procedures. The Sexual Assault Coordinated Response Plan reviewed by the Auditor identifies responsibilities for staff responding to allegations of sexual abuse and establishes procedures intended to preserve evidence and support investigations. Random staff consistently identified immediate safety, separation, preservation of evidence, prompt notification, and protection of the youth as first-responder priorities.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.364(a).

115.364(b)

Policy Review and Analysis

This provision establishes the following requirement: if the first staff responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Coordinated Response Plan., Coordinated Response Plan. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address staff first responder duties and establish the expected practice applicable to 115.364(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Auditor reviewed first responder procedures, training materials, and ACT responses applicable to this provision. ACT responses indicate first responders are

	required to protect crime scenes and preserve evidence. The ACT data corroborates the facility's procedures and demonstrates implementation of evidence preservation requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures requiring first responders to preserve and protect evidence following allegations of sexual abuse. Training materials reinforce these responsibilities and provide staff with guidance regarding appropriate response actions. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.364(b). Auditor Analysis and Determination Twelve random staff interviews demonstrated consistent knowledge of first-responder duties: separate the involved youth, preserve the scene, prevent actions that could destroy evidence, immediately notify supervision, and obtain medical or mental-health assistance. The Exit Meeting Agenda identified staff first-responder knowledge as a facility strength. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.364. Standard Finding Meets Standard

115.365	**Coordinated response**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.365 - Coordinated response Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Sexual Assault Coordinated Response Plan. - Coordinated Response Documentation. - Medical, mental-health, leadership, and first-responder questionnaires. - Day One MOU.

	- Ocean Tides ACT/PAQ responses for Standard 115.365. - Coordinated Response Plan - Medical, mental-health, leadership, and investigator questionnaires - Staff interviews Provision Analysis 115.365(a) Policy Review and Analysis This provision establishes the following requirement: the facility shall develop a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Day One MOU., Coordinated Response Plan. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Ocean Tides shall maintain a coordinated response plan to ensure an effective, organized, and timely response to incidents of sexual abuse." This policy establishes the facility's requirement to maintain a coordinated response system that identifies responsibilities and response actions following allegations of sexual abuse. The policy supports effective communication, accountability, and coordination among staff involved in incident response. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, Sexual Assault Coordinated Response Plan, coordinated response documentation, and ACT responses applicable to this provision. ACT responses indicate that Ocean Tides maintains a written coordinated response plan and that responsibilities are assigned to appropriate staff and service providers. The ACT data corroborates the facility's written procedures and demonstrates implementation of a coordinated response system consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides has developed a Sexual Assault Coordinated Response Plan identifying responsibilities for facility leadership, direct care staff, medical personnel, mental health staff, investigators, and other individuals involved in responding to allegations of sexual abuse. The plan reviewed by the Auditor establishes procedures governing reporting, evidence preservation, notifications, medical care, victim support, and investigative coordination. Based on the totality of the evidence, the Auditor determined that Ocean Tides

	School - Narragansett Campus meets the requirements of provision 115.365(a). Auditor Analysis and Determination The written coordinated-response plan assigns responsibilities to first responders, supervisors, investigators, medical and mental-health staff, advocates, retaliation monitors, and leadership. Specialized questionnaires and staff interviews demonstrated role-specific understanding of the plan. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.365. Standard Finding Meets Standard

115.366	**Preservation of ability to protect residents from contact with abusers**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.366 - Preservation of ability to protect residents from contact with abusers Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Personnel Policies. - Collective Bargaining and Employment Documentation, if applicable. - Disciplinary and personnel policies. - Human Resources questionnaire. - Ocean Tides ACT/PAQ responses for Standard 115.366. - Personnel Code of Ethics - Agency Head questionnaire - Human Resources questionnaire Provision Analysis 115.366(a)

Policy Review and Analysis

This provision establishes the following requirement: neither the agency nor any other governmental entity responsible for collective bargaining on the agency's behalf shall enter into or renew any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Any employee who engages in, fails to report, or knowingly condones sexual abuse, sexual harassment, voyeurism, or inappropriate relationships with youth shall be subject to disciplinary action, up to and including termination." This policy establishes the facility's authority to take personnel action when allegations of sexual abuse, sexual harassment, or related misconduct arise. The policy supports the agency's ability to protect residents by taking appropriate action when employee conduct creates a potential risk to resident safety.

ACT/PAQ Review

The Auditor reviewed the Ocean Tides PREA Compliance Policy, personnel policies, employment documentation, and ACT responses applicable to this provision. ACT responses indicate that no agreement limits the facility's ability to remove alleged staff sexual abusers from contact with residents pending investigation outcomes. The ACT data corroborates the facility's written procedures and demonstrates the agency's ability to implement protective measures when necessary to ensure resident safety.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides maintains personnel procedures that permit administrative action when allegations involving sexual abuse or sexual harassment occur. The documentation reviewed supports the facility's ability to remove staff from duties, restrict contact with residents, and take other appropriate measures pending the outcome of investigations.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.366(a).

115.366(b)

Policy Review and Analysis

This provision establishes the following requirement: nothing in this standard shall restrict the entering into or renewal of agreements that govern: (1) The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions of §§ 115.372 and 115.376; or (2) Whether a no-contact assignment that

	is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.366 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review No collective-bargaining agreement limited the agency's ability to remove an alleged staff abuser from resident contact. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.366(b). Auditor Analysis and Determination The agency's at-will employment framework, personnel policies, and leadership responses preserved the ability to place an accused staff member on administrative leave or otherwise separate that person from residents while an investigation was pending. No collective-bargaining restriction was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.366. Standard Finding Meets Standard

115.367	**Agency protection against retaliation**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.367 - Agency protection against retaliation Evidence Reviewed

- Ocean Tides PREA Compliance Policy.

- Retaliation Monitoring Procedures.

- Retaliation Monitoring Documentation.

- Retaliation-monitor questionnaire.

- Policy and monitoring procedures.

- Data Collection Part Two.

- Ocean Tides ACT/PAQ responses for Standard 115.367.

- Non-Retaliation and Monitoring Policy

- Retaliation Monitor questionnaire

- Audit-period allegation record

Provision Analysis

115.367(a)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall establish a policy to 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 and shall designate which staff members or departments are charged with monitoring retaliation. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Retaliation Monitoring Procedures., Policy and monitoring procedures., Non-Retaliation and Monitoring Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "All individuals involved in a PREA incident including the victim, witnesses, staff members, or third-party reporters will be monitored for retaliation by the PREA Coordinator by personal interview every thirty days for at a minimum of 90 days." This policy establishes the facility's responsibility to protect residents and staff from retaliation following reports of sexual abuse or sexual harassment. The policy recognizes that fear of retaliation can discourage reporting and cooperation with investigations and therefore requires ongoing monitoring of individuals who may be vulnerable to retaliatory actions.

ACT/PAQ Review

The Auditor reviewed the Ocean Tides PREA Compliance Policy, retaliation monitoring procedures, monitoring documentation, and ACT responses applicable to this provision. ACT responses indicate monitoring is conducted for residents and

staff who report sexual abuse or sexual harassment or who cooperate with investigations. The ACT data corroborates the facility's written policy and demonstrates implementation of retaliation monitoring requirements consistent with PREA standards.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides has established procedures governing retaliation monitoring and assigns responsibility for monitoring activities to designated personnel. The documentation reviewed supports the facility's efforts to identify, document, and respond to indicators of retaliation. The designated retaliation-monitor questionnaire describes a 90-day monitoring process, treatment-team review, incident-report review, increased supervision, and protective changes when needed.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.367(a).

115.367(b)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall employ multiple protection measures, such as 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 residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Retaliation Monitoring Procedures., Policy and monitoring procedures., Non-Retaliation and Monitoring Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Monitoring will continue if concerns for retaliation remain." This policy establishes the facility's authority to continue retaliation monitoring beyond the minimum monitoring period when circumstances warrant additional oversight.

ACT/PAQ Review

The Auditor reviewed retaliation monitoring procedures, monitoring documentation, and ACT responses applicable to this provision. ACT responses indicate retaliation monitoring is conducted for a minimum of 90 days and continues beyond that period when appropriate. The ACT data corroborates the facility's written procedures and demonstrates implementation of ongoing monitoring requirements.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides has established procedures requiring ongoing evaluation of retaliation concerns and continuation of monitoring when necessary to ensure resident and staff safety.

	Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.367(b). 115.367(c) Policy Review and Analysis This provision establishes the following requirement: for at least 90 days following a report of sexual abuse, the agency shall monitor the conduct or treatment of residents or staff who reported the sexual abuse and of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff and shall act promptly to remedy any such retaliation. Items the agency should monitor include any resident disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The agency shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Retaliation Monitoring Procedures., Policy and monitoring procedures., Non-Retaliation and Monitoring Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address agency protection against retaliation and establish the expected practice applicable to 115.367(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed retaliation monitoring procedures and ACT responses applicable to this provision. ACT responses indicate retaliation monitoring activities are conducted by designated personnel responsible for overseeing PREA-related retaliation concerns. The ACT data corroborates the facility's monitoring practices and demonstrates implementation of procedures intended to protect residents and staff from retaliation. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures requiring prompt action when evidence of retaliation is identified. The facility's procedures support intervention and protective measures designed to prevent additional harm. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.367(c). 115.367(d) Policy Review and Analysis This provision establishes the following requirement: in the case of residents, such

	monitoring shall also include periodic status checks. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Retaliation Monitoring Procedures., Policy and monitoring procedures., Non-Retaliation and Monitoring Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address agency protection against retaliation and establish the expected practice applicable to 115.367(d). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.367 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Retaliation-monitor questionnaire, Policy and monitoring procedures, Data Collection Part Two. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.367(d). 115.367(e) Policy Review and Analysis This provision establishes the following requirement: if any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Retaliation Monitoring Procedures., Policy and monitoring procedures., Non-Retaliation and Monitoring Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address agency protection against retaliation and establish the expected practice applicable to 115.367(e). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.367 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review

	Relevant evidence included Retaliation-monitor questionnaire, Policy and monitoring procedures, Data Collection Part Two. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.367(e). 115.367(f) Policy Review and Analysis This provision establishes the following requirement: an agency's obligation to monitor shall terminate if the agency determines that the allegation is unfounded. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Retaliation Monitoring Procedures., Policy and monitoring procedures., Non-Retaliation and Monitoring Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.367 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The retaliation-monitoring framework permits termination of monitoring when an allegation is determined unfounded, consistent with the audit-period case. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.367(f). Auditor Analysis and Determination The non-retaliation policy, designated monitor questionnaire, and staff interviews established monitoring for residents, staff, witnesses, and reporters. The only audit-period allegation was determined unfounded; under the standard, monitoring may terminate when an allegation is unfounded. No retaliation concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.367. Standard Finding Meets Standard

115.368	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.368 - Post-allegation protective custody Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Resident Supervision Procedures. - Housing and Placement Documentation. - Onsite verification of one dorm, private bedrooms, and no isolation unit. - Leadership questionnaire. - Observation checklist. - Ocean Tides ACT/PAQ responses for Standard 115.368. - PREA Compliance Policy - Housing and protective-separation procedures - Facility tour confirming no isolation unit Provision Analysis 115.368(a) Policy Review and Analysis This provision establishes the following requirement: any use of segregated housing to protect a resident who is alleged to have suffered sexual abuse shall be subject to the requirements of § 115.342. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Supervision Procedures., PREA Compliance Policy, Housing and protective-separation procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Residents at high risk for sexual victimization shall be provided protection without relying on isolation except as a last resort when less restrictive alternatives are unavailable." This policy establishes the facility's commitment to protecting residents through the least restrictive means available and recognizes the potential negative impact of isolation on youth. ACT/PAQ Review

	The Auditor reviewed the Ocean Tides PREA Compliance Policy, resident supervision procedures, housing documentation, and ACT responses applicable to this provision. ACT responses indicate residents at risk of sexual victimization are not placed in isolation as a means of protection except in limited circumstances permitted by PREA. The ACT data corroborates the facility's written policy and demonstrates implementation of protective measures consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides utilizes individualized supervision, housing adjustments, programming modifications, and other protective measures when resident safety concerns are identified. The documentation reviewed supports the facility's efforts to protect residents while maintaining access to programs, services, and activities whenever possible. The tour confirmed one dormitory area, private bedrooms for each youth, and no isolation unit. Staff described using separation, supervision, and private-room placement without suspending education, exercise, programming, or services. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.368(a). Auditor Analysis and Determination Policy and housing practices prohibit using isolation as a substitute for protection unless less restrictive measures are unavailable. Onsite observation confirmed that Ocean Tides has no isolation unit and uses individualized supervision, private bedrooms, and ordinary programming to support safety. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.368. Standard Finding Meets Standard

115.371	**Criminal and administrative agency investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.371 - Criminal and administrative agency investigations Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Investigation Procedures.

