

# PRISON RAPE ELIMINATION ACT (PREA)



## COST IMPACT ANALYSIS

PREPARED FOR THE  
DEPARTMENT OF JUSTICE  
OFFICE OF JUSTICE PROGRAMS

## FINAL REPORT June 18, 2010

Cost impact analysis of the NPREC  
standards specific to 49 sites.

Booz | Allen | Hamilton

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## Executive Summary

This document is the final report of the Prison Rape Elimination Act (PREA) Cost Impact Analysis, an effort to assist the Bureau of Justice Assistance (BJA) in the review of the standards published by the National Prison Rape Elimination Commission (NPREC) on June 23, 2009. This document assesses the costs specific to each standard, assesses variations within the cost estimates, and addresses a comprehensive view of implementation and compliance on a national level. It covers five sectors of correctional operations: state prison systems, state and local juvenile facilities, community corrections, and local/county jails, police lockups.

Table E-1: Standards with Negligible or Non-Existent Costs

Standards with a negligible or non-existent cost impact		Compliance
RE1	Inmate reporting	96%
DC4	Data storage, publication, and destruction	94%
MM2	Access to emergency medical and mental health services	90%
DI1	Disciplinary sanctions for staff	88%
OR4	Coordinated response	86%
IN2	Criminal and administrative agency investigations	86%
RE4	Third-party reporting	71%
OR2	Reporting to other confinement facilities	69%
OR3	Staff first responder duties	69%
OR1	Staff and facility head reporting duties	67%
DI2	Disciplinary sanctions for inmates	65%
MM1	Medical and Mental Health Screenings - history of sexual abuse	55%

### Overall Cost Impacts

Among the 41 PREA standards, 12 have negligible or non-existent cost impacts as shown in Table E-1. The majority of the sites visited during this project, approximately 8 out of 10, demonstrated compliance with these standards. For the sites not in compliance with these standards, there was no indication that meeting the PREA standards would result in any measurable cost. Twenty-six standards have anywhere from a very minimal to modestly sizable cost impact most often affecting numerous sites and sectors but with some variability. Table E-2 lists these standards organized, from highest-to-lowest according to ongoing costs. These 26 standards have varying degrees of compliance. Some are compliant with relatively more standards than others. To illustrate this, Table E-3 shows that seven out of the 26 standards have a compliance rate of 70% or higher. This means that for each standard in that list, at least 70% of the sites in this study demonstrated compliance. For example, Evidence Standard for Administrative Investigations (IN6) shows a 96% compliance rate. In other words, 96% or 47 sites out of 49, in this study exhibited compliance with this standard. This standard, therefore, has a relatively low cost and a high compliance.

Table E-2: Standards with a Minimal or Modest Cost

Standard	Description	Total Costs (\$K)	
		Upfront	On-Going
MM3	Ongoing medical and mental health care for sexual abuse victims and abusers	\$12	\$5,773
PP2	Contracting with other entities for the confinement of inmates	\$0	\$5,695
AU1	Audits of standards	\$0	\$5,167
TR1	Employee training	\$4,484	\$4,375
PP1	Zero tolerance of sexual abuse	\$48	\$3,768
RP2	Agreements with outside public entities and community service providers	\$33	\$1,611
SC2	Use of screening information	\$170	\$1,605
RP1	Evidence protocol and forensic medical exams	\$25	\$1,396
IN1	Duty to investigate	\$18	\$1,264
ID6	Supplement to SC-2	\$9	\$746
SC1	Screening for risk of victimization and abusiveness	\$530	\$677
PP6	Hiring and promotion decisions	\$4	\$284
RP3	Agreements with outside law enforcement agencies	\$21	\$258
RP4	Agreements with the prosecuting authority	\$21	\$250
DC3	Data review for corrective action	\$352	\$176
TR3	Inmate education	\$458	\$161
TR5	Specialized training: Medical and mental health care	\$1,462	\$153
TR2	Volunteer and contractor training	\$572	\$142
DC1	Sexual abuse incident reviews	\$2	\$126
RE2	Exhaustion of administrative remedies	\$6	\$105
IN3	Evidence standard for administrative investigations	\$1	\$79
DC2	Data Collection	\$17	\$72
PP5	Accommodating inmate with special needs	\$2	\$47
TR4	Specialized training: Investigations	\$316	\$15
OR5	Agency protection against retaliation	\$500	\$0
RE3	Inmate access to outside confidential support services	\$98	\$0

This contrasts with the remaining 19 standards, Table E-4, that show relatively low compliance rates. In this case, Audits of Standards (AU1) can be seen to have a 0% compliance rate whereby no sites demonstrated compliance. This should come to no surprise since there are no audits currently available. A similar conclusion can be made for Zero Tolerance of Sexual Abuse where only four sites (or 8% of the 49 total sites) have a PREA Coordinator on staff.

Table E-3: Standards with Compliance Less than 70%

Standard		Total Costs (\$K)		Overall Compliance
		Upfront	On-Going	
IN3	Evidence standard for administrative investigations	\$1	\$79	96%
RP3	Agreements with outside law enforcement agencies	\$21	\$258	88%
PP5	Accommodating inmate with special needs	\$2	\$47	88%
RP4	Agreements with the prosecuting authority	\$21	\$250	88%
DC2	Data Collection	\$17	\$72	80%
PP2	Contracting with other entities for the confinement of inmates	\$0	\$5,695	73%
DC3	Data review for corrective action	\$352	\$176	73%

Table E-4: Standards with Compliance Less than 70%

Standard		Total Costs (\$K)		Overall Compliance
		Upfront	On-Going	
RP1	Evidence protocol and forensic medical exams	\$25	\$1,396	69%
SC2	Use of screening information	\$170	\$1,605	69%
DC1	Sexual abuse incident reviews	\$2	\$126	59%
RE3	Inmate access to outside confidential support services	\$98	\$0	59%
OR5	Agency protection against retaliation	\$500	\$0	59%
MM3	Ongoing medical and mental health care for sexual abuse victims and abusers	\$12	\$5,773	57%
ID6	Supplement to SC-2	\$9	\$746	51%
TR2	Volunteer and contractor training	\$572	\$142	43%
TR5	Specialized training: Medical and mental health care	\$1,462	\$153	43%
TR4	Specialized training: Investigations	\$316	\$15	41%
IN1	Duty to investigate	\$18	\$1,264	41%
SC1	Screening for risk of victimization and abusiveness	\$530	\$677	45%
TR1	Employee training	\$4,484	\$4,375	37%
RE2	Exhaustion of administrative remedies	\$6	\$105	33%
TR3	Inmate education	\$458	\$161	31%
RP2	Agreements with outside public entities and community service providers	\$33	\$1,611	24%
PP6	Hiring and promotion decisions	\$4	\$284	22%
PP1	Zero tolerance of sexual abuse	\$48	\$3,768	8%
AU1	Audits of standards	\$0	\$5,167	0%

Three standards (PP3, PP4, and PP7) account for 99% of all upfront costs, and one, PP7, accounts for 96% of all upfront costs, seen in Table E-5. This finding is attributed primarily to undefined and misinterpreted requirements based on the current language of the standard. Two standards (PP3 and PP4) account for 76% of all ongoing costs, solely driven by increased staffing required to meet the intent of the standards as they are written. This table also shows that two of the three (PP4 and PP7) have relatively low compliance rates meaning that few sites exhibit compliance. Inmate Supervision (PP3) on the other hand, shows a combination of a high cost and high compliance rate, indicating that of the few sites noncompliant with the standard, the cost impacts are very high.

