



**OFFICE OF REFUGEE RESETTLEMENT  
PREVENTION OF SEXUAL ABUSE  
COMPLIANCE AUDIT TOOL**

**ICF INSTRUCTIONS  
FOR SITE VISIT  
AND FACILITY TOUR**

THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13) STATEMENT OF PUBLIC BURDEN: The purpose of this information collection is to allow ORR contractor auditors to collect information and ask questions during the site visit and facility tour. PSA audits are required in the Interim Final Rule on Standards to Prevent, Detect, and Respond to Sexual Abuse and Sexual Harassment Involving Unaccompanied Children (45 CFR Part L). Public reporting burden for this collection of information is estimated to average 2 hours per response for the care provider and 1 hour per response for the contractor performing the audit, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. This is a mandatory collection of information (Homeland Security Act, 6 U.S.C. 279). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information subject to the requirements of the Paperwork Reduction Act of 1995, unless it displays a currently valid OMB control number. If you have any comments on this collection of information please contact [UCPolicy@acf.hhs.gov](mailto:UCPolicy@acf.hhs.gov).

## INTRODUCTION AND MEETING WITH FACILITY

An agenda will have been sent prior to your arrival on site but you will want to make sure you have copies of the agenda available at the meeting. It is always best to have a hard copy of the agenda as there may be individuals who did not read it, don't have access to their computer in the meeting, or were not on the initial email with the agenda attached.

You will need a sign-in sheet so we can record who was in the meeting. A sample can be found in the Audit Instruments folder.

Start by walking through the agenda.

Ask if there are any questions with the agenda, if anything needs to be added, etc.

Once questions are addressed, proceed with the agenda.

### Some things you will want to ask for:

- The materials listed in the Preaudit Questionnaire and Audit Documentation Requested Checklist.
- A list of unaccompanied children represented by attorneys (i.e., have a G-28 on file), if applicable.
- The contact information of the facility's state licensing representative. (Provide a link to the facility's state licensing requirements.)
- The contact information for the facility's state Child Protective Services (CPS) representative.
- The contact information for the facility's Human Resource (HR) and training departments.
- The name of the person responsible for mental health services at the facility.
- The name and location of your mental health provider, if applicable.
- A schedule outlining when and how often legal service providers are on site. Will they be on site during the monitoring visit?
- For current and former employees, staff, and contractors, the facility will need to provide:
  - A document of **all** current staff that includes the following information about each:
    - Staff member's name
    - Position
    - Start date
    - Date passed/cleared FBI fingerprint check
    - Date passed/cleared child abuse/neglect check (CA/N)
      - Resident of this state for last five years (yes, or no?)
      - If resided in other state(s) over the past five years: Date passed/cleared CA/N for that/those states

- All background investigation updates, if applicable
  - Provide an explanation if there are any issues with any checks (e.g., “Not pass” prior to hire/start date)
- Provide a document of **all** current volunteers/contractors with direct access to unaccompanied children (UC) that includes the following information about each:
  - Volunteer/Contractor’s name
  - Role
  - Start date (direct access to UC)
  - Date passed/cleared FBI fingerprint check,
  - Date passed/cleared CA/N check
    - Resident of state for last five years (yes, or no?)
    - If resided in other state(s) over the past five years: Date passed/cleared CA/N for that/those states
  - All background investigation updates, if applicable
  - An explanation if there are any issues with any checks, (e.g., “not pass” prior to hire/start date)
- Any policy, procedures, pamphlets, or documents not received during the preaudit phase
- Where the audit team will be working from in the facility
- What hours we can be in the facility (some are union and will have tighter timeframes for hours we can be on site)
- Where the interviews with staff and UCs will be held (ensure these are private areas)
- Where we would find the PSA Compliance Manager, should we need to

## QUESTIONS TO COVER DURING OVERALL VISIT

These are some questions you will want to make sure are covered in your conversations or your interviews. Most should be covered in the interview guides, but use this list to double-check.

### PROGRAM MANAGEMENT

1. Describe the community partnerships established by your program and any formal agreements or memorandums of understandings with local service providers.
  2. Describe any barriers you have encountered in your efforts to enter partnerships.
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### QUALITY ASSURANCE/ INTERNAL MONITORING

1. Describe how your agency monitors the sexual abuse prevention program and include how often the program area is monitored and the actions taken when noncompliance is detected.
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### CHILD PROTECTION

1. How does the facility respond when a child or staff member reports sexual abuse, sexual harassment, or other inappropriate sexual behaviors?
  2. Describe your facility's staffing plan to address the UC-to-staff ratio requirements?
  3. Describe your facility's policies and procedures to ensure the accurate and timely submission of Significant Incident Reports (SIRs) and Sexual Abuse Significant Incident Reports (SA/SIRs)?
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### GENERAL SAFETY AND SECURITY

1. Describe the facility's video monitoring/alarm system policies and procedures, if applicable.
  2. Describe the facility's ability to download video footage permanently, if applicable.
  3. If none of the above is applicable, please provide the state/local link to licensing requirements prohibiting and/or limiting the use of video/alarm system monitoring.
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### INTAKE AND ORIENTATION SERVICES

1. Provide an English version of all care provider zero-tolerance sexual abuse and sexual harassment documents in the UC orientation packet (include any documents that are provided to the UC for signature).
  2. If the documents are available in other languages, request copies of those.
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### CASE MANAGEMENT/RELEASE AND REUNIFICATION

1. Specify the current case manager-to-UC ratio, as well as the number of hired case managers and the number of vacancies in the department.
2. Where are the open and closed files kept? Who has access to them?