	- Investigator Training Documentation. - Sexual Assault Coordinated Response Plan. - Data Collection Part Two. - Specialized investigator training certificate. - Policy and referral documentation. - Ocean Tides ACT/PAQ responses for Standard 115.371. - Investigator training certificate - Audit-period youth-on-youth sexual-harassment investigation - Exit Meeting Agenda onsite investigation verification - RSAS-106 Exit Meeting Agenda for Ocean Tides Provision Analysis 115.371(a) Policy Review and Analysis This provision establishes the following requirement: when the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Sexual Assault Coordinated Response Plan., Policy and referral documentation.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "All allegations of sexual abuse and sexual harassment shall be investigated promptly, thoroughly, and objectively." This policy establishes the facility's requirement that allegations receive professional review regardless of the source of the report or the identity of the individuals involved. The policy supports accountability, resident safety, and compliance with PREA investigative standards. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, investigation procedures, investigator training records, coordinated response documentation, and ACT responses applicable to this provision. ACT responses indicate all allegations of sexual abuse and sexual harassment are investigated and that investigations are conducted promptly, thoroughly, and objectively. The ACT data corroborates the facility's written procedures and demonstrates implementation of investigative requirements consistent with PREA standards.

	Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures governing administrative investigations, evidence collection, witness interviews, documentation requirements, and coordination with outside investigative agencies when appropriate. The documentation reviewed supports implementation of a structured investigative process. Data Collection Part Two reports no sexual-abuse allegation during the review period. The single youth-on-youth sexual-harassment allegation was administratively investigated and found unfounded. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.371(a). 115.371(b) Policy Review and Analysis This provision establishes the following requirement: where sexual abuse is alleged, the agency shall use investigators who have received special training in sexual abuse investigations involving juvenile victims pursuant to § 115.334. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Sexual Assault Coordinated Response Plan., Policy and referral documentation.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address criminal and administrative agency investigations and establish the expected practice applicable to 115.371(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed investigation procedures, investigator training documentation, and ACT responses applicable to this provision. ACT responses indicate investigators gather and preserve direct and circumstantial evidence during investigations. The ACT data corroborates the facility's investigative procedures and demonstrates implementation of evidence collection requirements. Documentation Review Documentation reviewed demonstrates that investigators receive training regarding evidence collection, interviewing techniques, credibility assessments, and investigative documentation. The procedures reviewed require investigators to gather direct and circumstantial evidence and maintain appropriate investigative records. The completed Exit Meeting Agenda confirms that the Auditor reviewed the

	single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.371(b). 115.371(c) Policy Review and Analysis This provision establishes the following requirement: investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Sexual Assault Coordinated Response Plan., Policy and referral documentation. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address criminal and administrative agency investigations and establish the expected practice applicable to 115.371(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed investigative procedures and ACT responses applicable to this provision. ACT responses indicate credibility assessments are not based solely on an individual's status as a resident or employee. The ACT data corroborates the facility's investigative practices and demonstrates implementation of objective investigative standards. Documentation Review Documentation reviewed demonstrates that Ocean Tides requires credibility determinations to be based upon evidence gathered during investigations rather than an individual's status as a resident or staff member. These procedures support fair, objective, and professional investigations. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.371(c). 115.371(d) Policy Review and Analysis

	This provision establishes the following requirement: the agency shall not terminate an investigation solely because the source of the allegation recants the allegation. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Sexual Assault Coordinated Response Plan., Policy and referral documentation. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address criminal and administrative agency investigations and establish the expected practice applicable to 115.371(d). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed investigation procedures, referral documentation, and ACT responses applicable to this provision. ACT responses indicate substantiated allegations involving potentially criminal conduct are referred for prosecution. The ACT data corroborates the facility's written procedures and demonstrates implementation of criminal referral requirements consistent with PREA standards. Documentation Review Documentation reviewed demonstrates that allegations involving potentially criminal conduct are referred to appropriate law enforcement authorities when warranted. These procedures support coordination between administrative and criminal investigative processes. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.371(d). 115.371(e) Policy Review and Analysis This provision establishes the following requirement: when the quality of evidence appears to support criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Sexual Assault Coordinated Response Plan., Policy and referral documentation. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address criminal and administrative agency investigations and establish the expected practice applicable to 115.371(e). Policy was treated as the agency's stated expectation, not

as independent proof of implementation.

ACT/PAQ Review

The Ocean Tides ACT/PAQ response for Standard 115.371 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof.

Documentation Review

Relevant evidence included Data Collection Part Two, Specialized investigator training certificate, Policy and referral documentation. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.371(e).

115.371(f)

Policy Review and Analysis

This provision establishes the following requirement: the credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as resident or staff. No agency shall require a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Sexual Assault Coordinated Response Plan., Policy and referral documentation. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation.

ACT/PAQ Review

The ACT/PAQ response for Standard 115.371 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation.

Documentation Review

The onsite-reviewed investigation record supported prompt, objective administrative investigation, evidence review, credibility assessment, written findings, and retention. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that

	no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.371(f). 115.371(g) Policy Review and Analysis This provision establishes the following requirement: administrative investigations: (1) Shall include an effort to determine whether staff actions or failures to act contributed to the abuse; and (2) Shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Sexual Assault Coordinated Response Plan., Policy and referral documentation. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.371 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The onsite-reviewed investigation record supported prompt, objective administrative investigation, evidence review, credibility assessment, written findings, and retention. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.371(g). 115.371(h) Policy Review and Analysis This provision establishes the following requirement: criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Sexual Assault Coordinated Response Plan., Policy and referral documentation. The written

requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation.

ACT/PAQ Review

The ACT/PAQ response for Standard 115.371 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation.

Documentation Review

The onsite-reviewed investigation record supported prompt, objective administrative investigation, evidence review, credibility assessment, written findings, and retention. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.371(h).

115.371(i)

Policy Review and Analysis

This provision establishes the following requirement: substantiated allegations of conduct that appears to be criminal shall be referred for prosecution. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Sexual Assault Coordinated Response Plan., Policy and referral documentation. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation.

ACT/PAQ Review

The ACT/PAQ response for Standard 115.371 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation.

Documentation Review

The onsite-reviewed investigation record supported prompt, objective administrative investigation, evidence review, credibility assessment, written findings, and retention. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that

	no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.371(i). 115.371(j) Policy Review and Analysis This provision establishes the following requirement: the agency shall retain all written reports referenced in paragraphs (g) and (h) of this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years, unless the abuse was committed by a juvenile resident and applicable law requires a shorter period of retention. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Sexual Assault Coordinated Response Plan., Policy and referral documentation. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.371 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The onsite-reviewed investigation record supported prompt, objective administrative investigation, evidence review, credibility assessment, written findings, and retention. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.371(j). 115.371(k) Policy Review and Analysis This provision establishes the following requirement: 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. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Sexual Assault Coordinated Response Plan., Policy and referral documentation. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and

	file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.371 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The onsite-reviewed investigation record supported prompt, objective administrative investigation, evidence review, credibility assessment, written findings, and retention. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.371(k). 115.371(l) Policy Review and Analysis This provision establishes the following requirement: any State entity or Department of Justice component that conducts such investigations shall do so pursuant to the above requirements. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Sexual Assault Coordinated Response Plan., Policy and referral documentation.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.371 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The onsite-reviewed investigation record supported prompt, objective administrative investigation, evidence review, credibility assessment, written findings, and retention. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides

School - Narragansett Campus meets the requirements of provision 115.371(l).

115.371(m)

Policy Review and Analysis

This provision establishes the following requirement: when outside agencies investigate sexual abuse, the facility shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Sexual Assault Coordinated Response Plan., Policy and referral documentation. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation.

ACT/PAQ Review

The ACT/PAQ response for Standard 115.371 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation.

Documentation Review

The onsite-reviewed investigation record supported prompt, objective administrative investigation, evidence review, credibility assessment, written findings, and retention. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.371(m).

Auditor Analysis and Determination

The single audit-period youth-on-youth sexual-harassment allegation was administratively investigated and determined unfounded. Investigator training, written procedures, and the ordinary-course investigation record were reviewed. The Exit Meeting Agenda confirms that the Auditor reviewed the matter onsite and identified no issue or concern.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.371.

Standard Finding

Meets Standard

115.372	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.372 - Evidentiary standard for administrative investigations Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Investigation Procedures. - Investigator Training Documentation. - Investigation policy. - Data Collection Part Two. - Investigator training documentation. - Ocean Tides ACT/PAQ responses for Standard 115.372. - Investigation procedures - Audit-period investigation record - Exit Meeting Agenda onsite investigation verification - RSAS-106 Exit Meeting Agenda for Ocean Tides Provision Analysis 115.372(a) Policy Review and Analysis This provision establishes the following requirement: the agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Investigation policy., Investigation procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Administrative investigations shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated." This policy establishes the evidentiary standard utilized during administrative investigations involving allegations of sexual abuse and sexual harassment. The policy ensures that investigators apply a consistent standard when evaluating evidence and reaching

	investigative findings. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, investigation procedures, investigator training documentation, and ACT responses applicable to this provision. ACT responses indicate that administrative investigations impose no standard higher than a preponderance of the evidence when determining whether allegations are substantiated. The ACT data corroborates the facility's written policy and demonstrates implementation of investigative procedures consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides has incorporated the preponderance of the evidence standard into its investigative procedures and investigator training materials. The documentation supports the facility's efforts to conduct investigations in a manner consistent with PREA requirements and accepted investigative practices. The single audit-period administrative matter was an unfounded sexual-harassment allegation. Data Collection Part Two is the controlling source for its classification and outcome. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.372(a). Auditor Analysis and Determination The investigation procedures apply no evidentiary burden higher than a preponderance of the evidence for administrative findings. The audit-period investigation used an administrative finding, and no conflicting evidentiary requirement was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.372. Standard Finding Meets Standard

115.373	**Reporting to residents**
	Auditor Overall Determination: Meets Standard

	Auditor Discussion
	Standard 115.373 - Reporting to residents Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Investigation Procedures. - Resident Notification Documentation. - Notification policy. - Data Collection Part Two. - Ocean Tides ACT/PAQ responses for Standard 115.373. - Notification procedures - Audit-period investigation record - Exit Meeting Agenda onsite investigation verification - RSAS-106 Exit Meeting Agenda for Ocean Tides Provision Analysis 115.373(a) Policy Review and Analysis This provision establishes the following requirement: following an investigation into a resident's allegation of sexual abuse suffered in an agency facility, the agency shall inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Notification policy., Notification procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Following an investigation into a resident's allegation of sexual abuse, the resident shall be informed as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded." This policy establishes the facility's responsibility to notify residents regarding the outcome of investigations involving allegations of sexual abuse. The policy supports transparency and ensures residents are informed regarding the disposition of allegations they have reported. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, investigation procedures, resident notification documentation, and ACT responses applicable to

	this provision. ACT responses indicate residents are notified when allegations are determined to be substantiated, unsubstantiated, or unfounded. The ACT data corroborates the facility's written policy and demonstrates implementation of resident notification requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures governing resident notifications following completion of investigations. The documentation reviewed supports the facility's efforts to ensure residents receive timely information regarding investigative outcomes. No sexual-abuse investigation required resident notification under this provision during the review period. The notification policy remains available for a qualifying case. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.373(a). 115.373(b) Policy Review and Analysis This provision establishes the following requirement: if the agency did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the resident. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Notification policy., Notification procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address reporting to residents and establish the expected practice applicable to 115.373(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed notification procedures, investigative documentation, and ACT responses applicable to this provision. ACT responses indicate resident notifications are documented and maintained in accordance with facility procedures. The ACT data corroborates the facility's notification practices and demonstrates implementation of documentation requirements associated with resident notifications. Documentation Review Documentation reviewed demonstrates that Ocean Tides maintains procedures requiring additional notifications when information becomes available that affects a

resident's safety or the disposition of an allegation. These procedures support ongoing communication with residents when required by PREA standards. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.373(b).

115.373(c)

Policy Review and Analysis

This provision establishes the following requirement: following a resident's allegation that a staff member has committed sexual abuse against the resident, the agency shall subsequently inform the resident (unless the agency has determined that the allegation is unfounded) whenever: (1) The staff member is no longer posted within the resident's unit; (2) The staff member is no longer employed at the facility; (3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or (4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Notification policy., Notification procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address reporting to residents and establish the expected practice applicable to 115.373(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Ocean Tides ACT/PAQ response for Standard 115.373 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof.