Table E-5: Standards with the Highest Costs

Standard		Total Costs (\$K)		% of Total Costs		Overall Compliance
		Upfront	On-Going	Upfront	On-Going	
PP3	Inmate supervision	\$1,665	\$88,848	0%	38%	73%
PP4	Limits to cross-gender viewing and searches	\$21,293	\$89,974	3%	39%	39%
PP7	Assessment and use of monitoring technology	\$770,634	\$20,354	96%	9%	31%

Another means to determine the relative cost impact and its magnitude is to compare a site's overall cost impact to its annual operating budget. This can provide a measure of the relative impact on a site's daily operations and whether they can or cannot absorb the additional costs as a result of PREA. Tables E-6 and E-7 (one for annual, ongoing costs and another for one-time, upfront costs) depict the cost impacts by standard across each of the five sectors. The Harvey Balls™ represent an order of magnitude distinguishing between relatively low and high costs. They are based on a percentage of the annual

aggregate operating budget for each sector. Standards that do not result in any cost impact for any sector are not depicted in the tables. The degree to which each Harvey Ball is shaded indicates the magnitude of the cost impact, or percentage of the overall operating budget. An empty ball ○ represents

standards that do not result in any cost impact. A quarter-shaded ball ◐ represents an overall impact on annual operating budget between 0% and 0.25%, and a half-shaded ball ◑ represents an impact

between 0.25% and 0.50%. A fully-shaded ball ● represents any percent impact on annual operating budget that is greater than 0.50%.

For example, Inmate Supervision for prisons is represented by a fully-shaded Harvey Ball. The aggregate costs of all the prison systems in this study is 0.51% of their aggregate operating budget. Meanwhile, the upfront costs in Table E-7 on the next page shows a full Harvey Ball for Assessment and Use of

Table E-6: Yearly Cost Impacts as % of Annual Operating Budget

Priority	Standard	Prisons	Jails	Juvenile	Comm. Corr.	Lockups
1	PP4 Limits to cross-gender viewing and searches	●	◐	◐	●	◐
2	PP3 Inmate Supervision	●	●	◐	◐	○
3	PP7 Assessment and use of monitoring technology	◐	◐	◐	n/a	○
4	MM3 Ongoing medical and mental health care	◐	◐	◐	○	n/a
5	AU1 Audits of standards	◐	◐	◐	◐	◐
6	TR1 - TR5 Training and education	◐	◐	◐	◐	◐
7	PP2 Contracting with other entities for the confinement of inmates	◐	◐	◐	◐	○
8	PP5 Accommodating inmates with special needs	◐	◐	○	◐	◐
9	PP1 Zero tolerance of sexual abuse	◐	◐	◐	◐	◐
10	SC1/SC2 Screening for risk of sexual abuse	◐	◐	◐	○	◐
11	RP2-RP4, RE3 Contract modifications for outside services	◐	○	◐	◐	○
12	RP1 Evidence protocol and forensic medical exams	◐	◐	◐	◐	○
13	IN1/IN3 Investigations	◐	◐	◐	○	○
14	DC6 Supplement to SC-2: Use of screening information	○	◐	n/a	n/a	n/a
15	PP6 Hiring and promotion decisions	◐	◐	◐	◐	◐
16	DC1-DC3 Gathering, reviewing, and reporting data	◐	◐	◐	◐	○
17	RE2 Exhaustion of administrative remedies	◐	◐	○	○	○
18	OR5 Agency protection against retaliation	○	○	○	○	○

Monitoring Technology (PP7), representing an upfront percent impact of 4.83% for prisons. The primary reason for the significantly higher percentage is attributed to the investment required for technical modernization and retrofits. Thus a site could theoretically be compliant with 99% of the standards with the exception of PP7 and still exhibit a large cost impact.

Appendix A includes similar tables with additional detail for each site categorized by sector.

Table E-7: Ongoing Cost Impacts as % of Annual Operating Budget

Priority	Standard	Prisons	Jails	Juvenile	Comm. Corr.	Lockups
1	PP4 Limits to cross-gender viewing and searches					
2	PP3 Inmate Supervision					
3	PP7 Assessment and use of monitoring technology				n/a	
4	MM3 Ongoing medical and mental health care					n/a
5	AU1 Audits of standards					
6	TR1 - TR5 Training and education					
7	PP2 Contracting with other entities for the confinement of inmates					
8	PP5 Accommodating inmates with special needs					
9	PP1 Zero tolerance of sexual abuse					
10	SC1/SC2 Screening for risk of sexual abuse					
11	RP2-RP4, RE3 Contract modifications for outside services					
12	RP1 Evidence protocol and forensic medical exams					
13	IN1/IN3 Investigations					
14	DC6 Supplement to SC-2: Use of screening information			n/a	n/a	n/a
15	PP6 Hiring and promotion decisions					
16	DC1-DC3 Gathering, reviewing, and reporting data					
17	RE2 Exhaustion of administrative remedies					
18	OR5 Agency protection against retaliation					

**Overall Compliance**

Sites have varying degrees of compliance with the standards ranging from a high of 88% to a low of 38%. The site with the highest ranking (MA Department of Youth Services) is compliant with 88% of the standards. The average compliance is 63%. Table E-8 on the next page shows the compliance rates for each site in the study.

On average and collectively, lockups have the highest compliance rate at 74%, while jails have the lowest rate at 61%. The higher compliance rates among lockups may be a reflection of the fewer number of standards, their relative small size, and the low number of samples in this study (four). The other four sectors in this study all have relatively close compliance rates; between 67% and 61%.

A general correlation exists between lower compliance rates and higher costs, however this is just a general pattern and there are several exceptions. Nine of the 41 standards have compliance rates under 40%. Two of these standards, the PREA Audit (AU1) and the PREA Coordinator (PP1), would not be expected to have any compliance because the NPREC standards have not been officially promulgated although four sites already have staff assigned as PREA Coordinator.