3. Who is responsible for maintaining case files?
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### **BACKGROUND CHECKS: STAFF, VOLUNTEERS, AND CONTRACTORS**

1. Provide a detailed summary explaining the background checks that are completed on staff prior to hire and on volunteers/contractors prior to direct access to UC.
  2. Provide a detailed summary explaining background re-investigation checks that are completed after initial background check clearance for staff, volunteers, and contractors. How often does this occur?
  3. Provide a detailed explanation of the documentation in the HR file confirming that the FBI fingerprint check/results and the CA/N check have been completed for all staff and required volunteers and contractors.
  4. Explain how the care provider determines if a subject has resided in another state during a five-year period prior to hire or start date.
  5. Provide a detailed summary explaining your state licensing requirements for FBI fingerprint checks and CA/N Checks.
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### **HEALTH SERVICES**

1. Who is responsible for entering timely and accurate medical data into the UC Portal Health tab?
  2. Who is responsible for preparing and tracking Treatment Authorization Requests (TARs)?
  3. Describe your procedures when a UC has an emergency medical need?
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### **MENTAL HEALTH SERVICES**

1. Describe your facility's process (including timeframes) for referring children to an outside provider when an acute mental health problem/emergency has been identified.
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### **EDUCATIONAL SERVICES**

1. Describe how you ensure UCs are educated on the facility's zero tolerance policies?
  2. Describe how UCs receive refresher training?
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## FACILITY TOUR

The auditor must observe all areas of the audited care provider facility. The instructions that follow are designed to highlight those areas that must be observed carefully to verify compliance with the Interim Final Rule (IFR), and the Office of Refugee Resettlement (ORR) policy as listed in Section 4 of Children Entering the United States Unaccompanied. **However, every area of the facility should be observed as the IFR requires.** In every instance, the auditor should pay attention to the quality of supervision given to children and youth. Notice blind spots and any other indicators that a facility area is not monitored in a way that keeps children safe from sexual abuse and sexual harassment. It may be necessary to go back and look at areas of the facility after the tour if the review of case files, other documentation, or interviews lead the auditor to have questions about the safety and supervision provided in each area of the facility.

### AREAS TO BE TOURED:

1. All housing units, including bedrooms (or anywhere children sleep)
2. Administrative offices (e.g., intake, reception, screening, etc.)
3. Health care area (e.g., medical and mental health clinics, infirmaries, etc.)
4. Recreation, cafeteria, and other programming areas (e.g., education or special education areas)
5. Areas that were renovated, modified, or expanded
6. Any areas to which the UCs have access

### 1. Things to look for and questions to ask in the housing units:

#### LOOK

- ▶ Are staff in ratio?
- ▶ Are the ORR sexual abuse posters posted?
- ▶ Are the ORR and care provider's sexual abuse pamphlets available?
- ▶ Are the posters and pamphlets available in languages other than English?
- ▶ Where are the pre-programmed phones located? Do they provide privacy while allowing for supervision?
- ▶ Where are cameras placed? Do they have a line of sight into rooms and/or toilet and shower areas?

#### ASK

##### Staff on Duty:

- ▶ Do staff perform unannounced rounds?
- ▶ What is the staffing ratio during waking hours and during the night?

## UC:

- ▶ Do you know how to report an incident of sexual abuse or sexual harassment?
- ▶ Do staff walk through your dorm/housing unit? How often?
- ▶ Can you change your clothes, use the toilet, and shower without staff watching you?

## 2. Things to look for and questions to ask in administrative offices:

### LOOK

- ▶ Where are UC files kept and who has access?
- ▶ Review files and look for Assessment for Risk, related information, and any indication of decision-making based on that screening.
- ▶ Where are the personnel files kept and who has access?

### ASK

- ▶ What do you do with information you receive during the Assessment for Risk that suggests a UC might be at risk for sexual abuse or for abusing other minors?
- ▶ How much notice is needed if UC monitors would like to review personnel files while on site?

## 3. Things to look for and questions to ask in the health care areas:

### LOOK

- ▶ Are there private rooms where youth can be seen by medical and mental health care staff?
- ▶ Where are medical and mental health records kept?

### ASK

#### **Medical AND mental health care staff:**

- ▶ Can you see children and youth privately?
- ▶ Who has access to UC medical and mental health care files?
- ▶ What is the protocol if someone reports an incident of sexual abuse or sexual harassment to you (whether it took place at this facility, recently or in the past, or elsewhere in the past)?
- ▶ What is the protocol for conducting a sexual abuse forensic medical examination?
- ▶ Have you received special training in dealing with victims of sexual abuse? If so, what was included in that training?
- ▶ What questions do you ask UC to determine whether they are at risk for sexual abuse or predatory behavior?
- ▶ Where are the Assessments for Risk kept and who has access to them? When does the initial screening take place?

#### 4. Things to look for and questions to ask in the recreation, cafeteria, and other programming areas:

##### LOOK

- ▶ Are staff in ratio?
- ▶ How well-supervised are these areas?
- ▶ Where are cameras placed?
- ▶ Are there blind spots?

##### ASK

##### **UCs:**

- ▶ Is the level of supervision present today typical? Are there times when this area is less supervised?
- ▶ Do you feel safe in this area?

#### 5. Things to look for and questions to ask in renovated, modified, or expanded areas:

##### LOOK

- ▶ Have new or renovated areas been designed to ensure adequate supervision/monitoring of UC?
- ▶ Are there new video monitoring systems, electronic surveillance systems, or other monitoring technologies that have been installed since the last audit, and, if so, are they used in a manner that maximizes the safety of children from sexual abuse and sexual harassment?

##### ASK

##### **Facility staff**

- ▶ What kind of analysis was done to inform decisions about design of new or renovated areas of the facility?
- ▶ What kind of analysis was done to inform placement/deployment of video monitoring systems, electronic surveillance systems, or other monitoring technologies?