Documentation Review

Relevant evidence included Notification policy, Data Collection Part Two. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.373(c).

115.373(d)

	Policy Review and Analysis This provision establishes the following requirement: following a resident's allegation that he or she has been sexually abused by another resident, the agency shall subsequently inform the alleged victim whenever: (1) The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or (2) The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Notification policy., Notification procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address reporting to residents and establish the expected practice applicable to 115.373(d). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.373 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Notification policy, Data Collection Part Two. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.373(d). 115.373(e) Policy Review and Analysis This provision establishes the following requirement: all such notifications or attempted notifications shall be documented. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Notification policy., Notification procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address reporting to residents and establish the expected practice applicable to 115.373(e). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review

	The Ocean Tides ACT/PAQ response for Standard 115.373 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Notification policy, Data Collection Part Two. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.373(e). 115.373(f) Policy Review and Analysis This provision establishes the following requirement: an agency's obligation to report under this standard shall terminate if the resident is released from the agency's custody. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Investigation Procedures., Notification policy., Notification procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.373 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The written process addresses resident notification and the circumstances under which notification duties end. The completed Exit Meeting Agenda confirms that the Auditor reviewed the single audit-period youth-on-youth sexual-harassment investigation onsite, that the matter was administratively investigated and determined unfounded, and that no issue or concern was identified. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.373(f). Auditor Analysis and Determination Notification procedures require residents to be informed of the outcome of qualifying sexual-abuse investigations. The audit-period matter was classified as sexual harassment and found unfounded; onsite review identified no notification

	concern. The written process addresses required notifications when this standard applies. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.373. Standard Finding Meets Standard

115.376	**Disciplinary sanctions for staff**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.376 - Disciplinary sanctions for staff Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Personnel Policies. - Employee Discipline Procedures. - Employee discipline policy. - Human Resources questionnaire. - Data Collection Part Two. - Ocean Tides ACT/PAQ responses for Standard 115.376. - Personnel Code of Ethics - PREA Compliance Policy - Agency Head and Human Resources questionnaires Provision Analysis 115.376(a) Policy Review and Analysis This provision establishes the following requirement: staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Employee Discipline Procedures., Employee discipline policy., PREA Compliance Policy. The written

	requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Any employee who engages in, fails to report, or knowingly condones sexual abuse, sexual harassment, voyeurism, or inappropriate relationships with youth shall be subject to disciplinary action, up to and including termination." This policy establishes the facility's expectations regarding employee conduct and identifies disciplinary consequences for violations involving sexual abuse, sexual harassment, or related misconduct. The policy reinforces accountability and supports resident safety by addressing employee behavior inconsistent with agency standards. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, personnel policies, disciplinary procedures, and ACT responses applicable to this provision. ACT responses indicate employees are subject to disciplinary sanctions up to and including termination for violations of sexual abuse and sexual harassment policies. The ACT data corroborates the facility's written policy and demonstrates implementation of disciplinary procedures consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established personnel procedures governing disciplinary actions and employee accountability. The documentation reviewed supports the facility's authority to impose disciplinary sanctions when employee conduct violates PREA requirements or agency policy. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.376(a). 115.376(b) Policy Review and Analysis This provision establishes the following requirement: termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Employee Discipline Procedures., Employee discipline policy., PREA Compliance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address disciplinary sanctions for staff and establish the expected practice applicable to 115.376(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed personnel procedures, disciplinary documentation, and ACT

responses applicable to this provision. ACT responses indicate termination is the presumptive disciplinary sanction for staff who engage in sexual abuse and that sanctions are commensurate with the nature and circumstances of the violation. The ACT data corroborates the facility's disciplinary practices and demonstrates implementation of accountability measures consistent with PREA standards.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides considers the nature and circumstances of misconduct when determining disciplinary outcomes. Personnel procedures reviewed by the Auditor support proportional disciplinary responses while maintaining accountability for violations involving resident safety.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.376(b).

115.376(c)

Policy Review and Analysis

This provision establishes the following requirement: disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) 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. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Employee Discipline Procedures., Employee discipline policy., PREA Compliance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address disciplinary sanctions for staff and establish the expected practice applicable to 115.376(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Ocean Tides ACT/PAQ response for Standard 115.376 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof.

Documentation Review

Relevant evidence included Employee discipline policy, Human Resources questionnaire, Data Collection Part Two.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.376(c).

115.376(d)

	Policy Review and Analysis This provision establishes the following requirement: 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. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Employee Discipline Procedures., Employee discipline policy., PREA Compliance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address disciplinary sanctions for staff and establish the expected practice applicable to 115.376(d). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.376 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Employee discipline policy, Human Resources questionnaire, Data Collection Part Two. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.376(d). Auditor Analysis and Determination Personnel policies and leadership questionnaires establish discipline up to termination for staff sexual abuse and appropriate sanctions for other PREA violations, with reporting to law enforcement and licensing bodies when required. No audit-period staff allegation required discipline. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.376. Standard Finding Meets Standard

115.377	**Corrective action for contractors and volunteers**
	Auditor Overall Determination: Meets Standard

	Auditor Discussion
	Standard 115.377 - Corrective action for contractors and volunteers Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Data Collection Part Two. - Ocean Tides ACT/PAQ responses for Standard 115.377. - Contractor and volunteer questionnaires - PREA Compliance Policy - Corrective-action procedures Provision Analysis 115.377(a) Policy Review and Analysis This provision establishes the following requirement: 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. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Contractor and volunteer questionnaires, PREA Compliance Policy, Corrective-action procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Any volunteer or contractor who engages in sexual abuse shall be prohibited from contact with youth and shall be reported to law enforcement and relevant licensing authorities when appropriate." This policy establishes the facility's expectations regarding volunteer and contractor conduct and identifies corrective actions that may be taken when violations occur. The policy supports resident safety and reinforces accountability for individuals who provide services within the facility. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, contractor and volunteer policies, training documentation, and ACT responses applicable to this provision. ACT responses indicate contractors and volunteers who engage in sexual abuse are prohibited from contact with residents. The ACT data corroborates the facility's written policy and demonstrates implementation of corrective action requirements consistent with PREA standards. Documentation Review

	Documentation reviewed demonstrates that Ocean Tides has established procedures governing volunteer and contractor conduct, reporting responsibilities, and corrective actions when violations occur. The documentation reviewed supports the facility's ability to respond appropriately to misconduct involving non-employees. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.377(a). 115.377(b) Policy Review and Analysis This provision establishes the following requirement: the facility shall take appropriate remedial measures and shall consider whether to prohibit further contact with residents, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Contractor and volunteer questionnaires, PREA Compliance Policy, Corrective-action procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address corrective action for contractors and volunteers and establish the expected practice applicable to 115.377(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed contractor and volunteer procedures and ACT responses applicable to this provision. ACT responses indicate appropriate remedial measures are taken when contractors or volunteers violate PREA-related policies. The ACT data corroborates the facility's procedures and demonstrates implementation of corrective action requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides maintains procedures allowing for remedial action, restriction of access, removal from service, and other corrective measures when volunteers or contractors violate PREA-related requirements. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.377(b). Auditor Analysis and Determination Policy and questionnaires establish removal from resident contact and appropriate remedial action for contractors or volunteers who violate PREA requirements. No audit-period allegation involved a contractor or volunteer.

	Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.377. Standard Finding Meets Standard

115.378	Interventions and disciplinary sanctions for residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.378 - Interventions and disciplinary sanctions for residents Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Resident Discipline Policy. - Behavioral Intervention Procedures. - Treatment Documentation. - Resident discipline policy. - Data Collection Part Two. - Ocean Tides ACT/PAQ responses for Standard 115.378. - Resident Handbook - PREA Compliance Policy - Youth discipline and intervention procedures Provision Analysis 115.378(a) Policy Review and Analysis This provision establishes the following requirement: a resident may be subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that the resident engaged in resident-on- resident sexual abuse or following a criminal finding of guilt for resident-on-resident sexual abuse. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Discipline Policy., Behavioral Intervention Procedures.,

	Resident discipline policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Residents shall be subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that the resident engaged in resident-on-resident sexual abuse or following a criminal finding of guilt." This policy establishes the circumstances under which disciplinary sanctions may be imposed for resident-on-resident sexual abuse. The policy supports due process and ensures disciplinary decisions are based upon investigative findings rather than allegations alone. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, resident discipline procedures, treatment documentation, and ACT responses applicable to this provision. ACT responses indicate residents are subject to disciplinary sanctions only following administrative or criminal findings. The ACT data corroborates the facility's written policy and demonstrates implementation of disciplinary procedures consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established disciplinary procedures governing resident misconduct and behavioral interventions. The documentation reviewed supports the facility's efforts to ensure disciplinary actions are based upon substantiated findings and appropriate review. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.378(a). 115.378(b) Policy Review and Analysis This provision establishes the following requirement: any disciplinary 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. In the event a disciplinary sanction results in the isolation of a resident, agencies shall not deny the resident daily large-muscle exercise or access to any legally required educational programming or special education services. Residents in isolation shall receive daily visits from a medical or mental health care clinician. and the remaining elements stated in the provision. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Discipline Policy., Behavioral Intervention Procedures., Resident discipline policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address interventions and disciplinary sanctions for residents and establish the expected

practice applicable to 115.378(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Auditor reviewed resident discipline procedures, treatment documentation, and ACT responses applicable to this provision. ACT responses indicate disciplinary sanctions are proportionate to the nature and circumstances of the abuse committed. The ACT data corroborates the facility's disciplinary practices and demonstrates implementation of proportional intervention requirements.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides considers the nature and circumstances of misconduct, disciplinary history, and treatment needs when determining appropriate interventions. The facility's procedures support individualized responses designed to address behavior while promoting resident safety.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.378(b).

115.378(c)

Policy Review and Analysis

This provision establishes the following requirement: the disciplinary process shall consider whether a resident's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Discipline Policy., Behavioral Intervention Procedures., Resident discipline policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address interventions and disciplinary sanctions for residents and establish the expected practice applicable to 115.378(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Auditor reviewed treatment procedures, behavioral intervention documentation, and ACT responses applicable to this provision. ACT responses indicate therapeutic interventions are considered when appropriate. The ACT data corroborates the facility's treatment-oriented approach and demonstrates implementation of intervention practices consistent with PREA requirements.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides considers therapeutic

	interventions, counseling, and treatment services when responding to resident misconduct involving sexual abuse. These procedures support rehabilitation and behavior change while maintaining accountability. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.378(c). 115.378(d) Policy Review and Analysis This provision establishes the following requirement: if the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to offer the offending resident participation in such interventions. The agency may require participation in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives, but not as a condition to access to general programming or education. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Discipline Policy., Behavioral Intervention Procedures., Resident discipline policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Residents shall not be disciplined for making a report of sexual abuse in good faith, even if the allegation cannot be substantiated." This policy protects residents who report allegations in good faith and encourages reporting of sexual abuse and sexual harassment without fear of disciplinary consequences. ACT/PAQ Review The Auditor reviewed resident reporting procedures, discipline policies, and ACT responses applicable to this provision. ACT responses indicate residents are not disciplined for reporting sexual abuse made in good faith. The ACT data corroborates the facility's written policy and demonstrates implementation of protections intended to encourage reporting and support resident safety. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures designed to encourage reporting and protect residents from inappropriate disciplinary action related to good-faith allegations. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.378(d). 115.378(e) Policy Review and Analysis

	This provision establishes the following requirement: the agency may discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Discipline Policy., Behavioral Intervention Procedures., Resident discipline policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address interventions and disciplinary sanctions for residents and establish the expected practice applicable to 115.378(e). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.378 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Resident discipline policy, Data Collection Part Two. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.378(e). 115.378(f) Policy Review and Analysis This provision establishes the following requirement: for the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Discipline Policy., Behavioral Intervention Procedures., Resident discipline policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address interventions and disciplinary sanctions for residents and establish the expected practice applicable to 115.378(f). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.378 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof.