Table E-9 at the bottom of the page shows each of the 29 standards with a notable cost impact and their underlying causes for the cost impact. The standards are organized according to magnitude of the

Table E-8: Compliance Rates by Site

Site	Sector	Percent Compliance	Site	Sector	Compliance % of Standards
MA DYS	Juvenile	88%	IN DYS	Juvenile	63%
MA DOC	Prison	85%	OYA	Juvenile	63%
AR JA	Juvenile	85%	Middleton PD	Lockups	63%
Denver County	Jail	84%	Albany County	Jail	61%
Seattle PD	Lockups	82%	Norfolk City	Jail	61%
OR DOC	Prison	80%	MO PP	Community Corrections	61%
MO DYS	Juvenile	78%	Aiken County	Jail	59%
CA DOC	Prison	76%	Marion County	Jail	59%
MA OCC	Community Corrections	74%	Sacramento County	Jail	56%
Peumansend Creek	Jail	73%	Hennepin County	Jail	56%
DCPA	Lockups	73%	WA Pierce County	Jail	56%
Rocklin PD	Lockups	73%	NY DOC	Prison	54%
MN DOC	Prison	71%	VA DOC	Prison	54%
Essex County	Jail	70%	Pulaski County	Jail	54%
AR DOC	Prison	68%	Jefferson County	Jail	53%
RI DOC	Prison	68%	WA DOC	Prison	51%
Ada Juv	Juvenile	68%	MO DOC	Prison	49%
CA DJJ	Juvenile	68%	SC DOC	Prison	49%
IN DOC	Prison	66%	Alachua County	Jail	49%
WI Pierce County	Jail	66%	Anoka County	Jail	49%
AR DCC	Community Corrections	66%	IN DOR	Community Corrections	48%
Miami-Dade	Jail	63%	WA CC	Community Corrections	47%
SC PPP	Community Corrections	63%	CO DOC	Prison	41%
CO DYC	Juvenile	63%	FL DJJ	Juvenile	40%
			IDJC	Juvenile	38%

ongoing cost impact from highest to lowest. Although there are clearly some relatively significant upfront costs that overshadow the ongoing costs (e.g., PP7), prioritizing the standards by ongoing costs emphasizes the long-term cost impact as a result of the NPREC Standards. Some standards are bundled together: the training standards (TR1 through TR5); the Screening Standards (SC1 and SC2); Gathering, Reviewing and Reporting Data Standards (DC1 through DC3);

Contract Modifications for Outside Services (RP2 though RP3 and RE3); and Investigations (IN1 and IN3). Booz Allen believes that they are either dependent upon each other (such as data reviewing, or screening standards) or are logically tied to each other because of their similarities in breadth and scope (such as the training, investigations, and contract modification standards) and any attempt to decouple one will either diminish the value of the others or jeopardize the collective objective of the set.

Table E-9: Major Cost Drivers and Underlying Causes

Cost Impact Rank	Standard	Underlying Cost Driver
1	PP4 Limits to cross-gender viewing and searches	The prohibition of cross-gender pat down searches results in major workforce realignments given the current male/female staffing ratios relative to inmate male/female ratios.
2	PP3 Inmate Supervision	With a level of subjectivity based upon one's definition of what is considered adequate, many sites perceive a need to hire more staff as a means of preventing sexual abuse.
3	PP7 Assessment and use of monitoring technology	Agencies are required to utilize video monitoring systems to eliminate sexual abuse with little to no guidance on the extent, quality, and specifications of this technology as it relates to their site's characteristics and operations.
4	MM3 Ongoing Medical and Mental Health Care	Agencies must provide medical and/or mental health treatment to all known <i>abusers</i> of sexual violence, greatly expanding the number of offenders served.
5	AU1 Audits of standards	Agencies must conduct a triennial audit of all facilities.
6	TR1 - TR5 Training and Education	Agencies are required to expand or modify current training programs to cover all employees (including non-sworn officers and administrative assistants), contractors and volunteers, offenders, and ensure specialized training is provided to investigators and the medical and mental health care staff.
7	PP2 Contracting with other entities for the confinement of inmates	Contracted facilities must comply with all NPREC standards, passing any increased costs over to agencies in the form of increased fees.
8	PP5 Accommodating inmates with	Agencies must implement new policies and procedures to provide interpretive services.
9	PP1 Zero tolerance of sexual abuse	Every site requires a PREA Coordinator requiring hiring additional staff.
10	SC1 and SC2 Screening for Risk of Sexual Abuse	Agencies are required to modify existing tools or implement procedures where one does not exist.
11	RP2 - RP4 and RE3 Contract modifications for outside services	Agencies must enter or attempt to enter into contractual agreements with outside entities to provide confidential emotional support, transition services, and at times, investigative and law enforcement services
12	RP1 Evidence protocol and forensic	Agencies must provide a victim advocate during the medical exam process.
13	IN1 and IN3 Investigations	Agencies will see and increased volume of investigations as a result of more reports of sexual abuse
14	ID6 Supplement to SC-2: Use of Screening Information	Agencies are required to house immigrant detainees separate from the general inmate population, resulting in physical plant investments or increase personnel.
15	PP6 Hiring and promotion decisions	Agencies are required to conduct criminal background checks on employees considered for promotion.
16	DC1 - DC3 Gathering, Reviewing and Reporting Data	Agencies are required to enhance existing processes for gathering, reviewing and reporting of sexual abuse data, resulting in addition personnel costs as a level of effort.
17	RE2 Exhaustion of Administrative Remedies	Agencies are required to modify existing policies or accompanying a victim to federal court. In addition, this contradicts with PLRA.
18	OR5 Agency protection against retaliation	Agencies are required modify existing inmate tracking systems to accommodate additional data characteristics.



Table 1: Site Legend

## Introduction

The Prison Rape Elimination Act (PREA) of 2003 (P.L. 108-79) established the National Prison Rape Elimination Commission (NPREC) to develop and implement national standards for the detection, prevention, reduction and punishment of prison rape<sup>1</sup>. The Bureau of Justice Assistance (BJA) tasked Booz Allen to assist in the review process of the standards published by NPREC on June 23, 2009 to assess their cost impact at correctional institutions across the country. This report provides an analysis of the cost impact based on data from 49 sites<sup>2</sup> representing 13 prisons, 16 jails, 10 juvenile facilities, 6 community corrections, and 4 lockups. Geographically, 12 sites are in the Midwest, 8 are in the Northeast, 13 are in the South, and 16 are in the West. Table 1 lists the sites included in this study along with the acronyms used throughout the report.

## Methodology

The Booz Allen team, consisting of criminal/juvenile justice subject matter experts (SME) and cost estimating specialists, conducted on-site face-to-face meetings with representatives from each of the 49 sites. The objective of these meetings was to obtain a cost impact of implementing new policies and procedures as a result of the NPREC standards. To provide guidance for the discussions and data gathering, the Booz Allen team developed and used a questionnaire based on the *Standards for the*

