

**COMPLIANCE WITH THE PRISON
RAPE ELIMINATION ACT (PREA)
RESPONSIVE PLANNING**

PURPOSE

Connections Community Support Programs, Inc. is committed to complying fully with the Prison Rape Elimination Act of 2003, 28 CFR Part 115 and ensuring the safest and highest-quality services for consumers under our care.

Policies to ensure referrals of allegations for investigations

- a. Connections Community Support Programs, Inc. will make sure that an administrative investigation or criminal investigation is completed for all allegations of sexual abuse or sexual harassment at New Expectations.
- b. It is the policy of New Expectations that all allegations of sexual abuse or sexual harassment at New Expectations will be referred for investigation by the City of Newark Police Department, which is the law enforcement agency with legal authority to handle criminal matters occurring at that site. All accusations of criminal behavior will be referred.
- c. All referrals for criminal investigation will be thoroughly documented and this policy will be posted on the Connections website under the New Expectations tab.
- d. The City of Newark Police Department will have plenary authority in criminal investigations and New Expectations will defer to their jurisdiction. In some cases, a Connections agency-assigned investigator will conduct a parallel inquiry, but will never interfere with or impede the Newark Police Department's criminal case.
- e. Connections is not aware of any State entities or Department of Justice components responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in community confinement facilities.

Evidence protocol and forensic examinations

- a. To the extent the agency is responsible for investigating allegations of sexual abuse, Connections Community Support Programs, Inc. will follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence in criminal prosecutions and administrative proceedings.
- b. This protocol 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.
- c. Connections Community Support Programs, Inc. will offer all residents at the New Expectations Program access to forensic medical examinations whether on-site or at an

PREA Standard §115.222 – Policies to Ensure Investigative Referrals

PREA Standard §115.221 – Evidence Protocol and Forensic Exams

outside facility, without financial cost, whenever appropriate for evidentiary or medical purposes. 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.

It is known that forensic evidence may be retrievable for up to five days after a sexual assault, and SANE exams will be offered whenever it is believed DNA, fibers, bruising, tearing, or other forensic evidence may be retrieved from a victim. The established protocol upon the report of an allegation of sexual assault by a resident of New Expectations is to transport the victim to a Christiana Care Health Services (CCHS Christiana Hospital or CCHS Wilmington Hospital) Emergency Room. CCHS has forensic nurse examiners on duty in the Emergency Room at all times.

Christiana Care forensic nurse examiners treat more than 200 victims of sexual assault every year. Nurse examiners at Christiana Care's emergency departments are part of the state of Delaware's multidisciplinary Sexual Assault Response Team, created to ensure that survivors of sexual assault do not become victims of a fragmented medical-legal system. They offer confidential services, evaluate each victim's pregnancy risk and help prevent sexually transmitted diseases and infections. These services are provided at no cost to the victim. Confidential services are provided whether or not the victim chooses to have police involvement.

- d. Connections Community Support Programs, Inc. will use every effort to make a victim advocate from a rape crisis center available to any victim. Connections has an MOU in place with the YWCA Sexual Response Center (SARC), and that service is assessable to the public as well. If for some unforeseen reason a rape crisis center is not available to provide victim advocate services, Connections will locate a qualified staff member from a community-based organization. Connections will document efforts to secure services from rape crisis centers. For the purpose of this policy, a rape crisis center refers to an entity that provides intervention and related assistance, such as the services specified in 42 U.S.C. 14043, to victims of sexual assault of all ages. It is not the practice of Connections to utilize rape crisis centers that are part of a governmental unit or are part of the criminal justice system.

Connections Community Support Programs, Inc. will strive to maintain a working relationship, with an outside rape crisis, or rape advocacy agency to provide rape crisis services. When requested, and where applicable, Connections will help coordinate contact with an advocate at the hospital, or upon return to the facility.

- e. Upon the victim's request, the victim advocate, or 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.
- f. Although Connections itself is not responsible for investigating criminal allegations of sexual abuse, Connections will request that the investigating agency follow the requirements of paragraphs (a) through (e) of this section.