	Documentation Review Relevant evidence included Resident discipline policy, Data Collection Part Two. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.378(f). 115.378(g) Policy Review and Analysis This provision establishes the following requirement: an agency may, in its discretion, prohibit all sexual activity between residents and may discipline residents for such activity. An agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Resident Discipline Policy., Behavioral Intervention Procedures., Resident discipline policy.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address interventions and disciplinary sanctions for residents and establish the expected practice applicable to 115.378(g). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.378 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Resident discipline policy, Data Collection Part Two. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.378(g). Auditor Analysis and Determination Resident discipline and intervention procedures require individualized, proportionate responses and prohibit discipline for good-faith reporting. No audit-period finding required a resident sanction for sexual abuse. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.378. Standard Finding Meets Standard

115.381	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.381 - Medical and mental health screenings; history of sexual abuse Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Medical Services Procedures. - Mental Health Services Procedures. - Intake Screening Documentation. - Medical and mental-health screening procedures. - Mental-health questionnaires. - Prior-victimization follow-up memorandum. - Ocean Tides ACT/PAQ responses for Standard 115.381. - Medical Services Policy - Mental-health follow-up memorandum - Medical and mental-health questionnaires - Screening records Provision Analysis 115.381(a) Policy Review and Analysis This provision establishes the following requirement: if the screening pursuant to § 115.341 indicates that a resident has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure that the resident is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical Services Procedures., Mental Health Services Procedures., Medical and mental-health screening procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "If the screening indicates that a youth has experienced prior sexual victimization, whether it occurred in an

	institutional setting or in the community, staff shall ensure that the youth is offered a follow-up meeting with a medical or mental health practitioner." This policy establishes the facility's responsibility to ensure residents who disclose prior sexual victimization receive access to appropriate medical or mental health services. The policy recognizes the potential impact of prior victimization and supports early intervention and treatment planning. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, intake screening documentation, medical and mental health procedures, and ACT responses applicable to this provision. ACT responses indicate residents who disclose prior sexual victimization are offered follow-up meetings with qualified practitioners. The ACT data corroborates the facility's written policy and demonstrates implementation of referral practices consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides incorporates questions regarding prior sexual victimization into the screening process and has established procedures for referral to appropriate medical or mental health professionals when disclosures occur. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.381(a). 115.381(b) Policy Review and Analysis This provision establishes the following requirement: if the screening pursuant to § 115.341 indicates that a resident has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff shall ensure that the resident is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical Services Procedures., Mental Health Services Procedures., Medical and mental-health screening procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "If the screening indicates that a youth has previously perpetrated sexual abuse, staff shall ensure that the youth is offered a follow-up meeting with a mental health practitioner." This policy establishes the facility's responsibility to provide mental health assessment and intervention opportunities for residents who disclose prior sexually abusive behavior. The policy supports individualized treatment planning and resident safety. ACT/PAQ Review The Auditor reviewed the PREA Compliance Policy, screening documentation, mental

	health procedures, and ACT responses applicable to this provision. ACT responses indicate residents who disclose prior sexually abusive behavior are offered follow-up meetings with mental health practitioners. The ACT data corroborates the facility's written policy and demonstrates implementation of referral requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures requiring referral to mental health services when screening results indicate prior sexually abusive behavior. These procedures support clinical assessment and appropriate treatment interventions. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.381(b). 115.381(c) Policy Review and Analysis This provision establishes the following requirement: any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical Services Procedures., Mental Health Services Procedures., Medical and mental-health screening procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Information related to sexual victimization or abusiveness shall be strictly limited to medical and mental health practitioners and other staff as necessary to make treatment, security, and management decisions." This policy establishes confidentiality protections governing sensitive information obtained during PREA screening activities. The policy supports resident privacy while allowing staff to make informed supervision, treatment, and safety decisions. ACT/PAQ Review The Auditor reviewed confidentiality procedures, screening documentation, and ACT responses applicable to this provision. ACT responses indicate information related to sexual victimization and abusiveness is shared only with staff who have a legitimate need to know. The ACT data corroborates the facility's written procedures and demonstrates implementation of confidentiality protections consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides limits access to screening

information and maintains procedures intended to protect the confidentiality of sensitive resident information.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.381(c).

115.381(d)

Policy Review and Analysis

This provision establishes the following requirement: medical and mental health practitioners shall obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical Services Procedures., Mental Health Services Procedures., Medical and mental-health screening procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation.

ACT/PAQ Review

The ACT/PAQ response for Standard 115.381 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation.

Documentation Review

Clinical follow-up procedures and the mental-health memorandum address required referrals and informed-consent limits.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.381(d).

Auditor Analysis and Determination

Screening procedures, the mental-health follow-up memorandum, medical and mental-health questionnaires, and records demonstrated referral for clinical follow-up when screening reveals prior victimization or prior perpetration. No reviewed record showed a missed required referral.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.381.

Standard Finding

Meets Standard

115.382	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.382 - Access to emergency medical and mental health services Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Sexual Assault Coordinated Response Plan. - Medical Services Procedures. - Mental Health Services Procedures. - Medical policy. - Hasbro Children's Hospital/Aubin Center information. - Day One MOU. - Random staff interviews. - Ocean Tides ACT/PAQ responses for Standard 115.382. - Medical Services Policy - Coordinated Response Plan - SAFE/SANE information - Medical and mental-health questionnaires Provision Analysis 115.382(a) Policy Review and Analysis This provision establishes the following requirement: 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. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Medical Services Procedures., Mental Health Services Procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Victims of sexual abuse shall receive timely, unimpeded access to emergency

	medical treatment and crisis intervention services." This policy establishes the facility's responsibility to ensure residents who experience sexual abuse receive immediate access to necessary medical and mental health care. The policy emphasizes prompt intervention and access to services designed to address the physical and emotional effects of sexual abuse. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, Sexual Assault Coordinated Response Plan, medical and mental health procedures, and ACT responses applicable to this provision. ACT responses indicate victims of sexual abuse receive timely and unimpeded access to emergency medical treatment and crisis intervention services. The ACT data corroborates the facility's written policy and demonstrates implementation of emergency response requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures governing emergency medical treatment, crisis intervention services, referrals, and coordination with outside medical providers when necessary. The documentation reviewed supports the facility's efforts to ensure residents receive timely access to care. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.382(a). 115.382(b) Policy Review and Analysis This provision establishes the following requirement: if no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, staff first responders shall take preliminary steps to protect the victim pursuant to § 115.362 and shall immediately notify the appropriate medical and mental health practitioners. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Medical Services Procedures., Mental Health Services Procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address access to emergency medical and mental health services and establish the expected practice applicable to 115.382(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed medical procedures, mental health procedures, and ACT responses applicable to this provision. ACT responses indicate treatment medical and mental health practitioners make decisions. The ACT data corroborates the

	facility's procedures and demonstrates implementation of clinical decision-making practices consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that treatment decisions are made by qualified medical and mental health practitioners in accordance with professional standards and individual resident needs. These procedures support appropriate clinical decision-making and individualized care. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.382(b). 115.382(c) Policy Review and Analysis This provision establishes the following requirement: 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. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Medical Services Procedures., Mental Health Services Procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address access to emergency medical and mental health services and establish the expected practice applicable to 115.382(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed medical procedures, resident services documentation, and ACT responses applicable to this provision. ACT responses indicate services are provided without financial cost to the resident. The ACT data corroborates the facility's written procedures and demonstrates implementation of resident protections consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides has established procedures ensuring residents are not financially responsible for emergency medical treatment or crisis intervention services related to sexual abuse. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.382(c). 115.382(d) Policy Review and Analysis

	This provision establishes the following requirement: treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Sexual Assault Coordinated Response Plan., Medical Services Procedures., Mental Health Services Procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.382 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review Emergency care procedures provide timely services without financial cost. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.382(d). Auditor Analysis and Determination Medical procedures, the coordinated-response plan, SAFE/SANE information, and clinical questionnaires established immediate, unimpeded access to emergency medical and crisis-intervention services without financial cost. No audit-period incident required emergency treatment. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.382. Standard Finding Meets Standard

115.383	**Ongoing medical and mental health care for sexual abuse victims and abusers**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.383 - Ongoing medical and mental health care for sexual abuse

	victims and abusers Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Medical Services Procedures. - Mental Health Services Procedures. - Treatment Planning Documentation. - Medical and mental-health policies. - Medical and mental-health questionnaires. - Ocean Tides ACT/PAQ responses for Standard 115.383. - Medical Services Policy - Mental-health services information - Medical and mental-health questionnaires Provision Analysis 115.383(a) Policy Review and Analysis This provision establishes the following requirement: the facility shall offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical Services Procedures., Mental Health Services Procedures., Treatment Planning Documentation.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Victims of sexual abuse shall receive ongoing medical and mental health care consistent with community standards of care." This policy establishes the facility's responsibility to ensure residents who experience sexual abuse have access to continuing treatment and support services. The policy recognizes that the effects of sexual abuse may require ongoing intervention beyond the immediate crisis period. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, medical and mental health procedures, treatment planning documentation, and ACT responses applicable to this provision. ACT responses indicate ongoing medical and mental health evaluation and treatment are available to victims of sexual abuse. The ACT data corroborates the facility's written policy and demonstrates implementation of

	continuing care requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides provides access to medical and mental health services designed to address the ongoing needs of residents who experience sexual abuse. Treatment procedures reviewed by the Auditor support assessment, referral, counseling, and continuing care when indicated. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.383(a). 115.383(b) Policy Review and Analysis This provision establishes the following requirement: the evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical Services Procedures., Mental Health Services Procedures., Treatment Planning Documentation.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address ongoing medical and mental health care for sexual abuse victims and abusers and establish the expected practice applicable to 115.383(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed treatment procedures, clinical documentation, and ACT responses applicable to this provision. ACT responses indicate treatment services are consistent with the community standard of care. The ACT data corroborates the facility's treatment practices and demonstrates implementation of service requirements consistent with PREA standards. Documentation Review Documentation reviewed demonstrates that Ocean Tides provides services consistent with professional standards and individualized treatment planning. Medical and mental health interventions are designed to address the specific needs of residents receiving services. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.383(b). 115.383(c) Policy Review and Analysis

	This provision establishes the following requirement: the facility shall provide such victims with medical and mental health services consistent with the community level of care. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical Services Procedures., Mental Health Services Procedures., Treatment Planning Documentation.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address ongoing medical and mental health care for sexual abuse victims and abusers and establish the expected practice applicable to 115.383(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed mental health procedures, treatment documentation, and ACT responses applicable to this provision. ACT responses indicate mental health services are available to residents who have committed sexual abuse when clinically appropriate. The ACT data corroborates the facility's procedures and demonstrates implementation of treatment opportunities consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides provides access to mental health services for residents who have engaged in sexually abusive behavior when clinically appropriate. These services support assessment, treatment planning, and behavior change interventions. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.383(c). 115.383(d) Policy Review and Analysis This provision establishes the following requirement: resident victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical Services Procedures., Mental Health Services Procedures., Treatment Planning Documentation.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address ongoing medical and mental health care for sexual abuse victims and abusers and establish the expected practice applicable to 115.383(d). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review

	The Ocean Tides ACT/PAQ response for Standard 115.383 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Medical and mental-health policies, Medical and mental-health questionnaires. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.383(d). 115.383(e) Policy Review and Analysis This provision establishes the following requirement: if pregnancy results from the conduct described in paragraph (d) of this section, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancyrelated medical services. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical Services Procedures., Mental Health Services Procedures., Treatment Planning Documentation.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address ongoing medical and mental health care for sexual abuse victims and abusers and establish the expected practice applicable to 115.383(e). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.383 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Medical and mental-health policies, Medical and mental-health questionnaires. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.383(e). 115.383(f) Policy Review and Analysis This provision establishes the following requirement: resident victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate. Ocean Tides' written framework for this provision includes

	Ocean Tides PREA Compliance Policy., Medical Services Procedures., Mental Health Services Procedures., Treatment Planning Documentation.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.383 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The medical-services framework addresses continuing care, testing, treatment, pregnancy-related services when applicable, and no-cost access. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.383(f). 115.383(g) Policy Review and Analysis This provision establishes the following requirement: treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical Services Procedures., Mental Health Services Procedures., Treatment Planning Documentation.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.383 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The medical-services framework addresses continuing care, testing, treatment, pregnancy-related services when applicable, and no-cost access. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.383(g). 115.383(h)

	Policy Review and Analysis This provision establishes the following requirement: the facility shall attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Medical Services Procedures., Mental Health Services Procedures., Treatment Planning Documentation.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.383 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The medical-services framework addresses continuing care, testing, treatment, pregnancy-related services when applicable, and no-cost access. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.383(h). Auditor Analysis and Determination Medical and mental-health policies provide ongoing evaluation and treatment, testing and prophylaxis when clinically appropriate, pregnancy-related services when applicable, and treatment without financial cost. No audit-period sexual-abuse victim or perpetrator required services under this standard. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.383. Standard Finding Meets Standard

115.386	**Sexual abuse incident reviews**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.386 - Sexual abuse incident reviews

Evidence Reviewed

- Ocean Tides PREA Compliance Policy.

- Sexual Abuse Incident Review Documentation.

- Incident Review Procedures.