Prisons	State	Acronym
<b>Midwest</b>		
Minnesota Department of Corrections	MN	MN DOC
Indiana Department of Corrections	IN	IN DOC
Missouri Department of Corrections	MO	MO DOC
<b>Northeast</b>		
New York State Department of Correctional Services	NY	NY DOC
Rhode Island Department of Corrections	RI	RI DOC
Massachusetts Department of Corrections	MA	MA DOC
<b>South</b>		
Virginia Department of Corrections	VA	VA DOC
Arkansas Department of Corrections	AR	AR DOC
South Carolina Department of Corrections	SC	SC DOC
<b>West</b>		
Washington Department of Corrections	WA	WA DOC
Oregon Department of Corrections	OR	OR DOC
California Department of Corrections and Rehabilitation	CA	CA DOC
Colorado Department of Corrections	CO	CO DOC
<b>Jails</b>		
<b>Midwest</b>		
Hennepin County Adult Detention Center	MN	Hennepin County
Anoka County Jail	MN	Anoka County
Pierce County Jail	WI	WI Pierce County
Marion County Jail	IN	Marion County
Jefferson County Jail	MO	Jefferson County
<b>Northeast</b>		
Albany County Correctional Facility	NY	Albany County
Essex County Jail	MA	Essex County
<b>South</b>		
Aiken County Detention Center	SC	Aiken County
Peumansend Creek Regional Jail	VA	Peumansend Creek
Norfolk City Jail	VA	Norfolk City
Miami Dade County	FL	Miami-Dade
Alachua Regional Jail	FL	Alachua County
Pulaski County Region Detention Center	AR	Pulaski County
<b>West</b>		
Sacramento County Jail	CA	Sacramento County
Denver County Jail	CO	Denver County
Pierce County Jail	WA	WA Pierce County
<b>Juvenile Detention</b>		
<b>Midwest</b>		
Indiana Division of Youth Services	IN	IN DYS
Missouri Division of Youth Services	MO	MO DYS
<b>Northeast</b>		
Massachusetts Department of Youth Services	MA	MA DYS
<b>South</b>		
Florida Department of Juvenile Justice	FL	FL DJJ
Arkansas Juvenile Assessment	AR	AR JA
<b>West</b>		
Oregon Youth Authority	OR	OYA
California Department of Juvenile Justice	CA	CA DJJ
Colorado Division of Youth Corrections	CO	CO DYC
Ada County Juvenile Court Services	ID	ACJCS
Idaho Department of Juvenile Corrections	ID	IDJC
<b>Community Corrections</b>		
<b>Midwest</b>		
Indiana Office of the Deputy Commissioner of Reentry	IN	IN DOR
Missouri Division of Parole & Probation	MO	MO PP
<b>Northeast</b>		
Massachusetts Office of Comm. Corrections	MA	MA OCC
<b>South</b>		
South Carolina DOC- Dept. of Probation, Parole & Pardon Services	SC	SC PPP
Arkansas Department of Community Corrections	AR	AR DCC
<b>West</b>		
Washington Department of Corrections, Community Corrections	WA	WA CC
<b>Lockups</b>		
<b>Northeast</b>		
Middleton Police Department	MA	Middleton PD
<b>West</b>		
Seattle Police Department	WA	Seattle PD
Rocklin Police Department	CA	Rocklin PD
Denver County Pre-arrangement Detention Facility	CO	DCPA

<sup>1</sup> Public Law 108-79, 108th Congress. "Prison Rape Elimination Act of 2003." September 4, 2003.

<sup>2</sup>The participating state prison systems, community correction jurisdictions, juvenile correction agencies, jail and lockup facilities are collectively referred to as "sites" throughout the document. Independently, however, they will retain their respective titles.

*Prevention, Detection, Response, and Monitoring of Sexual Abuse* by NPREC. The purpose of the questionnaire, discussed in Appendixes C and D, was to solicit data, tailored to the appropriate sector, concerning the cost impact for each site and standard.

The primary role of the SMEs was to provide context behind the discussions during the interviews and background of the operating environments for each of the sites. Each SME brought a considerable amount of knowledge about PREA (a couple of SMEs having participated in the NPREC standards development) and many years of employment in the corrections industry or significant academic work in the corrections field. Balanced with Booz Allen analysts, the study's methodology ensured objectivity and independence when determining and estimating costs. Every cost for every site went through rigorous tests and verification. At no time did Booz Allen accept a site's cost estimate as final without further scrutiny, validation, and at times adjustments. This process often times resulted in prolonged communications for many weeks after the initial visit.

It is also noted that there was a wide degree of varying interpretations of certain standards despite every effort to baseline our assumptions for each of the standards during each site visit. To the greatest attempt, Booz Allen maintained open lines of communications to ensure that each site understood our questions and we subsequently understood and agreed with their response. Nevertheless, a number of costs were either subject to wide variations, unobtainable, or fraught with so much uncertainty that an approximation based on sound principles and logic was difficult to estimate. To resolve this issue, Booz Allen developed specific standard costs that were used in such instances. Each of these costs is based on the overall findings and/or reasonable assumptions in the field of corrections.

Booz Allen determined compliance based on a discussion about current practices, policies, and procedures with the site's themselves. Any claim of compliance was validated and tested by subject matter experts, policy documentation, or sufficient evidence of said claim. The scope of this project did not entail audits of their operations or whether they met any yet-to-be defined audit requirements for PREA. For example, the scope of this project did not include a workforce analysis to determine if security staff are providing inmate supervision necessary to protect inmates from sexual abuse per Standard PP3. Such an analysis would require clear auditing requirements, benchmarks, and target staffing levels for each type of facility that does not exist. Instead, the Booz Allen team relied upon the qualitative assessment of the individual site's compliance relative to reported sexual abuse incidents. When feasible, the Booz Allen team would conduct a facility tour and obtain staffing and facility plans; however, this was not possible during the majority of the site visits because many represent multiple facility systems throughout their state. For more detailed information about the Methodology, Questionnaire Development, and the actual questionnaires used in this study, see Appendixes C through E.

### *Organization of Document*

The results of the study are captured in two sections of the document: 1) Compliance Analysis and 2) Primary Cost Impacts and their Underlying Causes. The Compliance Analysis section is a discussion about the compliance of each site, sector, and standard. It highlights the compliance of each of the standards, the relative compliance rankings of the sites included in this study, and assesses compliance ranges relative to their cost estimates captured in this study. It provides a quick assessment to determine which standards are problematic and which are considered relatively easy to implement. The Primary Cost Impacts and their Underlying Causes section is a presentation of each standard that exhibits a cost,

its impact on each of the sectors, and the reasons for the cost and whether such costs are common or rare occurrences.

The Background and Scope section provides a brief history of PREA, the development of the standards, and Booz Allen's role in the review and analysis of the standards. The Methodology section details the approach of the study and the site selection criteria, followed by the Assumptions section that documents general assumptions and standard cost calculations used throughout the study.

Appendix A (Underlying Causes of Cost Impacts by Sector) presents the same findings discussed in the Primary Cost Impacts and their Underlying Causes but with additional detail. It is organized by sector so that domain/sector experts can easily glean the cost impact in their sector. Appendix B serves as a reference section for specific site-by-site characteristics and costs. The data therein is the same as Appendix A and the Primary Cost Impacts and their Underlying Causes section but organized by site with additional detail on a site's demographics, background, and characteristics.

The standards discussed in this report refer to standards as they are written for the adult jails and prisons sector in the NPREC standards. However, some variations exist among the juvenile agency, community corrections and police lockup standards. For purposes of this study, the reader can assume that each of the adult jails and prisons standards maps to their related standards in juvenile facilities, community corrections, and police lockups. For example, PP5 in adult jails and prisons maps to PP6 in police lockups; PP7 maps to PP8; PP-1 to TR2; TR-4 to TR-3; PP6 to PP7; and both SC1 and SC2 to PP4. For juvenile agencies, SC1 in adult jails and prisons maps to AP1 and SC2 maps to AP2. Likewise for community corrections, MM3 in adult jails and prisons maps to MM2 in community corrections. One standard, PP7, is not in community corrections however, so that standard does not apply to them.