- Data Collection Part Two showing one unfounded youth-on-youth sexual-harassment allegation.

- Incident Review Team questionnaire.

- Ocean Tides ACT/PAQ responses for Standard 115.386.

- Incident Review Team questionnaire

- PREA Compliance Policy

- Data Collection Part Two

- Exit Meeting Agenda

- RSAS-106 Exit Meeting Agenda for Ocean Tides

Provision Analysis

115.386(a)

Policy Review and Analysis

This provision establishes the following requirement: the facility shall conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Incident Review Procedures., PREA Compliance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "A sexual abuse incident review shall be conducted at the conclusion of every sexual abuse investigation unless the allegation has been determined to be unfounded." This policy establishes the facility's responsibility to conduct structured reviews following investigations involving sexual abuse. The policy supports organizational learning and continuous improvement of PREA-related practices.

ACT/PAQ Review

The Auditor reviewed the Ocean Tides PREA Compliance Policy, incident review procedures, review documentation, and ACT responses applicable to this provision. ACT responses indicate sexual abuse incident reviews are conducted following completed investigations. The ACT data corroborates the facility's written policy and

demonstrates implementation of incident review requirements.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides has established procedures governing sexual abuse incident reviews and identifies responsibilities for conducting and documenting review activities. The only audit-period allegation was youth-on-youth sexual harassment and was determined unfounded. The provision does not require a sexual-abuse incident review for that case.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.386(a).

115.386(b)

Policy Review and Analysis

This provision establishes the following requirement: such review shall ordinarily occur within 30 days of the conclusion of the investigation. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Incident Review Procedures., PREA Compliance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "The review team shall include upper-level management officials and other staff as appropriate." This policy establishes requirements regarding participation in the incident review process and ensures review activities include individuals capable of evaluating facility operations, staffing, supervision, and safety concerns.

ACT/PAQ Review

The Auditor reviewed incident review procedures, review documentation, and ACT responses applicable to this provision. ACT responses indicate incident review teams include upper-level management officials. The ACT data corroborates the facility's written procedures and demonstrates implementation of review team requirements.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides has established procedures identifying participants and responsibilities associated with incident review activities. Data Collection Part Two reports one youth-on-youth sexual-harassment allegation, administratively investigated and determined unfounded; therefore, a sexual-abuse incident review was not required.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.386(b).

115.386(c)

Policy Review and Analysis

	This provision establishes the following requirement: the review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Incident Review Procedures., PREA Compliance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address sexual abuse incident reviews and establish the expected practice applicable to 115.386(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed incident review documentation and ACT responses applicable to this provision. ACT responses indicate recommendations are developed to improve prevention, detection, and response efforts. The ACT data corroborates the facility's review practices and demonstrates implementation of quality improvement measures consistent with PREA requirements. Documentation Review Documentation reviewed demonstrates that incident reviews evaluate contributing factors, staffing considerations, monitoring practices, physical plant concerns, and other factors relevant to resident safety. These reviews support continuous improvement efforts and identification of corrective actions when necessary. Data Collection Part Two reports one youth-on-youth sexual-harassment allegation, administratively investigated and determined unfounded; therefore, a sexual-abuse incident review was not required. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.386(c). 115.386(d) Policy Review and Analysis This provision establishes the following requirement: the review team shall, including the enumerated elements stated in the provision. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Incident Review Procedures., PREA Compliance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The current DOJ audit instrument identifies this provision as no longer applicable to the compliance finding. ACT/PAQ Review The ACT/PAQ treatment of this provision was reviewed as contextual information only.

	Documentation Review No separate implementation determination is required for this provision under the current audit instrument. These provisions are no longer applicable to the compliance finding. Data Collection Part Two reports one youth-on-youth sexual-harassment allegation, administratively investigated and determined unfounded; therefore, a sexual-abuse incident review was not required. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.386(d). 115.386(e) Policy Review and Analysis This provision establishes the following requirement: the facility shall implement the recommendations for improvement or shall document its reasons for not doing so. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Incident Review Procedures., PREA Compliance Policy. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address sexual abuse incident reviews and establish the expected practice applicable to 115.386(e). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.386 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Data Collection Part Two showing one unfounded youth-on-youth sexual-harassment allegation, Incident Review Team questionnaire. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.386(e). Auditor Analysis and Determination Data Collection Part Two identifies one youth-on-youth sexual-harassment allegation that was administratively investigated and determined unfounded, and no sexual-abuse allegation. Because the only audit-period matter was unfounded sexual harassment, a sexual-abuse incident review was not required. The Incident Review Team questionnaire and policy establish the process for a qualifying substantiated or unsubstantiated sexual-abuse investigation. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.386.

	Standard Finding Meets Standard

115.387	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.387 - Data collection Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Annual PREA Statistical Reports. - Data Collection Procedures. - Data Collection Part One. - Data Collection Part Two. - Annual PREA reports. - Ocean Tides ACT/PAQ responses for Standard 115.387. - Data Collection Parts One and Two - Annual PREA reports - Survey of Sexual Victimization materials - PREA incident records - RSAS-106 Exit Meeting Agenda for Ocean Tides Provision Analysis 115.387(a) Policy Review and Analysis This provision establishes the following requirement: the agency shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Data Collection Procedures.. The written requirements were treated as the agency's

	expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Ocean Tides shall collect accurate, uniform data for every allegation of sexual abuse and sexual harassment." This policy establishes the facility's responsibility to collect and maintain PREA-related data for reporting, analysis, and quality improvement purposes. The policy supports accountability and evaluation of the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. ACT/PAQ Review The Auditor reviewed the Ocean Tides PREA Compliance Policy, data collection procedures, statistical reports, and ACT responses applicable to this provision. ACT responses indicate data is collected for every allegation of sexual abuse and sexual harassment. The ACT data corroborates the facility's written policy and demonstrates implementation of data collection requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides maintains procedures governing data collection and reporting associated with PREA allegations. Statistical reports reviewed by the Auditor support implementation of systematic data collection practices. The controlling audit-period totals are zero sexual-abuse allegations and one youth-on-youth sexual-harassment allegation, administratively investigated and determined unfounded. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.387(a). 115.387(b) Policy Review and Analysis This provision establishes the following requirement: the agency shall aggregate the incident-based sexual abuse data at least annually. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Data Collection Procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address data collection and establish the expected practice applicable to 115.387(b). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Auditor reviewed data collection procedures, annual reports, and ACT responses applicable to this provision. ACT responses indicate data collection practices are consistent with PREA requirements and that data is maintained for reporting and analysis purposes. The ACT data corroborates the facility's procedures and demonstrates implementation of data management requirements consistent with

PREA standards.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides utilizes collected data for reporting and analysis purposes and maintains records necessary to support PREA reporting obligations. The procedures reviewed support consistency and accuracy in PREA-related data management.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.387(b).

115.387(c)

Policy Review and Analysis

This provision establishes the following requirement: 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. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Data Collection Procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address data collection and establish the expected practice applicable to 115.387(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Ocean Tides ACT/PAQ response for Standard 115.387 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof.

Documentation Review

Relevant evidence included Data Collection Part One, Data Collection Part Two, Annual PREA reports.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.387(c).

115.387(d)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Data Collection Procedures. The written requirements were treated as the

	agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.387 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review Data Collection Parts One and Two and annual reports supported incident-level data collection, annual aggregation, and response to governmental data requests. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.387(d). 115.387(e) Policy Review and Analysis This provision establishes the following requirement: the agency also shall obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Data Collection Procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.387 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review Data Collection Parts One and Two and annual reports supported incident-level data collection, annual aggregation, and response to governmental data requests. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.387(e). 115.387(f) Policy Review and Analysis This provision establishes the following requirement: upon request, the agency shall

	provide all such data from the previous calendar year to the Department of Justice no later than June 30. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Data Collection Procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.387 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review Data Collection Parts One and Two and annual reports supported incident-level data collection, annual aggregation, and response to governmental data requests. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.387(f). Auditor Analysis and Determination Data Collection Part Two was used as the controlling allegation source. It reports zero sexual-abuse allegations and one youth-on-youth sexual-harassment allegation, administratively investigated and determined unfounded. Annual reports and incident records demonstrated standardized collection and aggregation. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.387. Standard Finding Meets Standard

115.388	**Data review for corrective action**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.388 - Data review for corrective action Evidence Reviewed - Ocean Tides PREA Compliance Policy.

	- Annual PREA Statistical Reports. - PREA Data Review Documentation. - Annual Staffing Plan Assessments. - Annual PREA reports. - Annual staffing-plan assessments. - Public website review. - Ocean Tides ACT/PAQ responses for Standard 115.388. - Annual PREA reports for 2019-2025 - Annual data-review records - Agency Head questionnaire - Public website review Provision Analysis 115.388(a) Policy Review and Analysis This provision establishes the following requirement: the agency shall review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including: (1) Identifying problem areas; (2) Taking corrective action on an ongoing basis; and (3) Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Annual Staffing Plan Assessments., Annual staffing-plan assessments.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "On at least an annual basis, Ocean Tides shall review data collected and aggregated pursuant to PREA standards in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training." This policy establishes the facility's responsibility to conduct an annual review of PREA-related data and use the information to evaluate the effectiveness of its prevention, detection, reporting, investigation, and response efforts. The policy recognizes the importance of data analysis as a management tool for identifying trends, evaluating performance, and improving resident safety. ACT/PAQ Review

	The Auditor reviewed the Ocean Tides PREA Compliance Policy, annual PREA statistical reports, data review documentation, Annual Staffing Plan Assessments, and ACT responses applicable to this provision. ACT responses indicate that aggregated sexual abuse data is reviewed at least annually and used to assess and improve the effectiveness of sexual abuse prevention, detection, and response efforts. The ACT data corroborates the facility's written policy and demonstrates implementation of annual data review requirements consistent with PREA standards. Documentation Review Documentation reviewed demonstrates that Ocean Tides conducts annual reviews of PREA-related information through statistical reporting, staffing plan assessments, and other management review processes. The documentation reviewed supports the facility's efforts to identify potential areas for improvement and evaluate the effectiveness of existing practices and procedures. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.388(a). 115.388(b) Policy Review and Analysis This provision establishes the following requirement: 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 the agency's progress in addressing sexual abuse. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Annual Staffing Plan Assessments., Annual staffing-plan assessments.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy requires the facility to utilize collected data to identify problem areas, evaluate corrective actions, and improve sexual abuse prevention efforts. ACT/PAQ Review The Auditor reviewed annual PREA reports, data review documentation, and ACT responses applicable to this provision. ACT responses indicate that corrective actions are identified when appropriate and that data is used to improve policies, practices, and training. The ACT data corroborates the facility's data review process and demonstrates implementation of corrective-action requirements. Documentation Review Documentation reviewed demonstrates that Ocean Tides evaluates collected information to identify trends, assess staffing and supervision practices, evaluate monitoring systems, and determine whether modifications to policies, procedures, training, or operational practices are necessary. The review process supports

continuous improvement and organizational accountability.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.388(b).

115.388(c)

Policy Review and Analysis

This provision establishes the following requirement: the agency's report shall be approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Annual Staffing Plan Assessments., Annual staffing-plan assessments.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address data review for corrective action and establish the expected practice applicable to 115.388(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Auditor reviewed annual PREA reports, statistical summaries, and ACT responses applicable to this provision. ACT responses indicate that annual reports are prepared based upon the review of collected data. The ACT data corroborates the facility's reporting practices and demonstrates implementation of annual reporting requirements consistent with PREA standards.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides prepares annual reports summarizing PREA-related data and analysis. These reports support management review, accountability, and evaluation of facility performance regarding sexual abuse prevention, detection, and response.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.388(c).

115.388(d)

Policy Review and Analysis

This provision establishes the following requirement: the agency may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility, but must indicate the nature of the material redacted. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., Annual Staffing Plan Assessments., Annual staffing-plan assessments.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and

	file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.388 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review Annual reports were approved and published with appropriate redaction. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.388(d). Auditor Analysis and Determination Annual PREA reports, data-review materials, leadership responses, and website review demonstrated annual analysis of sexual-safety data, identification of improvement needs, leadership approval, and public reporting. No personally identifying information was observed in the public reports. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.388. Standard Finding Meets Standard

115.389	**Data storage, publication, and destruction**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.389 - Data storage, publication, and destruction Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Annual PREA Reports. - PREA Data Collection and Retention Procedures. - Ocean Tides Website.

- Annual PREA reports and public website.

- Data-storage and retention procedures.

- Ocean Tides ACT/PAQ responses for Standard 115.389.

- Annual PREA reports

- Public website review

- Records-retention and confidentiality policies

Provision Analysis

115.389(a)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall ensure that data collected pursuant to § 115.387 are securely retained. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., PREA Data Collection and Retention Procedures., Data-storage and retention procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy states: "Ocean Tides shall securely retain, maintain, and store data collected pursuant to PREA standards." This policy establishes the facility's responsibility to maintain PREA-related information in a secure manner that protects the integrity of collected data while supporting reporting and analysis requirements. The policy recognizes the importance of maintaining accurate records associated with allegations of sexual abuse and sexual harassment.

ACT/PAQ Review

The Auditor reviewed the Ocean Tides PREA Compliance Policy, data retention procedures, annual PREA reports, and ACT responses applicable to this provision. ACT responses indicate PREA-related data is securely retained. The ACT data corroborates the facility's written procedures and demonstrates implementation of data storage requirements consistent with PREA standards.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides has established procedures governing the retention and storage of PREA-related information. The documentation reviewed supports the facility's efforts to maintain records necessary to satisfy PREA reporting, review, and audit requirements.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.389(a).

115.389(b)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., PREA Data Collection and Retention Procedures., Data-storage and retention procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy requires the publication of annual PREA information following appropriate review and approval processes.

ACT/PAQ Review

The Auditor reviewed annual PREA reports, website materials, and ACT responses applicable to this provision. ACT responses indicate annual PREA reports are made available to the public. The ACT data corroborates the facility's publication practices and demonstrates implementation of public reporting requirements.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides publishes PREA-related reports and information through publicly available resources. The Ocean Tides website reviewed by the Auditor contains PREA-related information available to residents, families, stakeholders, and members of the public.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.389(b).

115.389(c)

Policy Review and Analysis

This provision establishes the following requirement: before making aggregated sexual abuse data publicly available, the agency shall remove all personal identifiers. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., PREA Data Collection and Retention Procedures., Data-storage and retention procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address data storage, publication, and destruction and establish the expected practice applicable to 115.389(c). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Auditor reviewed annual PREA reports, publication procedures, and ACT

responses applicable to this provision. ACT responses indicate personal identifiers are removed before data is published. The ACT data corroborates the facility's written procedures and demonstrates implementation of confidentiality protections associated with public reporting requirements.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides removes personal identifying information prior to publication of PREA-related reports and statistical information. These procedures support transparency while protecting resident privacy and confidentiality.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.389(c).

115.389(d)

Policy Review and Analysis

This provision establishes the following requirement: the agency shall maintain sexual abuse data collected pursuant to § 115.387 for at least 10 years after the date of its initial collection unless Federal, State, or local law requires otherwise. Ocean Tides' written framework for this provision includes Ocean Tides PREA Compliance Policy., PREA Data Collection and Retention Procedures., Data-storage and retention procedures.. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The PREA Compliance Policy requires PREA-related records and data to be maintained in accordance with applicable retention requirements. Bottom of Form

ACT/PAQ Review

The Auditor reviewed data retention procedures, annual PREA reports, and ACT responses applicable to this provision. ACT responses indicate PREA-related data is retained in accordance with PREA requirements. The ACT data corroborates the facility's retention practices and demonstrates implementation of data retention requirements consistent with PREA standards.

Documentation Review

Documentation reviewed demonstrates that Ocean Tides maintains procedures governing retention and preservation of PREA-related information for the timeframes required by PREA standards. The documentation reviewed supports long-term availability of information necessary for reporting, trend analysis, corrective action review, and future audits.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.389(d).

	Auditor Analysis and Determination Annual reports, website review, confidentiality procedures, and retention practices demonstrated secure storage, publication of aggregated data, removal of personal identifiers, and retention consistent with the required period. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.389. Standard Finding Meets Standard

115.401	**Frequency and scope of audits**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.401 - Frequency and scope of audits Evidence Reviewed - Notice of Audit posted in English and Spanish on May 25, 2026. - Entrance and exit attendance records. - Full facility access, document access, and private interviews. - Onsite observation and testing records. - Ocean Tides ACT/PAQ responses for Standard 115.401. - English- and Spanish-language audit notices posted May 25, 2026 - Entrance and exit attendance records - Private staff and youth interviews - Facility tour and access to requested records Provision Analysis 115.401(a) Policy Review and Analysis This provision establishes the following requirement: during the three-year period starting on August 20, 2013, and during each three- year period thereafter, the

	agency shall ensure that each facility operated by the agency, or by a private organization on behalf of the agency, is audited at least once. Ocean Tides' written framework for this provision includes the PREA Compliance Policy and related operating procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. Agency audit-cycle information and public records were reviewed for context. ACT/PAQ Review The ACT identifies the response as informational and states that it does not independently control the facility compliance finding. Documentation Review Prior audit reports and public website information were reviewed. This provision is informational and does not independently affect the compliance finding. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.401(a). 115.401(b) Policy Review and Analysis This provision establishes the following requirement: during each one-year period starting on August 20, 2013, the agency shall ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, is audited. Ocean Tides' written framework for this provision includes the PREA Compliance Policy and related operating procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. Agency audit-cycle information and public records were reviewed for context. ACT/PAQ Review The ACT identifies the response as informational and states that it does not independently control the facility compliance finding. Documentation Review Prior audit reports and public website information were reviewed. This provision is informational and does not independently affect the compliance finding. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.401(b). 115.401(c)

	Policy Review and Analysis This provision establishes the following requirement: the Department of Justice may send a recommendation to an agency for an expedited audit if the Department has reason to believe that a particular facility may be experiencing problems relating to sexual abuse. The recommendation may also include referrals to resources that may assist the agency with PREA-related issues. Ocean Tides' written framework for this provision includes the PREA Compliance Policy and related operating procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.401 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The audit process provided unrestricted access, private interviews, confidential correspondence, and review of requested evidence. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.401(c). 115.401(d) Policy Review and Analysis This provision establishes the following requirement: the Department of Justice shall develop and issue an audit instrument that will provide guidance on the conduct of and contents of the audit. Ocean Tides' written framework for this provision includes the PREA Compliance Policy and related operating procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.401 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The audit process provided unrestricted access, private interviews, confidential correspondence, and review of requested evidence.

	Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.401(d). 115.401(e) Policy Review and Analysis This provision establishes the following requirement: the agency shall bear the burden of demonstrating compliance with the standards. Ocean Tides' written framework for this provision includes the PREA Compliance Policy and related operating procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.401 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The audit process provided unrestricted access, private interviews, confidential correspondence, and review of requested evidence. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.401(e). 115.401(f) Policy Review and Analysis This provision establishes the following requirement: the auditor shall review all relevant agency-wide policies, procedures, reports, internal and external audits, and accreditations for each facility type. Ocean Tides' written framework for this provision includes the PREA Compliance Policy and related operating procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.401 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review

	The audit process provided unrestricted access, private interviews, confidential correspondence, and review of requested evidence. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.401(f). 115.401(g) Policy Review and Analysis This provision establishes the following requirement: the audits shall review, at a minimum, a sampling of relevant documents and other records and information for the most recent one-year period. Ocean Tides' written framework for this provision includes the PREA Compliance Policy and related operating procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.401 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The audit process provided unrestricted access, private interviews, confidential correspondence, and review of requested evidence. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.401(g). 115.401(h) Policy Review and Analysis This provision establishes the following requirement: the auditor shall have access to, and shall observe, all areas of the audited facilities. Ocean Tides' written framework for this provision includes the PREA Compliance Policy and related operating procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address frequency and scope of audits and establish the expected practice applicable to 115.401(h). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.401 was reviewed as

corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof.

Documentation Review

Relevant evidence included Notice of Audit posted in English and Spanish on May 25, 2026, Entrance and exit attendance records, Full facility access, document access, and private interviews, Onsite observation and testing records. The auditor had access to and observed all areas of the facility, including the single housing area, private bedrooms, showers, restrooms, education and program areas, staff posts, and reporting locations.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.401(h).

115.401(i)

Policy Review and Analysis

This provision establishes the following requirement: the auditor shall be permitted to request and receive copies of any relevant documents (including electronically stored information). Ocean Tides' written framework for this provision includes the PREA Compliance Policy and related operating procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address frequency and scope of audits and establish the expected practice applicable to 115.401(i). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Ocean Tides ACT/PAQ response for Standard 115.401 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof.

Documentation Review

Relevant evidence included Notice of Audit posted in English and Spanish on May 25, 2026, Entrance and exit attendance records, Full facility access, document access, and private interviews, Onsite observation and testing records. The facility provided requested paper and electronic records before and during the onsite audit.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.401(i).

115.401(j)

Policy Review and Analysis

This provision establishes the following requirement: the auditor shall retain and

preserve all documentation, including video recordings and interview notes, relied upon in making audit determinations. Such documentation shall be provided to the Department of Justice upon request. Ocean Tides' written framework for this provision includes the PREA Compliance Policy and related operating procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation.

ACT/PAQ Review

The ACT/PAQ response for Standard 115.401 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation.

Documentation Review

The audit process provided unrestricted access, private interviews, confidential correspondence, and review of requested evidence.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.401(j).

115.401(k)

Policy Review and Analysis

This provision establishes the following requirement: the auditor shall interview a representative sample of inmates, residents, and detainees, and of staff, supervisors, and administrators. Ocean Tides' written framework for this provision includes the PREA Compliance Policy and related operating procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation.

ACT/PAQ Review

The ACT/PAQ response for Standard 115.401 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation.

Documentation Review

The audit process provided unrestricted access, private interviews, confidential correspondence, and review of requested evidence.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.401(k).

115.401(l)

	Policy Review and Analysis This provision establishes the following requirement: the auditor shall review a sampling of any available video recordings and other electronically available data that may be relevant to the provisions being audited. Ocean Tides' written framework for this provision includes the PREA Compliance Policy and related operating procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. ACT/PAQ Review The ACT/PAQ response for Standard 115.401 was reviewed and compared with the supporting records, completed questionnaires, onsite observations, interview results, and testing applicable to this provision. The response was used as corroborative information and not as independent proof of implementation. Documentation Review The audit process provided unrestricted access, private interviews, confidential correspondence, and review of requested evidence. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.401(l). 115.401(m) Policy Review and Analysis This provision establishes the following requirement: the auditor shall be permitted to conduct private interviews with residents. Ocean Tides' written framework for this provision includes the PREA Compliance Policy and related operating procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address frequency and scope of audits and establish the expected practice applicable to 115.401(m). Policy was treated as the agency's stated expectation, not as independent proof of implementation. ACT/PAQ Review The Ocean Tides ACT/PAQ response for Standard 115.401 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof. Documentation Review Relevant evidence included Notice of Audit posted in English and Spanish on May 25, 2026, Entrance and exit attendance records, Full facility access, document access, and private interviews, Onsite observation and testing records. Six random

and four targeted youth interviews were completed privately. One additional random youth and one additional targeted youth declined to participate.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.401(m).

115.401(n)

Policy Review and Analysis

This provision establishes the following requirement: residents shall be permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel. Ocean Tides' written framework for this provision includes the PREA Compliance Policy and related operating procedures. The written requirements were treated as the agency's expected practice and were tested against records, interviews, observations, live testing, and file-review evidence rather than accepted as stand-alone proof of implementation. The facility's PREA policy and related procedures address frequency and scope of audits and establish the expected practice applicable to 115.401(n). Policy was treated as the agency's stated expectation, not as independent proof of implementation.

ACT/PAQ Review

The Ocean Tides ACT/PAQ response for Standard 115.401 was reviewed as corroborative evidence. The response was compared with policy, records, questionnaires, and onsite verification rather than accepted as standalone proof.

Documentation Review

Relevant evidence included Notice of Audit posted in English and Spanish on May 25, 2026, Entrance and exit attendance records, Full facility access, document access, and private interviews, Onsite observation and testing records. English- and Spanish-language Notices of Audit were posted on May 25, 2026. The notice provided confidential correspondence instructions and remained visible during the onsite audit.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.401(n).

Auditor Analysis and Determination

The Auditor received access to all requested areas, records, electronically stored information, staff, volunteers, contractors, and youth. Interviews were conducted privately. English- and Spanish-language audit notices were posted on May 25, 2026, more than six weeks before the onsite review. No restriction on audit access was identified.

Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.401.