## Compliance Analysis

Booz Allen began this study with the hypothesis that a site's compliance rating (i.e., how compliant a site is with the collective standards) would be a measure of its cost impact. For example, a site with a relatively low compliance rating would have higher costs than a site with a relatively higher rating. This section explores this theory by diving into the compliance rates of each site and the compliance of each standard (i.e., how many sites are compliant with each standard). The analysis indicates some general trends and correlations between a site's compliance and its costs but numerous anomalies suggest that the theory is inconclusive.

### Compliance by Standard

From a standard-by-standard perspective, there are some in which 100% of the sites included in this study are compliant and others in which no sites are compliant. Several standards have requirements that are common or best practice in most correctional facilities today and thus have high compliance rates. Other standards require policy changes, the adoption of new policies altogether and/or the enhancement of existing practices. These standards generally have moderate to low compliance rates. Some standards (such as the PREA Coordinator and PREA audits) are specific to the adoption of PREA and have very low compliance rates.

Table 2: Percent of Sites Compliance with Each Standard

Stand.	Description	% Comp.
DI1	Disciplinary sanctions for staff	98%
IN3	Evidence standard for administrative investigations	96%
RE1	Inmate reporting	96%
MM2	Access to emergency medical and mental health services	96%
DC4	Data storage, publication, and destruction	94%
OR4	Coordinated response	93%
ID6	Supplement to SC-2	90%
PP5	Accommodating inmate with special needs	88%
RP3	Agreements with outside law enforcement agencies	88%
RP4	Agreements with the prosecuting authority	88%
IN2	Criminal and administrative agency investigations	88%
DC2	Data Collection	80%
OR2	Reporting to other confinement facilities	76%
OR3	Staff first responder duties	76%
PP2	Contracting with other entities for the confinement of inmates	73%
DC3	Data review for corrective action	73%
PP3	Inmate supervision	73%
OR1	Staff and facility head reporting duties	73%
MM3	Ongoing med & mental health care for sex abuse victims and abusers	72%
RE4	Third-party reporting	71%
DI2	Disciplinary sanctions for inmates	71%
RP1	Evidence protocol and forensic medical exams	69%
SC2	Use of screening information	69%
MM1	Medical and Mental Health Screenings - history of sexual abuse	63%
OR5	Agency protection against retaliation	62%
RE2	Exhaustion of administrative remedies	59%
DC1	Sexual abuse incident reviews	59%
TR5	Specialized training: Medical and mental health care	47%
SC1	Screening for risk of victimization and abusiveness	45%
TR2	Volunteer and contractor training	43%
TR4	Specialized training: Investigations	41%
IN1	Duty to investigate	41%
PP4	Limits to cross-gender viewing and searches	39%
TR1	Employee training	37%
RE3	Inmate access to outside confidential support services	36%
PP7	Assessment and use of monitoring technology	35%
TR3	Inmate education	33%
RP2	Agreements with outside public entities and comm. ser. Providers	27%
PP6	Hiring and promotion decisions	20%
PP1	Zero tolerance of sexual abuse	8%
AU1	Audits of standards	0%

The compliance rates for each standard, as shown in Table 2, vary from 0% to 98%. A majority of the standards, 27 in total, have compliance rates between 41% and 88%. Nine of the 41 standards have compliance rates under 40%. Two standards, the PREA audit (AU1) and the PREA Coordinator (PP1), would not be expected to have any compliance since the standards have not been promulgated yet, although four sites do have staff assigned to PREA Coordinator duties.

Training and education also have low compliance rates and relatively high costs. The training and education standards, TR1 - TR5, all have compliance rates below 48%. Most sites provide some form of training and education; however many will be required to enhance their programs to include PREA specific issues. Other sites will be required to expand the training to cover all employees, contractors, and volunteers.

Six of the 41 standards have compliance rates of 90% or above. As mentioned above, several of the standards include requirements that were found to be common practice in most of the sites visited and thus have very high compliance rates. These include subjecting staff to disciplinary sanctions when Violating Agency Sexual Abuse Policy (DI1), Substantiating Sexual Abuse Allegations if Supported by a Preponderance of the Evidence (IN3), Ensuring that Offenders Have Multiple Internal ways to Report Sexual Abuse (RE1), Providing Access to Emergency Medical and Mental Health Services (MM2), Securely Storing Sexual Abuse Data (DC4), and Coordinating a Response to Sexual Abuse Allegations (OR4). No costs are associated with any of the above six standards.

**Compliance by Site**

Although NPREC standards have yet to be formally promulgated, every site included in this study has already exhibited policies and procedures to meet compliance, several demonstrating compliance with more than 80% of the standards. Many of these sites began implementing changes soon after PREA legislation was signed in 2003 and subsequently have been aided in their effort with PREA grant funding to cover implementation of new training or screening procedures. A few sites even have a salaried PREA Coordinator on staff. Despite some of the PREA policies in place however, several other sites are compliant with less than 50% of the standards.

Table 3: Site by Site Overall Compliance

Site	Sector	Percent Compliance
MA DYS	Juvenile	88%
MA DOC	Prison	85%
AR JA	Juvenile	85%
Denver County	Jail	84%
Seattle PD	Lockups	82%
OR DOC	Prison	80%
MO DYS	Juvenile	78%
CA DOC	Prison	76%
MA OCC	Community Corrections	74%
Peumansend Creek	Jail	73%
DCPA	Lockups	73%
Rocklin PD	Lockups	73%
MN DOC	Prison	71%
Essex County	Jail	70%
AR DOC	Prison	68%
RI DOC	Prison	68%
Ada Juv	Juvenile	68%
CA DJJ	Juvenile	68%
IN DOC	Prison	66%
WI Pierce County	Jail	66%
AR DCC	Community Corrections	66%
Miami-Dade	Jail	63%
SC PPP	Community Corrections	63%
CO DYC	Juvenile	63%
IN DYS	Juvenile	63%
OYA	Juvenile	63%
Middleton PD	Lockups	63%
Albany County	Jail	61%
Norfolk City	Jail	61%
MO PP	Community Corrections	61%
Aiken County	Jail	59%
Marion County	Jail	59%
Sacramento County	Jail	56%
Hennepin County	Jail	56%
WA Pierce County	Jail	56%
NY DOC	Prison	54%
VA DOC	Prison	54%
Pulaski County	Jail	54%
Jefferson County	Jail	53%
WA DOC	Prison	51%
MO DOC	Prison	49%
SC DOC	Prison	49%
Alachua County	Jail	49%
Anoka County	Jail	49%
IN DOR	Community Corrections	48%
WA CC	Community Corrections	47%
CO DOC	Prison	41%
FL DJJ	Juvenile	40%
IDJC	Juvenile	38%

As shown in Table 3, compliance among individual sites varies greatly, ranging from a high of 88% to a low of 38%. The median compliance among all sites is 63%. Collectively, lockups have the highest compliance rate, at 74%, while jails have the lowest rate at 61% illustrated in Table 4. The higher compliance rates among lockups may be a reflection of the fewer number of standards, their relative small size, and the low number of samples in this study (4). The other four sectors in this study all have relatively close compliance rates; between 67% and 61%.

MA DOC and OR DOC have the highest compliance rate among prisons, 85% and 80%, respectively. Among jails, the highest compliance rates are for Denver County and Peumansend Creek, 88% and 73%, respectively. MA DYS and AR JA have the highest compliance rates in the juvenile sector, 88% and 85%, respectively. MA OCC and the Seattle PD have the highest compliance rate for community corrections and lockups, 74% and 82%, respectively.

Table 4: Compliance by Sector

Sector	Average Compliance
Lockups	74%
Juvenile	65%
Prisons	62%
Community Corrections	61%
Jails	60%

In regard to compliance by region of the country, the data shows that in general jurisdictions in the Northeast and West tend to have higher compliance rates, but here too, there is only a loose correlation with several exceptions. Among the 10 jurisdictions with the highest compliance rates, 7 are located in the Northeast or West, while among the jurisdictions with the 10 lowest compliance rates; 6 are located in the Midwest or South. Exceptions include AR JA, MO DYS, and Peumansend Creek (located in the South and Midwest), which have relatively high compliance rates and WA DOC, WA CC, CO DOC, and IDJC (located in the West), which have low compliance rates. Among individual states, Massachusetts fares best in regards to the number of sites with high compliance rates; three of the four Massachusetts sites in this study have compliance rates that fall within the top 10.

**Compliance in Relation to Costs**

This section shows the relation between compliance levels and the cost impact for each sector. They categorize a sector's compliance level into bands and show the cost impact for each site within its respective band (e.g., 40% - 49% compliant). It is a means to validate the hypothesis whereby sites with lower compliance levels face generally higher costs to meet the PREA standards.

This study found that a loose correlation exists between compliance levels and costs, however it is inconclusive as there are a few anomalies and caveats. Generally, as the rate of compliance declines, costs increase. In other words, a site that is not compliant with many standards will exhibit a greater cost impact as opposed to a site that is compliant with relatively more standards. The primary caveat is that it depends on which specific standards a site is compliant. For example, a site that is not compliant with Assessment and Use of Monitoring Technology (PP7) will usually exhibit higher costs because of the investment required for technical modernization and retrofits. Thus a site could theoretically be compliant with 99% of the standards except PP7 yet still exhibit a significant cost impact. Technical Supervision (PP7), with a compliance rate of 35%, has the greatest upfront cost among all standards (collectively across all sites). The upfront cost is primarily associated with purchasing and installing cameras and other video technology. Prisons accounted for the vast majority of the technical supervision costs, followed by juvenile facilities and jails. Another standard with a low compliance rate that carries major costs is the Limits to Cross-Gender Viewing and Searches (PP4). This is because most prisons do

not currently prohibit cross-gender pat downs. The costs associated with this standard are primarily related to hiring more male staff to more closely match the higher proportion of incarcerated men, without compromising security.

The same can be said for jurisdictions that are not compliant with inmate supervision (PP3) and Limits to Cross-Gender Viewing and Searches (PP4) both of which are driven by the cost of labor. This is due to the high unit cost of the standard, driven by personnel salaries, ranging from \$35,000 - \$70,000 per person per year for those sites that do not believe they have an adequate number of staff to prevent sexual abuse. Large jurisdictions with many facilities that are under-staffed may require a significant number of additional full time equivalents (FTEs) to reach an adequate level, leading to a substantial increase in yearly costs.

**Prisons**

Among prisons costs are generally higher for the jurisdictions that have lower to moderate compliance rates. Falling in the 50% to 59% compliance range, NY DOC is estimated to have the highest upfront costs, while the MO DOC, in the lowest compliance range, is estimated to have the highest ongoing cost. The large upfront costs for NY DOC are primarily associated with Assessment and Use of Monitoring Technology (PP7), consisting of the purchase and installation of video surveillance equipment. The large ongoing costs for MO DOC are primarily associated with Inmate Supervision (PP3) and Limits to Cross-Gender Viewing and Searches (PP4), where costs consist of salaries for additional personnel. As noted earlier, PP7, PP3, and PP4 have the highest costs for prisons, among all the NPREC standards; indicating that the level of costs may be more strongly associated with the standards in which the jurisdictions are compliant with rather than the overall compliance rate.

The prison systems with the highest compliance rates generally have lower costs, except for IN DOC and CA DOC, which have relatively high upfront costs and ongoing costs, respectively. Falling in the 60% to 69% compliance range, the IN DOC has the third highest upfront cost, among all prison systems in the study while the CA DOC, falling in the 70% to 85% compliance range, has the third highest ongoing cost. Similar to NY DOC and MO DOC, the large upfront costs for IN DOC are entirely associated with PP7 and PP4 while the large ongoing costs for CA DOC are primarily associated with Limits to Cross-Gender Viewing and Searches (PP4).

Table 5: Prisons – Compliance Level and Cumulative Cost (\$K)

40% - 49% Compliant				50% - 59% Compliant			
	CO DOC	MO DOC	SC DOC		WA DOC	NY DOC	VA DOC
Upfront	\$3,505	\$3,227	\$4,273	Upfront	\$3,206	\$627,096	\$30,998
Ongoing	\$2,879	\$63,867	\$3,322	Ongoing	\$12,256	\$37,411	\$16,246

  

60% - 69% Compliant				70% - 85% Compliant				
	IN DOC	AR DOC	RI DOC		MN DOC	CA DOC	MA DOC	OR DOC
Upfront	\$20,055	\$286	\$803	Upfront	\$11	\$8,761	\$4,278	\$258
Ongoing	\$5,365	\$12,520	\$265	Ongoing	\$433	\$30,428	\$710	\$774

**Jails**

Among jails costs generally do not correlate closely with level of compliance. Miami-Dade, falling in the 60% to 69% compliance range is estimated to have the highest upfront and ongoing costs. But there are

some similarities with prisons. Miami-Dade's very large upfront costs are almost entirely associated with PP7, consisting of the purchase and installation of video surveillance equipment. The modestly large upfront costs for Pulaski County are primarily associated with Limits to Cross-Gender Viewing and Searches (PP4), where costs consist of a severance payout after laying off female staff. Sacramento County has a relatively low compliance rate and also among the highest costs. Sacramento County's upfront cost is primarily associated with PP7 and Specialized Training (TR4 and TR5), and its ongoing costs result primarily from Inmate Supervision (PP3).

The jails with the highest compliance rates, ranging from 70% to 88%, do generally have low costs, except for Peumansend Creek's upfront cost, which is relatively high. This again is associated with the Assessment and Use of Monitoring Technology (PP7) and Limits to Cross-Gender Viewing and Searches (PP4).