	Standard Finding Meets Standard

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Standard 115.403 - Audit contents and findings Evidence Reviewed - Ocean Tides PREA Compliance Policy. - Ocean Tides ACT/PAQ response for Standard 115.403(f). - Ocean Tides Child Safety webpage. - Prior final PREA audit reports published on the Ocean Tides website. Provision Analysis 115.403(f) Policy Review and Analysis Standard 115.403(f) requires the agency to ensure that the auditor's final report is published on the agency's website, when one exists, or is otherwise made readily available to the public. Ocean Tides' PREA Compliance Policy and public Child Safety webpage establishes the agency's process for making PREA information and final audit reports publicly available. The written framework was treated as the agency's expected practice and was evaluated against the live website and the agency's publication history. ACT/PAQ Review The Ocean Tides ACT/PAQ identified the Child Safety webpage as the public location for PREA information and final audit reports. The response was used as corroborative evidence and was verified through direct review of the webpage. Documentation Review The Auditor reviewed the Ocean Tides Child Safety webpage and confirmed that prior final PREA audit reports were publicly accessible. The current final report cannot be posted until it is issued. Ocean Tides is responsible for publishing this final report on its website after issuance so that it remains readily available to the public.

	Based on the agency's established public webpage, the availability of prior final PREA audit reports, and the requirement to publish the current report after issuance, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of provision 115.403(f). Auditor Analysis and Determination Only provision 115.403(f) is reported under this standard. Direct review of the Ocean Tides Child Safety webpage confirmed that the agency maintains a public location for PREA information and has published prior final PREA audit reports. Following issuance, the agency must publish this final report on the same website or otherwise make it readily available to the public. Based on the totality of the evidence, the Auditor determined that Ocean Tides School - Narragansett Campus meets the requirements of Standard 115.403, provision (f). Standard Finding Meets Standard

Appendix: Provision Findings		
115.311 (a)	**Zero tolerance of sexual abuse and sexual harassment; PREA coordinator**	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.311 (b)	**Zero tolerance of sexual abuse and sexual harassment; PREA coordinator**	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
115.311 (c)	**Zero tolerance of sexual abuse and sexual harassment; PREA coordinator**	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
115.312 (a)	**Contracting with other entities for the confinement of residents**	
	If this agency is public and it contracts for the confinement of its residents with private agencies or other entities including other government agencies, has the agency included the entity's obligation to adopt and comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)	yes
115.312 (b)	**Contracting with other entities for the confinement of residents**	

	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents OR the response to 115.312(a)-1 is "NO".)	yes
115.313 (a)	**Supervision and monitoring**	
	Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility has implemented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility has documented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility’s staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	Does the agency ensure that each facility’s staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Generally accepted juvenile detention and correctional/secure residential practices?	yes
	Does the agency ensure that each facility’s staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any judicial findings of inadequacy?	yes
	Does the agency ensure that each facility’s staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any findings of inadequacy from Federal investigative agencies?	yes
	Does the agency ensure that each facility’s staffing plan takes into consideration the 11 criteria below in calculating adequate	yes

	staffing levels and determining the need for video monitoring: Any findings of inadequacy from internal or external oversight bodies?	
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: All components of the facility's physical plant (including "blind-spots" or areas where staff or residents may be isolated)?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The composition of the resident population?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The number and placement of supervisory staff?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Institution programs occurring on a particular shift?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any applicable State or local laws, regulations, or standards?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any other relevant factors?	yes
115.313 (b)	**Supervision and monitoring**	
	Does the agency comply with the staffing plan except during limited and discrete exigent circumstances?	yes
	In circumstances where the staffing plan is not complied with, does the facility fully document all deviations from the plan? (N/A if no deviations from staffing plan.)	na
115.313 (c)	**Supervision and monitoring**	
	Does the facility maintain staff ratios of a minimum of 1:8 during resident waking hours, except during limited and discrete exigent circumstances? (N/A only until October 1, 2017.)	yes

	Does the facility maintain staff ratios of a minimum of 1:16 during resident sleeping hours, except during limited and discrete exigent circumstances? (N/A only until October 1, 2017.)	yes
	Does the facility fully document any limited and discrete exigent circumstances during which the facility did not maintain staff ratios? (N/A only until October 1, 2017.)	yes
	Does the facility ensure only security staff are included when calculating these ratios? (N/A only until October 1, 2017.)	yes
	Is the facility obligated by law, regulation, or judicial consent decree to maintain the staffing ratios set forth in this paragraph?	yes
115.313 (d)	**Supervision and monitoring**	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: Prevailing staffing patterns?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility’s deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.313 (e)	**Supervision and monitoring**	
	Has the facility implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment? (N/A for non-secure facilities)	yes
	Is this policy and practice implemented for night shifts as well as day shifts? (N/A for non-secure facilities)	yes
	Does the facility have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational	yes

	functions of the facility? (N/A for non-secure facilities)	
115.315 (a)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.315 (b)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from conducting cross-gender pat-down searches in non-exigent circumstances?	yes
115.315 (c)	**Limits to cross-gender viewing and searches**	
	Does the facility document and justify all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches?	yes
115.315 (d)	**Limits to cross-gender viewing and searches**	
	Does the facility implement policies and procedures that 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 or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering a resident housing unit?	yes
	In facilities (such as group homes) that do not contain discrete housing units, does the facility require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing? (N/A for facilities with discrete housing units)	yes
115.315 (e)	**Limits to cross-gender viewing and searches**	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.315 (f)	**Limits to cross-gender viewing and searches**	

	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.316 (a)	**Residents with disabilities and residents who are limited English proficient**	
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other? (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with residents who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes

	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Who are blind or have low vision?	yes
115.316 (b)	**Residents with disabilities and residents who are limited English proficient**	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to residents who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.316 (c)	**Residents with disabilities and residents who are limited English proficient**	
	Does the agency always refrain from relying 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 the resident's safety, the performance of first-response duties under §115.364, or the investigation of the resident's allegations?	yes
115.317 (a)	**Hiring and promotion decisions**	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or	yes

	coercion, or if the victim did not consent or was unable to consent or refuse?	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the bullet immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.317 (b)	**Hiring and promotion decisions**	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents?	yes
115.317 (c)	**Hiring and promotion decisions**	
	Before hiring new employees who may have contact with residents, does the agency: Perform a criminal background records check?	yes
	Before hiring new employees who may have contact with residents, does the agency: Consult any child abuse registry maintained by the State or locality in which the employee would work?	yes
	Before hiring new employees who may have contact with residents, does the agency: Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual	yes

	abuse or any resignation during a pending investigation of an allegation of sexual abuse?	
115.317 (d)	**Hiring and promotion decisions**	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?	yes
	Does the agency consult applicable child abuse registries before enlisting the services of any contractor who may have contact with residents?	yes
115.317 (e)	**Hiring and promotion decisions**	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have in place a system for otherwise capturing such information for current employees?	yes
115.317 (f)	**Hiring and promotion decisions**	
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.317 (g)	**Hiring and promotion decisions**	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.317 (h)	**Hiring and promotion decisions**	

	Unless prohibited by law, does the agency 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? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.318 (a)	**Upgrades to facilities and technologies**	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.318 (b)	**Upgrades to facilities and technologies**	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.321 (a)	**Evidence protocol and forensic medical examinations**	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	na
115.321 (b)	**Evidence protocol and forensic medical examinations**	
	Is this protocol developmentally appropriate for youth? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	na
	Is this protocol, as appropriate, adapted from or otherwise based	na

	on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/ Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	
115.321 (c)	**Evidence protocol and forensic medical examinations**	
	Does the agency offer all residents who experience sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.321 (d)	**Evidence protocol and forensic medical examinations**	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.321 (e)	**Evidence protocol and forensic medical examinations**	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory	yes

	interviews?	
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.321 (f)	**Evidence protocol and forensic medical examinations**	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency is responsible for investigating allegations of sexual abuse.)	yes
115.321 (h)	**Evidence protocol and forensic medical examinations**	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (Check N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.321(d) above.)	yes
115.322 (a)	**Policies to ensure referrals of allegations for investigations**	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.322 (b)	**Policies to ensure referrals of allegations for investigations**	
	Does the agency have a policy in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.322	**Policies to ensure referrals of allegations for investigations**	

(c)		
	If a separate entity is responsible for conducting criminal investigations, does such publication describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.321(a))	yes
115.331 (a)	**Employee training**	
	Does the agency train all employees who may have contact with residents on: Its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with residents on: Residents' right to be free from sexual abuse and sexual harassment	yes
	Does the agency train all employees who may have contact with residents on: The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: The dynamics of sexual abuse and sexual harassment in juvenile facilities?	yes
	Does the agency train all employees who may have contact with residents on: The common reactions of juvenile victims of sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: How to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between residents?	yes
	Does the agency train all employees who may have contact with residents on: How to avoid inappropriate relationships with residents?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the agency train all employees who may have contact with residents on: How to comply with relevant laws related to	yes

	mandatory reporting of sexual abuse to outside authorities?	
	Does the agency train all employees who may have contact with residents on: Relevant laws regarding the applicable age of consent?	yes
115.331 (b)	**Employee training**	
	Is such training tailored to the unique needs and attributes of residents of juvenile facilities?	yes
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	yes
115.331 (c)	**Employee training**	
	Have all current employees who may have contact with residents received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.331 (d)	**Employee training**	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.332 (a)	**Volunteer and contractor training**	
	Has the agency ensured that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes

115.332 (b)	**Volunteer and contractor training**	
	Have all volunteers and contractors who have contact with residents been notified of the agency’s zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with residents)?	yes
115.332 (c)	**Volunteer and contractor training**	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.333 (a)	**Resident education**	
	During intake, do residents receive information explaining the agency’s zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
	Is this information presented in an age-appropriate fashion?	yes
115.333 (b)	**Resident education**	
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.333 (c)	**Resident education**	

	Have all residents received such education?	yes
	Do residents receive education upon transfer to a different facility to the extent that the policies and procedures of the resident's new facility differ from those of the previous facility?	yes
115.333 (d)	**Resident education**	
	Does the agency provide resident education in formats accessible to all residents including those who: Are limited English proficient?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are deaf?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are visually impaired?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are otherwise disabled?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Have limited reading skills?	yes
115.333 (e)	**Resident education**	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
115.333 (f)	**Resident education**	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats?	yes
115.334 (a)	**Specialized training: Investigations**	
	In addition to the general training provided to all employees pursuant to §115.331, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	na
115.334	**Specialized training: Investigations**	

(b)		
	Does this specialized training include: Techniques for interviewing juvenile sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	na
	Does this specialized training include: Proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	na
	Does this specialized training include: Sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	na
	Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	na
115.334 (c)	**Specialized training: Investigations**	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	na
115.335 (a)	**Specialized training: Medical and mental health care**	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes

	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.335 (b)	**Specialized training: Medical and mental health care**	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.335 (c)	**Specialized training: Medical and mental health care**	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.335 (d)	**Specialized training: Medical and mental health care**	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.331? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.332? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.341	**Obtaining information from residents**	

(a)		
	Within 72 hours of the resident's arrival at the facility, does the agency obtain and use information about each resident's personal history and behavior to reduce risk of sexual abuse by or upon a resident?	yes
	Does the agency also obtain this information periodically throughout a resident's confinement?	yes
115.341 (b)	**Obtaining information from residents**	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
115.341 (c)	**Obtaining information from residents**	
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Prior sexual victimization or abusiveness?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Current charges and offense history?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Age?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Level of emotional and cognitive development?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Physical size and stature?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Mental illness or mental disabilities?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Intellectual or developmental disabilities?	yes
	During these PREA screening assessments, at a minimum, does	yes

	the agency attempt to ascertain information about: Physical disabilities?	
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: The resident's own perception of vulnerability?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Any other specific information about individual residents that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other residents?	yes
115.341 (d)	**Obtaining information from residents**	
	Is this information ascertained: Through conversations with the resident during the intake process and medical mental health screenings?	yes
	Is this information ascertained: During classification assessments?	yes
	Is this information ascertained: By reviewing court records, case files, facility behavioral records, and other relevant documentation from the resident's files?	yes
115.341 (e)	**Obtaining information from residents**	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents?	yes
115.342 (a)	**Placement of residents**	
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Housing Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Bed assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Work Assignments?	yes

	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Education Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Program Assignments?	yes
115.342 (b)	**Placement of residents**	
	Are residents isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other residents safe, and then only until an alternative means of keeping all residents safe can be arranged?	yes
	During any period of isolation, does the agency always refrain from denying residents daily large-muscle exercise?	yes
	During any period of isolation, does the agency always refrain from denying residents any legally required educational programming or special education services?	yes
	Do residents in isolation receive daily visits from a medical or mental health care clinician?	yes
	Do residents also have access to other programs and work opportunities to the extent possible?	yes
115.342 (c)	**Placement of residents**	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.342 (d)	**Placement of residents**	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.342 (e)	**Placement of residents**	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.342	**Placement of residents**	