Table 6: Jails – Compliance Level and Cumulative Cost (\$K)

49% - 59% Compliant									
	Aiken County	Alachua County	Anoka County	Hennepin County	Jefferson County	Marion County	Pulaski County	Sacramento County	WA Pierce County
Upfront	\$507	\$205	\$52	\$148	\$175	\$130	\$1,874	\$1,047	\$101
Ongoing	\$29	\$797	\$312	\$118	\$598	\$124	\$124	\$5,972	\$309

60% - 69% Compliant				
	Albany County	Miami-Dade	Norfolk City	WI Pierce County
Upfront	\$20	\$25,144	\$20	\$433
Ongoing	\$1,057	\$7,281	\$124	\$433

70% - 88% Compliant			
	Denver County	Essex County	Peumansend Creek
Upfront	\$134	\$13	\$642
Ongoing	\$1	\$101	\$58

*Juvenile*

Among juvenile corrections agencies a stronger correlation exists between compliance and costs, where costs are generally higher for the jurisdictions that have lower compliance rates; however, much of this is still attributed to the specific standards with which the jurisdictions are noncompliant. The FL DJJ, which has the second lowest compliance rate among all jurisdictions in this study, has the highest upfront cost and second highest ongoing cost among the juvenile sites. The FL DJJ's upfront costs are almost entirely associated with the Assessment and Use of Monitoring Technology (PP7) while its ongoing costs are mostly related to employee training (TR1). Because FL DJJ is a large jurisdiction and much of its staff does not currently receive training specific to PREA issues; roughly 4,800 staff will require additional training.

The CO NYC and the IN DYS, both with roughly average compliance rates, also have relatively high costs. CO NYC has the second highest upfront cost, while IN DYS has the highest ongoing cost. The CO NYC's upfront costs are almost entirely associated with the Assessment and Use of Monitoring Technology (PP7); while IN DYS's ongoing costs are largely associated with Inmate Supervision (PP3).

Juvenile corrections agencies with the highest compliance rates generally have the lowest costs relative to the other sectors. The AR JA, MA DYS, and MO DYS all have compliance rates in the top 10 of all 49 jurisdictions, and have generally low costs. These costs are primarily associated with the Assessment and Use of Monitoring Technology (PP7), Training (TR1 - TR5), and Audits of Standards (AU1). It should not be a surprise that Training and Audits of Standards are within this list because they typically have lower costs relative to other standards. However, with Monitoring Technology in the list, it is noteworthy



that it does not result in higher costs since this is one of the biggest cost drivers of all the standards. With such a low cost, it suggests that juvenile agencies with high compliance rates do not require major investments in surveillance technology (among to juvenile agencies in this study).

Table 7: Juvenile – Compliance Level and Cumulative Cost (\$K)

38% - 48% Compliant			49% - 63% Compliant			
	FL DJJ	IDJC		CO DYC	IN DYS	OYA
Upfront	\$38,066	\$353	Upfront	\$17,781	\$2,607	\$4,138
Ongoing	\$4,165	\$1,266	Ongoing	\$3,383	\$4,965	\$473

  

64% - 77% Compliant			78% - 88% Compliant			
	ACJCS	CA DJJ		AR JA	MA DYS	MO DYS
Upfront	\$3	\$1,193	Upfront	\$7	\$933	\$310
Ongoing	\$115	\$3,041	Ongoing	\$85	\$574	\$310

**Community Corrections**

Among community corrections jurisdictions costs also do not generally correlate closely with level of compliance. IN DOR has the lowest compliance rates in the study but also has relatively low costs. IN DOR is compliant with many standards associated with the highest costs such as Inmate Supervision (PP3) and Limits to Cross-Gender Viewing and Searches (PP4). Note that the standard for the Assessment and Use of Monitoring Technology (PP7), a major cost driver for many jurisdictions in other sectors, does not apply to community corrections.

The AR CC and MO PP, both falling in the 59% to 69% compliance range, have the highest ongoing costs in community corrections; the costs for both jurisdictions are primarily associated with Limits to Cross-Gender Viewing and Searches (PP4). The WA CC, in the lowest compliance range, has the highest upfront costs. Unlike many other jurisdictions the upfront costs for WA CC are not concentrated in any one standard rather, they are spread across numerous standards, including Employee Training (TR1), Specialized Training (TR4 and TR5), Screening (SC1 and SC2), and Gathering, Reviewing and Reporting Data Standards (DC1 - DC3).

Table 8: Community Corrections – Compliance Level and Cumulative Cost (\$K)

48% - 58% Compliant			59% - 69% Compliant			70% - 75% Compliant	
	IN DOR	WA CC		AR DOC	MO PP	SC PPP	MA OCC
Upfront	\$33	\$184	Upfront	\$49	\$47	\$53	\$129
Ongoing	\$50	\$1,267	Ongoing	\$1,997	\$1,757	\$88	\$315

**Lockups**

Among the four lockups in this study, costs do not correlate at all with the compliance level most likely because there is simply a smaller sample. In fact, the lockup with the highest level of compliance, Seattle PD, also has the highest costs. Seattle PD’s major cost is for Accommodating Inmates with Special Needs (PP5)<sup>3</sup>. Standard PP5 is unique in that it is only a major cost factor for lockups. In addition to the Seattle PD, the Rocklin PD and the DCPA also have relatively high costs associated with PP5. This is unique to the lockup sector because only three other jurisdictions across all other sectors are not compliant with this standard; the overall compliance rate for the standard is 88%. The Seattle PD has by

<sup>3</sup> PP5 maps to PP4 in the standards for lockups

far the largest cost associated with PP5 among all lockup facilities in this study. As a whole, 99.7% of all ongoing costs associated with standard PP5 are in the lockups sector while 92% of the upfront costs for PP5 are also in lockups.

Table 9: Lockups – Compliance Level and Cumulative Cost (\$K)

60% - 69% Compliant		70% - 79% Compliant			80% - 89% Compliant	
	Middleton PD		DCPA	Rocklin PD		Seattle PD
Upfront	\$5	Upfront	\$65	\$19	Upfront	\$28
Ongoing	\$81	Ongoing	\$77	\$802	Ongoing	\$3,051

## Primary Cost Impacts and their Underlying Causes

This section discusses the standards exhibiting a notable cost impact based on the 49 sites included in this study. This discussion covers 29 standards listed according to magnitude of the ongoing cost impact from highest to lowest. Although there are clearly some relatively significant upfront costs that overshadow the ongoing costs (e.g., PP7), prioritizing the standards by ongoing costs emphasizes the long-term cost impact as a result of the standards and the belief that significant adjustments to annual base funding allocations are more difficult to secure than one-off investments, particularly in today's economy where state and local budgets are under increased scrutiny. Table 10 shows the 29 standards with notable costs sorted from highest-to-lowest ongoing costs. These are total costs across all sectors and do not take into account unique sector characteristics and resulting cost impacts that this narrative will address. The following pages only address the standards that have a notable cost impact.

Table 10: Standards with Notable Costs and the % of Total Costs

Standard		Total Costs (\$K)	
		Upfront	On-Going
PP4	Limits to cross-gender viewing and searches	\$21,293	\$89,974
PP3	Inmate supervision	\$1,665	\$88,848
PP7	Assessment and use of monitoring technology	\$770,634	\$20,354
MM3	Ongoing medical and mental health care for sexual abuse victims and abusers	\$12	\$5,773
	Contracting with other entities for the confinement of inmates	\$0	\$5,695
AU1	Audits of standards	\$0	\$5,167
TR1	Employee training	\$4,484	\$4,375
PP1	Zero tolerance of sexual abuse	\$48	\$3,768
RP2	Agreements with outside public entities and community service providers	\$33	\$1,611
	Use of screening information	\$170	\$1,605
RP1	Evidence protocol and forensic medical exams	\$25	\$1,396
IN1	Duty to investigate	\$18	\$1,264
ID6	Supplement to SC-2	\$9	\$746
SC1	Screening for risk of victimization and abusiveness	\$530	\$677
PP6	Hiring and promotion decisions	\$4	\$284
RP3	Agreements with outside law enforcement agencies	\$21	\$258
	Agreements with the prosecuting authority	\$21	\$250
DC3	Data review for corrective action	\$352	\$176
TR3	Inmate education	\$458	\$161
TR5	Specialized training: Medical and mental health care	\$1,462	\$153
TR2	Volunteer and contractor training	\$572	\$142
DC1	Sexual abuse incident reviews	\$2	\$126
RE2	Exhaustion of administrative remedies	\$6	\$105
IN3	Evidence standard for administrative investigations	\$1	\$79
	Data Collection	\$17	\$72
PP5	Accommodating inmate with special needs	\$2	\$47
TR4	Specialized training: Investigations	\$316	\$15
OR5	Agency protection against retaliation	\$500	\$0
RE3	Inmate access to outside confidential support services	\$98	\$0

Table 10 also shows the standard's relative proportion of total costs. This is calculated by dividing the total costs for each standard divided by the grand total (separately for ongoing and upfront). This pinpoints very quickly which standards are the largest cost drivers, highlighting three in particular (PP4, PP3, and PP7). These three standards account for 99% of all upfront costs and PP7 accounts for 96% of all upfront costs. This is attributed primarily to undefined and misinterpreted requirements based on the current language of the standard. Two standards (PP3 and PP4) account for 76% of all ongoing costs, solely driven by increased staffing required to meet the intent of the standards as they are written.

Another means to determine the relative cost impact and its magnitude is to compare a site's overall cost impact to its annual operating budget. This can provide a measure of the relative impact on a site's daily operations and whether it can or cannot absorb the additional costs as a result of PREA. Tables 11 and 12 (one for annual, ongoing costs; another for one-time, upfront costs) depict the cost impacts by standard across each of the five sectors. The Harvey Balls™ represent an order of magnitude distinguishing between relatively low and high costs. They are based on a percentage of the annual aggregate operating budget for each sector. Standards that do not result in any cost impact for any sector are not depicted in the tables. The degree to which each Harvey Ball is shaded indicates the magnitude of the cost impact, or

percentage of the overall operating budget. An empty ball ○ represents standards that do not result in any cost impact. A quarter-shaded ball ◑ represents an overall impact on annual operating budget between 0% and 0.25%, while a half-shaded ball ◒ represents an impact between 0.25% and 0.50%. A fully-shaded ball ● represents any percent impact on annual operating budget that is greater than 0.50%. For example, Inmate Supervision for prisons is represented by a fully-shaded Harvey Ball. The aggregate costs for this standard is 0.51% of the aggregated sites' operating budget. In Table 11, the same fully-shaded symbol for prison has an upfront percent impact of 4.83% on prisons' Assessment and Use of Monitoring Technology (PP7). The primary reason for the significantly higher percentage is attributed to the investment required for technical modernization and retrofits. Thus a site could theoretically be compliant with 99% of the standards with the exception of PP7 but would still exhibit a large cost impact.

Table 11: Ongoing Cost Impacts as % of Annual Operating Budget

Priority		Prisons	Jails	Juvenile	Comm. Corr.	Lockups
1	Limits to cross-gender viewing and searches	●	◑	◑	●	●
2	Inmate Supervision	●	●	◒	◑	○
3	Assessment and use of monitoring technology	◑	◑	◑	n/a	○
4	Ongoing medical and mental health care	◑	◑	◑	○	n/a
5	Audits of standards	◑	◑	◑	◑	◑
6	Training and education	◑	◑	◒	◑	◑
7	Contracting with other entities for the confinement of inmates	◑	◑	◑	◑	○
8	Accommodating inmates with special needs	◑	◑	○	◑	◑
9	Zero tolerance of sexual abuse	◑	◑	◑	◑	◑
10	Screening for risk of sexual abuse	◑	◑	◑	○	◑
11	Contract modifications for outside services	◑	○	◑	◑	○
12	Evidence protocol and forensic medical exams	◑	◑	◑	◑	○
13	Investigations	◑	◑	◑	○	○
14	Supplement to SC-2: Use of screening information	○	◑	n/a	n/a	n/a
15	Hiring and promotion decisions	◑	◑	◑	◑	◑
16	Gathering, reviewing, and reporting data	◑	◑	◑	◑	○
17	Exhaustion of administrative remedies	◑	◑	○	○	○
18	Agency protection against retaliation	○	○	○	○	○

As shown in these tables, only three standards have fully filled Harvey Balls, the same referenced earlier (PP4, PP3, and PP7). These are considered the most problematic in terms of both compliance and cost impact.

Table 12: Upfront Cost Impacts as % of Annual Operating Budget

Priority		Prisons	Jails	Juvenile	Comm. Corr.	Lockups
1	Limits to cross-gender viewing and searches					
2	Inmate Supervision					
3	Assessment and use of monitoring technology				n/a	
4	Ongoing medical and mental health care					n/a
5	Audits of standards					
6	Training and education					
7	Contracting with other entities for the confinement of inmates					
8	Accommodating inmates with special needs					
9	Zero tolerance of sexual abuse					
10	Screening for risk of sexual abuse					
11	Contract modifications for outside services					
12	Evidence protocol and forensic medical exams					
13	Investigations					
14	Supplement to SC-2: Use of screening information			n/a	n/a	n/a
15	Hiring and promotion decisions					
16	Gathering, reviewing, and reporting data					
17	Exhaustion of administrative remedies					
18	Agency protection against retaliation					

With a few exceptions, this section addresses each standard with an ongoing cost percentage greater than zero, presented in order of the greatest cost impact to the least. The exceptions include the Training Standards (TR1 through TR5); the Screening Standards (SC1 and SC2); Gathering, Reviewing and Reporting Data Standards (DC1 through DC3), Investigations (IN1 and IN3) and Contract Modifications for Outside Services (RP2 though RP3 and RE3). Each is bundled together because Booz Allen believes that each is either dependent on the other (e.g., data reviewing or screening standards) or is tied logically to the other based on its similarities in breadth and scope (e.g., training, investigations, and the contract modification standards). As such, the cost impact for these standards is first presented as an aggregate cost followed by specific standard detail in the narrative.

Each standard or cost impact is first described in context of our overall findings, regardless of sector. However, because of the relatively significant variations between the sectors, this is followed by a brief summary of the cost impact on each of the five sectors. Finally, all costs are presented in thousands of dollars.



















































































































































































































































































































































































































































































































































































































































































































































































































































































