(f)		
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.342 (g)	**Placement of residents**	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.342 (h)	**Placement of residents**	
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The basis for the facility's concern for the resident's safety? (N/A for h and i if facility doesn't use isolation?)	na
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged? (N/A for h and i if facility doesn't use isolation?)	na
115.342 (i)	**Placement of residents**	
	In the case of each resident who is isolated as a last resort when less restrictive measures are inadequate to keep them and other residents safe, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.351 (a)	**Resident reporting**	
	Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: 2. Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.351 (b)	**Resident reporting**	

	Does the agency also provide at least one way for residents to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
	Are residents detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security to report sexual abuse or harassment?	yes
115.351 (c)	**Resident reporting**	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.351 (d)	**Resident reporting**	
	Does the facility provide residents with access to tools necessary to make a written report?	yes
115.351 (e)	**Resident reporting**	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes
115.352 (a)	**Exhaustion of administrative remedies**	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no

115.352 (b)	**Exhaustion of administrative remedies**	
	Does the agency permit residents to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.352 (c)	**Exhaustion of administrative remedies**	
	Does the agency ensure that: A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.352 (d)	**Exhaustion of administrative remedies**	
	Does the agency issue a final agency 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 does not include time consumed by residents in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency determines that the 90 day timeframe is insufficient to make an appropriate decision and claims an extension of time (the maximum allowable extension of time to respond is 70 days per 115.352(d)(3)) , does the agency notify the resident in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the resident does not receive a response within the time allotted for reply, including any properly noticed extension, may a resident consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes

115.352 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of residents? (If a third party, other than a parent or legal guardian, files such a request on behalf of a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the resident declines to have the request processed on his or her behalf, does the agency document the resident's decision? (N/A if agency is exempt from this standard.)	yes
	Is a parent or legal guardian of a juvenile allowed to file a grievance regarding allegations of sexual abuse, including appeals, on behalf of such juvenile? (N/A if agency is exempt from this standard.)	yes
	If a parent or legal guardian of a juvenile files a grievance (or an appeal) on behalf of a juvenile regarding allegations of sexual abuse, is it the case that those grievances are not conditioned upon the juvenile agreeing to have the request filed on his or her behalf? (N/A if agency is exempt from this standard.)	yes
115.352 (f)	**Exhaustion of administrative remedies**	
	Has the agency established procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does	yes

	the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the resident is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.352 (g)	**Exhaustion of administrative remedies**	
	If the agency disciplines a resident for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the resident filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.353 (a)	**Resident access to outside confidential support services and legal representation**	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by providing, posting, or otherwise making accessible mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies?	yes
	Does the facility enable reasonable communication between residents and these organizations and agencies, in as confidential a manner as possible?	yes
115.353 (b)	**Resident access to outside confidential support services and legal representation**	

	Does the facility inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.353 (c)	**Resident access to outside confidential support services and legal representation**	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.353 (d)	**Resident access to outside confidential support services and legal representation**	
	Does the facility provide residents with reasonable and confidential access to their attorneys or other legal representation?	yes
	Does the facility provide residents with reasonable access to parents or legal guardians?	yes
115.354 (a)	**Third-party reporting**	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of a resident?	yes
115.361 (a)	**Staff and agency reporting duties**	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment?	yes

	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.361 (b)	**Staff and agency reporting duties**	
	Does the agency require all staff to comply with any applicable mandatory child abuse reporting laws?	yes
115.361 (c)	**Staff and agency reporting duties**	
	Apart from reporting to designated supervisors or officials and designated State or local services agencies, are staff prohibited from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.361 (d)	**Staff and agency reporting duties**	
	Are medical and mental health practitioners required to report sexual abuse to designated supervisors and officials pursuant to paragraph (a) of this section as well as to the designated State or local services agency where required by mandatory reporting laws?	yes
	Are medical and mental health practitioners required to inform residents of their duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.361 (e)	**Staff and agency reporting duties**	
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the appropriate office?	yes
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the alleged victim’s parents or legal guardians unless the facility has official documentation showing the parents or legal guardians should not be notified?	yes
	If the alleged victim is under the guardianship of the child welfare	yes

	system, does the facility head or his or her designee promptly report the allegation to the alleged victim's caseworker instead of the parents or legal guardians? (N/A if the alleged victim is not under the guardianship of the child welfare system.)	
	If a juvenile court retains jurisdiction over the alleged victim, does the facility head or designee also report the allegation to the juvenile's attorney or other legal representative of record within 14 days of receiving the allegation?	yes
115.361 (f)	**Staff and agency reporting duties**	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.362 (a)	**Agency protection duties**	
	When the agency learns that a resident is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the resident?	yes
115.363 (a)	**Reporting to other confinement facilities**	
	Upon receiving an allegation that a resident was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
	Does the head of the facility that received the allegation also notify the appropriate investigative agency?	yes
115.363 (b)	**Reporting to other confinement facilities**	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.363 (c)	**Reporting to other confinement facilities**	
	Does the agency document that it has provided such notification?	yes
115.363 (d)	**Reporting to other confinement facilities**	

	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.364 (a)	**Staff first responder duties**	
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.364 (b)	**Staff first responder duties**	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.365 (a)	**Coordinated response**	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes

115.366 (a)	**Preservation of ability to protect residents from contact with abusers**	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.367 (a)	**Agency protection against retaliation**	
	Has the agency established a policy to 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?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.367 (b)	**Agency protection against retaliation**	
	Does the agency employ multiple protection measures for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services?	yes
115.367 (c)	**Agency protection against retaliation**	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes

	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Any resident disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Resident housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Resident program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.367 (d)	**Agency protection against retaliation**	
	In the case of residents, does such monitoring also include periodic status checks?	yes
115.367 (e)	**Agency protection against retaliation**	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.368 (a)	**Post-allegation protective custody**	
	Is any and all use of segregated housing to protect a resident who	yes

	is alleged to have suffered sexual abuse subject to the requirements of § 115.342?	
115.371 (a)	**Criminal and administrative agency investigations**	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency does not conduct any form of administrative or criminal investigations of sexual abuse or harassment. See 115.321(a).)	na
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency does not conduct any form of administrative or criminal investigations of sexual abuse or harassment. See 115.321(a).)	na
115.371 (b)	**Criminal and administrative agency investigations**	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations involving juvenile victims as required by 115.334?	yes
115.371 (c)	**Criminal and administrative agency investigations**	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.371 (d)	**Criminal and administrative agency investigations**	
	Does the agency always refrain from terminating an investigation solely because the source of the allegation recants the allegation?	yes
115.371 (e)	**Criminal and administrative agency investigations**	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal	yes

	prosecution?	
115.371 (f)	**Criminal and administrative agency investigations**	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual’s status as resident or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.371 (g)	**Criminal and administrative agency investigations**	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.371 (h)	**Criminal and administrative agency investigations**	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.371 (i)	**Criminal and administrative agency investigations**	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.371 (j)	**Criminal and administrative agency investigations**	
	Does the agency retain all written reports referenced in 115.371(g) and (h) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years unless the abuse was committed by a juvenile resident and applicable law requires a shorter period of retention?	yes
115.371 (k)	**Criminal and administrative agency investigations**	

	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation?	yes
115.371 (m)	**Criminal and administrative agency investigations**	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.372 (a)	**Evidentiary standard for administrative investigations**	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.373 (a)	**Reporting to residents**	
	Following an investigation into a resident’s allegation of sexual abuse suffered in the facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.373 (b)	**Reporting to residents**	
	If the agency did not conduct the investigation into a resident’s allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the resident? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
115.373 (c)	**Reporting to residents**	
	Following a resident’s allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the resident’s unit?	yes

	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.373 (d)	**Reporting to residents**	
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
115.373 (e)	**Reporting to residents**	
	Does the agency document all such notifications or attempted notifications?	yes
115.376 (a)	**Disciplinary sanctions for staff**	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual	yes

	harassment policies?	
115.376 (b)	**Disciplinary sanctions for staff**	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.376 (c)	**Disciplinary sanctions for staff**	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) 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?	yes
115.376 (d)	**Disciplinary sanctions for staff**	
	Are 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, reported to: Law enforcement agencies, unless the activity was clearly not criminal?	yes
	Are 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, reported to: Relevant licensing bodies?	yes
115.377 (a)	**Corrective action for contractors and volunteers**	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with residents?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.377 (b)	**Corrective action for contractors and volunteers**	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility	yes

	take appropriate remedial measures, and consider whether to prohibit further contact with residents?	
115.378 (a)	**Interventions and disciplinary sanctions for residents**	
	Following an administrative finding that a resident engaged in resident-on-resident sexual abuse, or following a criminal finding of guilt for resident-on-resident sexual abuse, may residents be subject to disciplinary sanctions only pursuant to a formal disciplinary process?	yes
115.378 (b)	**Interventions and disciplinary sanctions for residents**	
	Are disciplinary sanctions 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?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied daily large-muscle exercise?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied access to any legally required educational programming or special education services?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident receives daily visits from a medical or mental health care clinician?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the resident also have access to other programs and work opportunities to the extent possible?	yes
115.378 (c)	**Interventions and disciplinary sanctions for residents**	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether a resident's mental disabilities or mental illness contributed to his or her behavior?	yes
115.378 (d)	**Interventions and disciplinary sanctions for residents**	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations	yes

	for the abuse, does the facility consider whether to offer the offending resident participation in such interventions?	
	If the agency requires participation in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives, does it always refrain from requiring such participation as a condition to accessing general programming or education?	yes
115.378 (e)	**Interventions and disciplinary sanctions for residents**	
	Does the agency discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.378 (f)	**Interventions and disciplinary sanctions for residents**	
	For the purpose of disciplinary action, does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
115.378 (g)	**Interventions and disciplinary sanctions for residents**	
	Does the agency always refrain from considering non-coercive sexual activity between residents to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between residents.)	yes
115.381 (a)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.341 indicates that a resident has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the resident is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?	yes
115.381 (b)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.341 indicates that a resident has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the resident is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening?	yes

115.381 (c)	**Medical and mental health screenings; history of sexual abuse**	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.381 (d)	**Medical and mental health screenings; history of sexual abuse**	
	Do medical and mental health practitioners obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18?	yes
115.382 (a)	**Access to emergency medical and mental health services**	
	Do resident victims of sexual abuse 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?	yes
115.382 (b)	**Access to emergency medical and mental health services**	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do staff first responders take preliminary steps to protect the victim pursuant to § 115.362?	yes
	Do staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.382 (c)	**Access to emergency medical and mental health services**	
	Are resident victims of sexual abuse 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?	yes
115.382	**Access to emergency medical and mental health services**	

(d)		
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.383 (a)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.383 (b)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.383 (c)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.383 (d)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are resident victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.)	na
115.383 (e)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	If pregnancy results from the conduct described in paragraph § 115.383(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if all-male facility.)	na
115.383 (f)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.383 (g)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	

	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.383 (h)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Does the facility attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners?	yes
115.386 (a)	**Sexual abuse incident reviews**	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.386 (b)	**Sexual abuse incident reviews**	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.386 (c)	**Sexual abuse incident reviews**	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.386 (d)	**Sexual abuse incident reviews**	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes

	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.386(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.386 (e)	**Sexual abuse incident reviews**	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.387 (a)	**Data collection**	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.387 (b)	**Data collection**	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.387 (c)	**Data collection**	
	Does the incident-based data 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?	yes
115.387 (d)	**Data collection**	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.387 (e)	**Data collection**	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for	na

	the confinement of its residents.)	
115.387 (f)	**Data collection**	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.388 (a)	**Data review for corrective action**	
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.388 (b)	**Data review for corrective action**	
	Does the agency’s annual report include a comparison of the current year’s data and corrective actions with those from prior years and provide an assessment of the agency’s progress in addressing sexual abuse?	yes
115.388 (c)	**Data review for corrective action**	
	Is the agency’s annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.388 (d)	**Data review for corrective action**	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when	yes

	publication would present a clear and specific threat to the safety and security of a facility?	
115.389 (a)	**Data storage, publication, and destruction**	
	Does the agency ensure that data collected pursuant to § 115.387 are securely retained?	yes
115.389 (b)	**Data storage, publication, and destruction**	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.389 (c)	**Data storage, publication, and destruction**	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.389 (d)	**Data storage, publication, and destruction**	
	Does the agency maintain sexual abuse data collected pursuant to § 115.387 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	**Frequency and scope of audits**	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	**Frequency and scope of audits**	
	Is this the first year of the current audit cycle? (Note: a “no” response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na

	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
115.401 (h)	**Frequency and scope of audits**	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	**Frequency and scope of audits**	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	**Frequency and scope of audits**	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	**Frequency and scope of audits**	
	Were inmates, residents, and detainees permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403 (f)	**Audit contents and findings**	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes