

PREA Facility Audit Report: Final

Name of Facility: John I. Easley Criminal Justice Center

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 11/24/2017

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
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.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Adam Eugene Hopkins	Date of Signature: 11/24/2017

AUDITOR INFORMATION	
Auditor name:	Hopkins, Adam
Address:	
Email:	adam@lumicoretraining.com
Telephone number:	
Start Date of On-Site Audit:	06/26/2017
End Date of On-Site Audit:	06/29/2017

FACILITY INFORMATION	
Facility name:	John I. Easley Criminal Justice Center
Facility physical address:	Williamson County Sheriff's Office, 408 Century Court, Franklin, Tennessee - 37064
Facility Phone	615-790-5560
Facility mailing address:	
The facility is:	<input checked="" type="radio"/> County <input type="radio"/> Federal <input type="radio"/> Municipal <input type="radio"/> State <input type="radio"/> Military <input type="radio"/> Private for profit <input type="radio"/> Private not for profit
Facility Type:	<input type="radio"/> Prison <input checked="" type="radio"/> Jail

Primary Contact			
Name:	John Bevans	Title:	PREA Coordinator
Email Address:	johnbevans@williamson-tn.org	Telephone Number:	615-790-5560 3269

Warden/Superintendent			
Name:	Captain Mike Dobbins	Title:	Facility Administrator
Email Address:	mikedobbins@williamson-tn.org	Telephone Number:	615-790-5560 3259

Facility PREA Compliance Manager			
Name:		Email Address:	

Facility Health Service Administrator			
Name:	Daren Leonard	Title:	RN-MTA
Email Address:	darenleeleonard@gmail.com	Telephone Number:	615-790-5560 3305

Facility Characteristics		
Designed facility capacity:	454	
Current population of facility:	337	
Age Range	Adults: 18-90	Youthful Residents: N/A
Facility security level/inmate custody levels:	Protective Custody	
Number of staff currently employed at the facility who may have contact with inmates:	299	

AGENCY INFORMATION	
Name of agency:	Williamson County Sheriffs Office
Governing authority or parent agency (if applicable):	
Physical Address:	408 Century Court, Franklin, Tennessee - 37064
Mailing Address:	
Telephone number:	615-790-5560

Agency Chief Executive Officer Information:			
Name:	Jeff Long	Title:	Sheriff
Email Address:	jeffl@williamson-tn.org	Telephone Number:	615-790-5560

Agency-Wide PREA Coordinator Information			
Name:	John Bevans	Email Address:	johnbevans@williamson-tn.org

AUDIT FINDINGS

Narrative:

The auditor's description of the audit methodology should include a detailed description of the following processes during the pre-audit, on-site audit, and post-audit phases: documents and files reviewed, discussions and types of interviews conducted, number of days spent on-site, observations made during the site-review, and a detailed description of any follow-up work conducted during the post-audit phase. The narrative should describe the techniques the auditor used to sample documentation and select interviewees, and the auditor's process for the site review.

On June 26 - 29, 2017 Adam Hopkins, Department of Justice certified auditor and President of Lumicore Training, LLC, conducted an on-site visit as part of the PREA audit of the Williamson County Sheriff's Office in Franklin, Tennessee. The Office point of contact was Sergeant John Bevins, PREA Coordinator for the Sheriff's Office.

PRE-AUDIT PROCESS

Audit notices were supplied and posted throughout the facility six weeks prior to the on-site review. Email documentation of the notices being sent, received and posted demonstrate the timely posting of the notices. Auditor has not received any correspondence or mail at the WCSO PREA Audit mail address.

The pre-audit activities included a completion of the Pre-Audit Questionnaire by the PREA Coordinator. PREA Coordinator provided the documentation for pre-audit reviews and activities. Auditor was provided and reviewed Administrative Regulations, Operational Procedures and documentation reflecting what processes were actually employed to prevent, detect and respond to sexual victimization, training curriculum, organizational charts, posters and Inmate Handbook. All material were provided to demonstrate compliance with the PREA standards. Frequent phone conversations with the PREA Coordinator to discuss deficiencies or needed material were had prior to the on-site visit. Interviews of Specialized Staff such as the Rape Crisis Call Center and the community health provider were conducted by phone.

ON-SITE AUDIT

Auditor conducted an entrance conference with facility administration on June 26, 2017. This conference focused on the audit schedule and an overview of the process. Present at the entrance conference were the PREA Coordinator, Division Lieutenant, Division Commander, Division First Sergeant and the Auditor. Following the entrance conference, the following four hours were occupied by the facility tour. Auditor was provided a private office to use as a base of operations. All required interviews and document reviews were discussed each morning with the PREA Coordinator.

The facility tour was conducted by the PREA Coordinator and consisted of an inspection of every housing area of the one facility which falls under the span and control of the Sheriff's Office and PREA Coordinator, all critical service areas, program areas, maintenance areas, administrative offices and Law Enforcement areas of the Sheriff's Office. All of the areas visited during the site tour were in the one building which houses the entire operation of the Sheriff's Office. During the facility tour Auditor selected random housing units within each area of the facility to speak informally with inmates who were selected at random within those units.

During the facility tour, Auditor noted one issue regarding privacy within all, standard cells with doors. These issues have been discussed within the appropriate audit standards. As discussed in the standards,

the noted issues were resolved during the onsite audit and are in place at this time. Agency has installed over one half million dollars over the past fourteen years in camera installation and monitoring equipment. Auditor found only one area where an inmate used for cleaning duties was unmonitored by a camera. That area was discussed at length with the PREA Coordinator and again during the out briefing with the Sheriff and command staff.

The PREA Coordinator and command staff were directed by the Sheriff to install a camera in the identified area to solve the supervision issue. Auditor could not find any area within the facility which was not either staffed with a deputy or monitored by camera. Auditor found no line of site issues, inside or outside of the facility.

The balance of the on-site audit, was taken up by interviews and document reviews.

Auditor was given full access to all documentation needed for the audit. Much of the documentation was provided pre-audit, however, while on site, auditor reviewed documentation of intake classifications, agency's record management system to confirm time frames for bookings and inmate housing management, and the medical records system. Numerous random and formalized interviews were conducted with inmates. Auditor requested and was provided housing unit rosters each day of the on-site audit. Thirty three inmates were interviewed including an inmate who identified as a member of the lesbian/gay/bisexual/transgender/intersex (LGBTI) population of the jail, inmates who were screened as being at high risk for sexual victimization, inmates assigned to the segregation unit as well as a random sample of inmates. The Williamson County Sheriff's Office does house youthful offenders, however, there were no youthful offenders being housed during the onsite audit or for the previous 12 month period. There was one inmate who was limited English proficient, however, he refused to be interviewed.

In addition to inmate interviews, document reviews and facility inspection, thirty staff members were interviewed, including senior management, medical staff, human resources, behavioral health, members of the sexual abuse incident review team, investigators, and a random number of correctional officers. Random staff interviews were selected from staff working in each area of the facilities on the shifts working at the time. Auditor conducted interviews of inmates and staff at different times throughout the day starting at 0800hrs and ending at 2300hrs, which allowed for interviews of staff on all shifts. Specialized staff were chosen based on assignment within the agency. Staff interviews were conducted in a private office or individual offices for specialized staff.

Auditor conducted an exit conference with Division Command Staff and PREA Coordinator and various other Sheriff's Office staff on the afternoon of June 29, 2017. Agency administration and staff were very open and receptive to an honest discussion of areas where PREA compliance needs to be strengthened and the PREA compliance team began corrective measures immediately.

DOCUMENTS AND FILES REVIEWED

During the PRE-AUDIT, ON-SITE AUDIT and POST-AUDIT phases, Auditor reviewed agency Policies/Procedures, training material, proof of training, Inmate Handbook, PREA posters, classification documents, records management system documenting random checks, cases involving sexual abuse/harassment, daily housing unit rosters, staffing matrix, Intake forms, program/services schedules, facility diagrams and agency website. Auditor used several techniques in choosing sample documentation. Auditor requested specific documents or files such as the Inmate Handbook and PREA training documentation. When inmate files were needed, Auditor used the daily housing rosters provided by the PREA Coordinator and would request the files of every fourth inmate. Auditor also requested Agency to provide sample cases confirming adherence to PREA standards in the areas of investigations,

evidence collection and preservation and Internal affairs. Agency was directed to provide samples with no specification as to how the cases were chosen. Regarding training topics and training documentation, Agency provided full Powerpoint presentations and scanned copies of documentation signed by staff who attended the PREA based training. Intake files were chosen from an alphabetical file where one file was selected from each section of the alphabetical system used.

DISCUSSIONS AND TYPES OF INTERVIEWS CONDUCTED

Auditor had an entrance and exit conference with Division Command staff and PREA Coordinator. Auditor conducted daily coordination meetings with the PREA Coordinator prior to the start of the day during the on-site audit. Auditor conducted informal interviews with Inmates and staff during the site tour. The informal interviews were within housing areas, individual housing units, control rooms and while Auditor was being escorted by commissioned staff throughout the on-site audit. Auditor also conducted formal interviews with Inmates, commissioned staff, volunteers, contract employees and those who provide services such as victim advocacy as well as resources such as the local Rape Crisis Call Center. The formal interviews were conducted in a private office and individual offices of specialized staff.

The methodology for selecting inmates for random interviews was, using the daily housing rosters, to mark every fourth inmate on the rosters and personally contact the inmates starting with the first marked inmate. Auditor asked the inmates if they would like to participate in the audit by being interviewed. No further information was given to the inmates regarding the interviews. Auditor contacted every fourth inmate until an inmate consented to be interviewed and the consenting inmate was brought to the private interview room. The same process was utilized with those inmates needed for specialized inmate interviews. No inmates communicated with Auditor prior to the onsite audit. No communication from staff or inmates has been received, post onsite audit. Random staff interviews were chosen from the daily staff rosters provided on a daily basis. Random staff interviews were conducted in a private office provided by the Agency.

OBSERVATIONS MADE DURING SITE-REVIEW

The WCSO has made PREA compliance a priority. Agency has spent time, money and resources in their efforts to become PREA compliant. Policies reflect PREA Standards in all areas. Training on PREA is conducted regularly and is evident when interviewing staff. Agency moves quickly to make needed changes such as the reclassification of the PREA Coordinator position, which agency has already made. Agency struggles with PREA compliance in the South Annex due to the age of the facility and limitations based on construction. Agency is in the planning stages of a new facility to replace the current facility within the next five to seven years. Auditor suggested Agency include a PREA auditor in the planning of this new facility, which Agency leadership is planning on doing. Agency is non-compliant in several areas, however, there are no major deficiencies which would prevent the WCSO from becoming fully compliant within the corrective action period.

FOLLOW-UP WORK

Post audit follow-up work consisted of outlining deficiencies within the audit which need corrective action by Agency and requesting additional documentation regarding medical and the use of a standardized form advising of the medical providers duty to report certain information. Agency is also working on an MOU with the local Crisis Call Center and a local police agency who can take PREA related calls which will then be passed on the WCSO staff for follow up. Agency is also updating the PREA posters in each housing unit and will send photographs of the changes to provide evidence of the changes. Sergeant Bevins has supplied additional documentation necessary to make conclusive findings in several areas of the audit. Auditor has made several calls to WCSO staff to clarify policy in various areas such as training

for the victim advocate provided by Agency. Auditor has communicated the areas in need of corrective action with the PREA Coordinator. Auditor is in frequent conversation regarding corrective actions and status of the corrections.

In summary, after reviewing all pertinent information and after conducting the onsite audit, inmate interviews and staff interviews, the Auditor found that agency leadership and staff have clearly made PREA compliance a high priority and have devoted a significant amount of time and resources to policy development, training of staff and education of inmates on all the key aspects of PREA. Discussions with agency leadership and facility management reinforced the agency's commitment to ensuring the sexual safety of inmates and staff in the facility. It was further evident that staff and inmates were invested in PREA as demonstrated through their knowledge and understanding of the protections and requirements. The positive culture of sexual safety in this facility is evident in the overall operations of this facility and the level of PREA compliance noted by this Auditor. While there are certain areas of compliance that will require strengthening through corrective actions as detailed in this report, those corrections are relatively easy to accomplish and the Auditor expects full compliance will be achieved soon. As a result of the exit conference with WCSO Division Command staff, the compliance team immediately began their corrective actions prior to receiving this report. Because of this initiative, the facility will reach full PREA compliance quickly.

AUDIT FINDINGS

Facility Characteristics:

The auditor's description of the audited facility should include details about the facility type, demographics and size of the inmate or resident population, numbers and type of staff positions, configuration and layout of the facility, numbers of housing units, description of housing units including any special housing units, a description of programs and services, including food service and recreation. The auditor should describe how these details are relevant to PREA implementation and compliance.

The Williamson County Sheriff's Office, located at 408 Century Court, Franklin TN is responsible for the operation of a single detention facility. The WCSO is responsible for providing professional law enforcement services to just under 600 square miles and almost 220,000 county residents. The race breakdown of Williamson County is 89.5% Caucasian, 4.4% African American, 4.6% Hispanic, 4.2% Asian and less than 1% American Indian. The average household income is \$96,500 annually and the percentage of residents who have graduated from high school is 95.3% with 55.7% having a bachelors degree or higher. The WCSO has approximately 299 employees with 96 commissioned Correctional Officers to run the WCSO Jail. The design capacity of the facility is 454 inmates with an Average Daily Population (ADP) of 337 inmates. There have been no newly renovated portions of any of the facility since August 20, 2012.

DETENTION CENTER

The Detention Center was built in 1984 with a design capacity of 454 inmates. The Detention Center has a design where staff enter the housing units on a very frequent basis, but are not stationed within the housing unit. The staff work stations are outside of the units and there is an elevated control room above each housing area. There are 14 male pods on two floors. Each pod houses a minimum of 8 inmates to a maximum of 30 inmates. The inmates housed in the Male Housing pods are a mix of General Population, miscellaneous classification levels, disciplinary segregation, administrative segregation, suicidal inmates, protective custody, sentenced felons, sex offenders, sentenced misdemeanants and trustees. Male housing pod #1, general population units are open bay units with no individual cells, common toilets and showers used individually by each inmate. Male housing pod #1, unit #305 has 1 individual cells with two bunks and a sink/toilet combination in each. One cell is single bunked with a sink/toilet combination used for temporary holding of an inmate. Each cell is designed to hold 2 inmates with one cell designed for temporary housing of a single inmate. Male housing pod #1, unit #309 has 12 individual cells with two bunks and a sink/toilet combinations in each. Each cell is designed to house two disciplinary segregated inmates. Male housing pod #1, unit #310 has 8 individual cells with tow bunks and a sink/toilet combination in each. Each cell is designed to hold a single two administrative, suicidal or disciplinary inmates if necessary. Male housing pods #1 and #2 are separated by two outside activity yards shared by inmates from both pods. The main laundry and a large multi-purpose room are both located between the two pods.

Connected to Male housing pod #1 is the only female housing pod. This pod is made up of units #506, #508 and #519. Unit #506 houses 56 general population inmates in an open bay, dormitory style housing unit, with common bathrooms and showers which are used individually by each inmate. Housing unit #508 has 8 individual cells with two bunks with sink/toilet combinations in each. Each cell is designed to house two administrative, disciplinary or suicidal inmates. One cell is single bunked with its own shower, occasionally used for special medical needs. Housing unit #519 has 8 individual cells with two bunks with sink/toilet combinations in each. Each cell is designed to house two protective custody or

medical separation inmates. One cell is single bunked with its own shower, occasionally used for special medical needs. All female housing units share a common outside activity yard, adjacent to unit #506.

The work release or work detail unit is connected to the male housing pod #2 by an access hallway. The work release units are open bay, dormitory style units with bunk beds and no individual cells. This unit is designed to house 56 work detail inmates. The units share a common bathroom and shower area which is used individually by each inmate.

There is one specialty housing unit which is located between the medical unit and the female housing units. This unit consists of three pods, two pods with four cells each, two bunks in each cell with sink/toilet combinations and designed to hold two inmates for a variety of classification needs. One pod has two, single bunked cells with sink/toilet combinations, designed to hold a single inmate for a variety of classification needs. There is a common shower area that each inmate uses individually. The cells surround a control room on the same level as the cells which is surrounded by a glass barrier. This unit sits unused most of the time and is used to house youthful offenders when there is a youthful offender in custody. This unit offers separation from sight and sound of adult inmates. Human resources and PREA Coordinator offices are located directly in front of the specialty housing unit off of the main hallway.

The medical unit is located on the main hallway between the specialty housing unit outside activity yard and the Detention Administrative offices. The medical unit consists of administrative offices, exam rooms and 4 single occupancy cells with toilet/sink combinations. Inmates are not housed in the medical unit for extended periods of time unless there were exigent circumstances.

The Intake/Booking area is connected to the medical unit and just behind the Detention Administrative offices. Intake consists of booking areas, fingerprint and classification areas, property room, sally port, 5 holding cells for males and 1 large holding cell for females.

Program rooms, Programs Coordinators office is located in the main hallway, directly across from the specialty housing unit. The kitchen is located directly behind the programs area off of the main hallway.

The Central Control area is located at the head of the main hallway looking directly toward the male housing pods. Access through all doors within the detention facility are controlled electronically either by Central Control or the Control rooms located in each housing area. Key card access for authorized employees for hallway doors is also used. There is no key card access for staff into any housing unit.

The main physical plant for the facility is located outside the secure facility but within the perimeter fencing. There is a maintenance shop also within the perimeter fencing connected to a car wash area, staffed by two inmates. All areas outside the secure facility are also equipped with video monitoring equipment inside and outside of all buildings and monitored by Central Control. The WCSO utilizes an abundance of video cameras located throughout the interior of the facility, on exterior grounds, recreation areas, program areas and walkways. No cameras were located in shower/toilet areas outside of individual cells. Cameras within cells had the toilet area blocked to eliminate viewing of inmates toileting. Auditor observed the video feed in Central Control as well as all housing pod control rooms. Auditor found the number and locations of cameras throughout the facility to be more than optimal, leaving no observable blind spots.

Staffing per shift for the detention facility is broken down by shift. First shift, from 0600 hrs to 1400 hrs, is staffed with a minimum of 11 Deputies and at least one Sergeant. As staffing allows, three Corporals are

included as supervisory staff. Second shift, from 1400 hrs to 2200 hrs, is staffed with a minimum of 11 Deputies and at least one Sergeant. As staffing allows, three Corporals are included as supervisory staff. Third shift, from 2200 hrs to 0600 hrs, is staffed with a minimum of 10 Deputies and at least one Sergeant. As staffing allows, three Corporals are included as supervisory staff. Inmate transports can be performed by on shift Deputies as staffing allows, however, during business hours, the Transport Deputies located at the courthouse, perform needed inmate transports. There are anywhere from four to six Deputies assigned to the Transport unit. One Deputy is on call for inmate transports during non business hours.

Inmates are allowed recreation time in designated recreation areas or within their individual pods. Food service provided for all units is completed with the use of inmate labor. Food is prepared in the main kitchen and delivered to each pod within the facility. Inmate services provided to inmates housed on any of the housing units include but are not limited to: Various religious programs, recovery programs, education classes and parenting skills. The facility has inadequate lighting conditions and adequate air conditioning.

Unique features of the WCSO include:

1. A centralized Human Resource office
2. Agency has chosen to use video monitoring equipment in all areas of the facility to include individual cells
3. Agency has the capacity to house youthful inmates out of sight and sound of adult inmates

AUDIT FINDINGS

Summary of Audit Findings:

The summary should include the number of standards exceeded, number of standards met, and number of standards not met, along with a list of each of the standards in each category. If relevant, provide a summarized description of the corrective action plan, including deficiencies observed, recommendations made, actions taken by the agency, relevant timelines, and methods used by the auditor to reassess compliance.

Auditor Note: No standard should be found to be "Not Applicable" or "NA". A compliance determination must be made for each standard.

Number of standards exceeded:	3
Number of standards met:	42
Number of standards not met:	0

Number of standards exceeded: 3

* 115.18; 115.33; 115.62

Number of standards met: 38

* 115.11; 115.12; 115.13; 115.14; 115.16; 115.17; 115.21; 115.22; 115.31; 115.32; 115.34; 115.35; 115.41; 115.42; 115.43; 115.52; 115.54; 115.63; 115.64; 115.65; 115.66; 115.67; 115.68; 115.71; 115.72; 115.73; 115.76; 115.77; 115.78; 115.81; 115.82; 115.83; 115.86; 115.87; 115.88; 115.89; 115.401; 115.403

Number of standards not met: 4

* 115.15; 115.51; 115.53; 115.61

Number of standards N/A: 1

* 115.12

All inmates who were interviewed cooperated with the interview process. Mental health services had to be arranged for inmates following their interviews if needed. Numerous inmates reported that they fully trusted WCSO staff and felt comfortable reporting PREA incidents if necessary. Inmates reported that grievances submitted for various reasons were handled satisfactorily and in a timely manner. While many inmates confirmed that the agency provided them PREA information during the booking process, several inmates stated they were not. This assertion is contradicted by the presence of PREA related information posted throughout the facility, PREA related questions asked during the initial screening and the presence of PREA documentation in every file checked by Auditor. PREA information is presented in all of these formats confirmed by viewing the intake classification form, viewing PREA posters in several languages throughout the facility. Agency has a formal mechanism to notate that every inmate has received this information. The required ongoing training of inmates is being accomplished through the technology in place in all inmate housing units. Inmates indicated during their interviews that they knew the various mechanisms for reporting sexual abuse, the services available to victims of sexual abuse and had been advised of prevention strategies. The few inmates who were not aware of these topics, were educated during the interview. During the facility tour, Auditor was able to talk to inmates openly and without hesitation by the inmates. A corrections officer was in each pod during the interview for safety

purposes. Their presence did not hinder the interviews in any way. Agency staff, contracted employees and volunteers cooperated fully with the interviews and all expressed support for the goals of PREA. All staff, contracted employees and volunteers indicated that they had received training on PREA in hours commensurate with their level of inmate contact. This training was corroborated by acknowledgement forms and training logs provided by the agency.

CORRECTIVE ACTION PLANNING

The corrective action plans for the areas not met are not extensive and have to do with proof of training for one employee, securing and using an outside agency for reporting, securing and using an outside victim advocate service and implementation of a medical form in Intake. Where changes in procedure are required, those changes have been outlined in the body of the audit and are being made at the agency level. All of the changes required for full compliance can be accomplished within the 180 day corrective action period if not sooner. Compliance assessment will be done by having agency send, via email, updated policies and relevant documentation of compliance.

NOVEMBER 24, 2017 UPDATE SINCE THE AUDIT: CORRECTIVE ACTIONS TAKEN TO ACHIEVE FULL COMPLIANCE

The Interim Compliance Report reflected that there were 4 standards that were in non-compliance at the Williamson County Sheriff's Office (WCSO). Therefore, a required correction action period not to exceed 180

days began on September 19, 2017. The Auditor recommended corrective actions for the facility and administration agreed and began immediate corrections of those standards found to be in noncompliance.

WCSO completed the required corrective actions requested by the Auditor to bring the facility into full compliance with the PREA standards. Evidence of corrective actions was received by the Auditor throughout the corrective action period. The Auditor reviewed the submitted documentation to determine if full compliance was achieved. In some cases, the Auditor requested clarifications and/or additional documentation via emails and phone calls with WCSO staff. WCSO complied with all requests from Auditor. A summary of the evidentiary basis for determining full compliance is discussed within each standard that was originally noncompliant. As a result of successful corrective action, the Auditor determined that the WCSO has achieved full compliance with the PREA standards as of the date of this final report.

The summary of compliance based upon this final report is found below.

Number of standards exceeded: 3

* 115.18; 115.33; 115.62

Number of standards met: 42

* 115.11; 115.12; 115.13; 115.14; 115.16; 115.17; 115.21; 115.22; 115.31; 115.32; 115.34; 115.35; 115.41; 115.42; 115.43; 115.52; 115.54; 115.63; 115.64; 115.65; 115.66; 115.67; 115.68; 115.71; 115.72; 115.73; 115.76; 115.77; 115.78; 115.81; 115.82; 115.83; 115.86; 115.87; 115.88; 115.89; 115.401; 115.403; 115.15; 115.51; 115.53; 115.61

Number of standards not met: 0

Number of standards N/A: 1

* 115.12

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.

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. WCSO Organizational chart 4. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Division Lieutenant <p>115.11 (a) The 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.</p> <p>Agency policy 10.6.002, page 4, section A 1, provides the agency mandate of zero tolerance toward all forms of sexual abuse and sexual harassment. This policy in its entirety, outlines agencies approach to preventing, detecting and responding to sexual abuse and sexual harassment conduct. Auditor reviewed this policy to ensure that it met this element and that all aspects of this policy were in place to met this element.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.11 (b) The 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.</p> <p>Agency has designated an agency-wide PREA Coordinator with sufficient time and full authority to develop, implement and oversee PREA efforts and to ensure compliance. Agency has designated a Sergeant as their PREA Coordinator with a Corporal as the PREA Compliance Manager. While in many agencies, the rank of Sergeant would not be considered an upper-level position, in questioning the Detention Division Captain and Lieutenant, they assured auditor that the current PREA Coordinator position has absolute authority to develop, implement and oversee PREA efforts and to ensure compliance. These positions are delineated on the Organizational chart provided to auditor.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.11 (c) 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.</p> <p>Agency operates only one facility.</p> <p>FINDING: N/A</p>

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2. WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Division Lieutenant c. Detention Division Captain <p>115.12 (a) A public agency that contracts for the confinement of its inmates 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.</p> <p>Agency does not contract with any other agency to house their inmates</p> <p>FINDING: N/A</p> <p>115.12 (b) Any new contract or contract renewal shall provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards.</p> <p>FINDING: N/A</p> <p>CORRECTIVE ACTION: NONE</p>

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2. WCSO policy 10.6.002 3. Staffing plan 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator <p>115.13 (a) The agency shall ensure that each facility it operates shall develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect inmates against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring, facilities shall take into consideration: (1) Generally accepted detention and correctional practices; (2) Any judicial findings of inadequacy; (3) Any findings of inadequacy from Federal investigative agencies; (4) Any findings of inadequacy from internal or external oversight bodies; (5) All components of the facility’s physical plant (including “blind-spots” or areas where staff or inmates may be isolated); (6) The composition of the inmate population; (7) The number and placement of supervisory staff; (8) Institution programs occurring on a particular shift; (9) Any applicable State or local laws, regulations, or standards; (10) The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and (11) Any other relevant factors.</p> <p>Agency produced a staffing plan and the tour of the facility confirmed that assigned staff and supervisors were actually at their assigned posts. The WCSO implements a mandatory overtime order whenever a position is in jeopardy of being vacant. All positions are filled either on regular time or overtime on every shift. The facility also supplements staffing with the use of continually monitored video technology. Auditor viewed the staffing plan for the facility, broken down by teams. Staffing plans must take into account a variety of factors such as physical layout, inmate composition, activities within a particular facility, security threat group activity, past history of serious incidents and racial dynamics. The agency has implemented staffing which adequately addresses these factors by the use of staff and technology. Auditor also viewed the staffing rosters for multiple days and found that all position were filled using officers on straight or overtime as indicated by the PAQ and interviews with PREA Coordinator and Division Commander.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.13 (b) In circumstances where the staffing plan is not complied with, the facility documents and justifies all deviations from the plan.</p> <p>As addressed in element 115.13 (a), agency has a policy of mandatory overtime and fixed posts. They do not deviate from the set staffing plan. As stated above, agency fills all open positions either on straight time or overtime which was confirmed by auditor viewing the staffing rosters and interviews with staff.</p>

FINDING: AGENCY MEETS THIS ELEMENT

115.13 (c) Whenever necessary, but no less frequently than once each year, for each facility the agency operates, in consultation with the PREA coordinator required by § 115.11, 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) 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.

Agency completes a yearly policy review where staffing levels are assessed based on the needs of the facility and current or enhanced procedures. While staffing levels are assessed continually, it is during these reviews that Agency also looks at video monitoring and other monitoring technologies to ensure adherence to the staffing plans. Agency was fully staffed on each shift as observed by Auditor and makes very good use of video monitoring to supplement staffing.

FINDING: AGENCY MEETS THIS ELEMENT

115.13 (d) Each agency operating a 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 agency 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.

Agency policy 10.6.002, page 5, section B 4 a, directs that unannounced rounds by supervisors be conducted and documented on all shifts. It further directs that such rounds must not be communicated between staff. Auditor confirmed this practice through interviews with staff and inmates. Inmates interviewed stated supervisory rounds were conducted as many as five or six times each shift. Auditor was provided documentation of unannounced rounds from August 26-29, 2017. Random dates, times and shifts were taken from this documentation and provided to the PREA Coordinator so that video confirmation could be made. Each documented round was also confirmed through video evidence.

FINDING: AGENCY EXCEEDS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.14	Youthful inmates
Auditor Overall Determination: Meets Standard	
Auditor Discussion	
<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.2.003 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator <p>115.14 (a) A youthful inmate shall not be placed in a housing unit in which the youthful inmate will have sight, sound, or physical contact with any adult inmate through use of a shared dayroom or other common space, shower area, or sleeping quarters.</p> <p>Agency Classification policy 10.2.003, section D 2 d iv, page 4, directs that juvenile inmates will be separated by sight and sound from adults. While WCSO had no juveniles in custody during the onsite audit and had not housed a juvenile in the previous 12 month period, Agency is prepared to house juveniles in compliance with this element at any given time. Agency has a specialty housing unit which is completely separate from any other housing unit or exercise yard in which they would house juvenile offenders. This area was being used to house one inmate at the time of the onsite audit but that inmate would have been moved had the need arisen.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.14 (b) In areas outside of housing units, agencies shall either: (1) maintain sight and sound separation between youthful inmates and adult inmates, or (2) provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact.</p> <p>There were no youthful inmates in custody at the time of the onsite audit and there had not been a youthful inmate in the previous 12 month period. However, based on policy 10.2.003 and interview with the PREA Coordinator, Agency would maintain sight and sound separation outside of the housing unit. Inmates are not allowed unescorted movement throughout the facility. Based on this practice, youthful inmates would also be escorted at all times when out of the housing unit.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.14 (c) Agencies shall make its best efforts to avoid placing youthful inmates in isolation to comply with this provision. Absent exigent circumstances, agencies shall not deny youthful inmates daily large-muscle exercise and any legally required special education services to comply with this provision. Youthful inmates shall also have access to other programs and work opportunities to the extent possible.</p> <p>There were no youthful inmates in custody at the time of the onsite audit and there had not been a youthful inmate in the previous 12 month period. All youthful inmates would be housed in the same Specialty Housing area, which provides its own day area as well as exercise yard.</p>	

All legally required education services would be brought into the facility as necessary. Based on interviews with the PREA Coordinator, programming would also be made available as required.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO PREA policy 10.6.002 3. WCSO Searches in the Detention Facility policy 10.19.001 4. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Staff c. Inmates <p>115.15 (a) 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.</p> <p>Agency policy 10.6.002, section D 1 a-c, pages 6-7, clearly directs that cross-gender strip searches or cross-gender visual body cavity searches are not to be performed except in exigent circumstances and also directs that documentation be made if and when any such searches of this kind are done. Auditor confirmed through interviews with PREA Coordinator as well as with inmates, that this policy is adhered to. There was no documentation to review on this element as there have been no such exigent circumstances warranting cross-gender searches of any kind in the past 12 months. During staff interviews, none of the staff interviewed could recall a time when a cross-gender search was needed. Staff stated there are always staff on of the appropriate gender to conduct the search if necessary.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.15 (b) As of August 20, 2015, or August 20, 2017 for a facility whose rated capacity does not exceed 50 inmates, the facility shall not permit cross-gender pat-down searches of female inmates, absent exigent circumstances. Facilities shall not restrict female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision.</p> <p>The rated capacity of the WCSO Detention Center, far exceeds 50 inmates. Agency policy 10.6.002, section D 1 a-c, pages 6-7, clearly directs that cross-gender strip searches or cross-gender visual body cavity searches are not to be performed except in exigent circumstances and also directs that documentation be made if and when any such searches of this kind are done. Auditor confirmed through interviews with PREA Coordinator as well as with inmates, that this policy is adhered to. There was no documentation to review on this element as there have been no such exigent circumstances warranting cross-gender searches of any kind in the past 12 months. During staff interviews, none of the staff interviewed could recall a time when a cross-gender search was needed. Staff stated there are always staff on of the appropriate gender to conduct the search if necessary. Section D 1 b, pages 6-7 directs that female inmates access to programs cannot be restricted to comply with this element. Interviews with staff and inmates confirm that female inmates access to programs is not</p>

restricted as there are always female staff on duty to perform such searches.

FINDING: AGENCY EXCEEDS THIS ELEMENT

115.15 (c) The facility shall document all cross-gender strip searches and cross-gender visual body cavity searches, and shall document all cross-gender pat-down searches of female inmates.

Agency policy 10.6.002, section D 1 c, directs that all cross-gender unclothed searches, cross-gender visual body cavity searches and cross-gender pat down searches performed due to exigency, be documented. No searches of these types were performed in the past 12 months and there were no reports for Auditor to review.

FINDING: AGENCY MEETS THIS ELEMENT

115.15 (d) The facility shall implement policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without non-medical 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 an inmate housing unit.

Agency policy 10.6.002, section D 2 a, specifically allows for inmates to perform the activities and functions listed in this element without nonmedical staff or the opposite gender viewing. During the onsite tour, it was evident that inmates have the ability to shower without being viewed. In areas of the facility where the bathroom area was in a common area, inmates were able to toilet without being viewed. However, in units with individual cells, the ability to toilet or undress without viewing was problematic. Agency has installed, utilizes and monitors video equipment within each individual cell. The WCSO has installed close to one half million dollars worth of camera monitoring equipment over the past 14 years. Agency has taken the time to block out, within the camera programming, all areas within each cell where inmates toilet. Therefore, cross-gender viewing of an inmate using the toilet from the control tower has been alleviated. However, cross-gender viewing of inmates undressing in their cells was still problematic. Auditor viewed every camera, in every cell, in every unit from every tower. Auditor was able to view inmates of all genders in various states of undress, as were officers working the towers, regardless of gender. While an auditor must refrain from recommending an agency install large numbers of cameras which may be a financial burden on the agency, an auditor must also refrain from recommending cameras that have already been installed in every cell, be removed.

Auditor, PREA Coordinator and Division Lieutenant discussed various options to alleviate this issue. The ultimate outcome of these discussions was that only officers of the same gender as the units being viewed from the towers would be assigned to the tower positions. In the likely event one of the tower officers is relieved for a short time by an officer of the opposite gender as the inmates they would be tasked with monitoring through the cameras, the relieving officer would make an intercom announcement of an officer of the opposite gender in the tower. This announcement would then be logged as are all cross gender announcements. Inmates, for that short time period, would still be able to toilet and shower, they would simply not be able to undress within their cells for a short time. Agency made the change in procedure immediately.

The updated policy will be forwarded on to Auditor.

On 09-08-2017, PREA Coordinator sent auditor the tower logs to show proof of compliance with the new policy in place. Policy revision will be sent during the corrective action period.

FINDING: AGENCY DOES NOT MEET THIS ELEMENT

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On October 23, 2017, Auditor was provided supplemental documentation to evidence and demonstrate corrective action taken by WCSO administration regarding this standard. Agency provided the updated PREA Policy for the agency which meets this element. This documentation is discussed below.

ADDITIONAL DOCUMENTATION REVIEWED:

1. Agency provided an updated PREA policy which specifically addresses crossgender monitoring of inmates from the housing unit towers.
2. Agency provided tower logs documenting crossgender announcements.

REVISED CONCLUSION: AGENCY MEETS THIS ELEMENT

115.15 (e) The facility shall not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, it may be determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner.

Agency policy 10.6.002, section D 3 a-c, directs that Transgender/Intersex inmates must not be searched or physically examined for the sole purpose of determining the individual's genital status. Auditor confirmed through interviews with PREA Coordinator and other staff that this policy is known and followed. There was one Transgender female housed in the facility at the time of the onsite audit, who confirmed that she felt she had not been searched or examined in violation of this element of the standard.

FINDING: AGENCY MEETS THIS ELEMENT

115.15 (f) The agency shall train security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

Agency policy 10.6.002 Section D 3 c, directs that searches of Transgender/Intersex inmates shall be conducted in a professional and respectful manner and in the least intrusive manner possible, consistent with security needs. Interviews with PREA Coordinator confirmed that staffing to date has always allowed for gender appropriate searches. No cross-gender searches are conducted or have been conducted. Interview with the only Transgender inmate in custody during the onsite audit confirmed that all searches have been conducted by the appropriate gender as requested by the inmates and done in a professional, respectful and least intrusive manner. There was no documentation of crossgender searches for Auditor to

review as there has never been one.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: Agency must provide updated policy on cross-gender viewing and announcement from officers assigned to any of the tower positions.

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. PREA posters 4. PREA video 4. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Inmates <p>115.16 (a) The agency shall take appropriate steps to ensure that inmates with disabilities (including, for example, inmates 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. Such steps shall include, when necessary to ensure effective communication with inmates who are deaf or hard of hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In addition, the agency shall ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities, including inmates who have intellectual disabilities, limited reading skills, or who are blind or have low vision. An agency is not required to take actions that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title II of the Americans With Disabilities Act, 28 CFR 35.164.</p> <p>Agency policy 10.6.002, section F, subsection 5, page 9 directing appropriate provision are to be made as necessary for inmates not fluent in English or Spanish, persons with disabilities and those with low literacy levels. Interview with the PREA Coordinator confirmed that Agency has in place, paid interpreter services for the inmate population. Auditor confirmed that this is in place by having access to the services during the onsite audit. There was only one limited English speaking inmate in custody at the time of the onsite audit but that inmate refused to be interviewed.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.16 (b) 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 inmates 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.</p> <p>Agency policy 10.6.002, section F, subsection 5, page 9 directing appropriate provision are to be made as necessary for inmates not fluent in English or Spanish, persons with disabilities</p>

and those with low literacy levels. Interview with the PREA Coordinator confirmed that Agency has in place, paid interpreter services for the inmate population. Auditor confirmed that this is in place by having access to the services during the onsite audit. There was only one limited English speaking inmate in custody at the time of the onsite audit but that inmate refused to be interviewed.

FINDING: AGENCY MEETS THIS ELEMENT

115.16 (c) The agency shall not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under § 115.64, or the investigation of the inmate's allegations.

The WCSO does not have a policy prohibiting the use of inmate interpreters, inmate readers or other types of inmate assistants, interviews with both staff and inmates confirms that this is never done. There was only one limited English speaking inmate in custody at the time of the onsite audit and that inmate refused to be interviewed.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. HR Personnel 4. Review of HR documentation <p>115.17 (a) The agency shall not hire or promote anyone who may have contact with inmates, and shall not enlist the services of any contractor who may have contact with inmates, who— (1) 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); (2) 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; or (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.</p> <p>Agency policy 10.6.002, section C, subsection 1 a-c, page 5, specifically addresses all sections of Standard 115.17(a). Interviews with PREA Coordinator as well as HR staff confirmed that this policy is in place and adhered to. Agency provided the application for employment for the Williamson County Sheriff's Office which includes a PREA section on page 7 where questions specifically addressing the subsections of Standard 115.17 (a) are asked. Review of applications for employment as well as applications for contractors and volunteers were reviewed for the previous 12 month period. All applications were found to contain PREA specific questions in compliance with this standard.</p> <p>FINDING: AGENCY MEETS THIS STANDARD</p> <p>115.17 (b) 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 inmates.</p> <p>Agency policy 10.6.002, section C, subsection 1 a-c, page 5, specifically addresses all sections of Standard 115.17(a). Interviews with PREA Coordinator as well as HR staff confirmed that this policy is in place and adhered to. Agency provided the application for employment for the Williamson County Sheriff's Office which includes a PREA section on page 7 where questions specifically addressing the subsections of Standard 115.17 (a) are asked. During the onsite audit, an applicant for Deputy Sheriff was found to be in violation of the agencies PREA policy and PREA Standard 115.17 (a) and was denied employment. Agency provided auditor a copy of another denial of employment letter from May 25, 2017 for violation of Agencies PREA policy and PREA standards.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p>

115.17 (c) Before hiring new employees who may have contact with inmates, the agency shall: (1) Perform a criminal background records check; and (2) 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.

Agency policy 10.6.002, section C, subsection 3 a-b requires that criminal background checks be completed on all new hires who will have contact with inmates and also requires that Agency contact prior institutional employers to inquire about any PREA related, sustained allegations or investigations. I confirmed that this policy is known and in place through interviews with the PREA Coordinator as well as the HR staff. I was also given access to new hire paperwork which all contained this information, showing proof of practice.

FINDING: AGENCY MEETS THIS ELEMENT

115.17 (d) The agency shall also perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates.

Agency policy 10.6.002, section C, subsection 4, page 6 requires criminal background checks be done before enlisting the services of any contractor who may have contact with inmates. Auditor confirmed this policy is known and in place through interviews with the PREA Coordinator as well as HR staff. Auditor was given full access to HR files and all contractor paperwork contained a criminal background check, indicating proof of practice.

FINDING: AGENCY MEETS THIS ELEMENT

115.17 (e) The agency shall either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees.

Agency policy 10.6.002, section C, subsection 5, page 6, requires that criminal background checks be done on all current employees and contractors at least every five years. Interviews with the PREA Coordinator and HR staff confirm that this policy is known and in place, however, Agency has not had PREA policies in place for five years at this point, so no background checks have been conducted in this case. Auditor discussed with Agency different ways to complete this task to include conducting them in mass every five years or tracking each employees five year anniversary and conducting the background check at that time. Agency leadership was strongly considering completing the background checks during employees yearly performance evaluation. Auditor believes that Agency is in substantial compliance with this element.

FINDING: AGENCY MEETS THIS ELEMENT

115.17 (f) The agency shall ask all applicants and employees who may have contact with inmates 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.

Agency policy 10.2.006, section C, subsection 6 - 7, page 6, requires previous PREA related misconduct be questioned as part of any written applications or interviews for hiring or promotion. Auditor confirmed this policy is in place and known through interviews with the PREA Coordinator and HR staff. Auditor was provided a blank employment packet as well given access to all HR files. All new hire packets contain PREA questionnaires. Subsection 7 of this policy imposes a continual duty to disclose any PREA related misconduct and also states that any such conduct or provision of materially false information shall be grounds for termination. While conducting the onsite audit, Auditor was witness to an applicant being rejected for employment based on the omission of PREA related conduct at a previous employer.

FINDING: AGENCY MEETS THIS ELEMENT

115.17 (g) Material omissions regarding such misconduct, or the provision of materially false information, are grounds for termination.

Agency policy 10.6.002, section C, Subsection 7, page 6 of this policy imposes a continual duty to disclose any PREA related misconduct and also states that any such conduct or provision of materially false information shall be grounds for termination. While conducting the onsite audit, Auditor was witness to an applicant being rejected for employment based on the omission of PREA related conduct at a previous employer. Interviews with PREA Coordinator and HR staff confirm that the policy is in place and known and review of HR documents as well as Auditor witnessing the rejection of an applicant based on this policy provides proof of practice.

FINDING: AGENCY MEETS THIS ELEMENT

115.17 (h) 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.

Agency policy 10.6.002, section C, subsection 8, page 6 mirrors PREA Standard 115.17 (h). Upon interviewing HR staff, Auditor noted that despite having policy directing the release of such information, agency Human Resource personnel was operating under the assumption that providing this information to an institutional employer or any employer for that matter, was unlawful and therefore had not been providing it unless the employee had signed a "Release Of Information" form . Auditor requested HR staff confirm with their legal office, the legality of providing this information in Tennessee. Their legal office confirmed that providing this information to an "Institutional employer" was mandatory by PREA standards and is lawful in the state of Tennessee. Agency has never had a substantiated Sexual Assault/Harassment case against one of its employees. They have in the past received requests but have not had substantiated information to provide. Interview with PREA Coordinator confirmed that if substantiated information was available, it would be provided upon request. There was no documentation of compliance with this element available to review at the time of the onsite audit and therefore, Agency meets this element.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.18	Upgrades to facilities and technologies
	<p data-bbox="252 170 927 203">Auditor Overall Determination: Exceeds Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 970 360">Evidence reviewed (documents, interviews, site review)</p> <ol data-bbox="252 371 932 573" style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Division Lieutenant c. Division Commander <p data-bbox="252 629 1426 786">115.18 (a) 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 inmates from sexual abuse.</p> <p data-bbox="252 842 1477 999">Agency has not acquired, designed or built a new facility since August 20, 2012. However, agency is considering designing and building a new detention center within the next 5-7 years. Agency was reminded of Standard 115.18 and its place in the process. Agency stated they would take PREA into consideration in all phases of this process.</p> <p data-bbox="252 1055 437 1088">FINDING: N/A</p> <p data-bbox="252 1144 1458 1256">115.18 (b) 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 inmates from sexual abuse.</p> <p data-bbox="252 1312 1469 1906">Agency has installed and updated video monitoring systems, electronic surveillance systems since August 20, 2012. Agency considered how the new and additional technology would enhance their ability to protect inmates. This was stated during interviews with agency staff and was evident to Auditor based on numbers and placement of cameras. Agency has gone above and beyond in their utilization of video monitoring technology, placing cameras of various types in all areas of the Detention Center including individual cells. Auditor was provided access to all video monitoring areas and was able to verify that the use of this technology certainly enhances inmate safety. Agency utilizes one inmate to clean outside the confines of the secure portion of the facility, in the administration and patrol side of the Sheriff's Office. This is the one area where an inmate is allowed that no camera was installed. Auditor recommended the placement of a camera in this area as the agency is currently considering adding more cameras to other parts of the facility or to not utilize inmate labor to clean in that particular area. The Sheriff was made aware of this recommendation and directed the camera be installed immediately.</p> <p data-bbox="252 1962 868 1995">FINDING: AGENCY EXCEEDS THIS ELEMENT</p> <p data-bbox="252 2051 660 2085">CORRECTIVE ACTION: NONE</p>

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. WCSO PREA written response plan 4. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Programs Coordinator c. SANE/SAFE providers d. Detention staff e. Investigative staff <p>115.21 (a) 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.</p> <p>The WCSO is responsible for allegations of sexual abuse wherever it occurs. Agency policy 10.6.002, section A, subsection 4, page 4 states that Agency maintains a written plan to coordinate the response to an incident of sexual abuse. This plan includes following a uniform evidence protocol which is outlined in Agency policy 7.7.001 (Collection and Preservation of Evidence). Interviews with all applicable staff confirmed that this policy is known and in place. Detention staff were well aware of the evidence preservation and collection procedures during the numerous onsite interviews conducted. The PREA Coordinator has also had printed and laminated, a PREA response card which has been distributed to all staff. This card specifically addresses that need to protect and preserve the crime scene and any related evidence.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.21 (b) The protocol shall be developmentally appropriate for youth where applicable, 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.</p> <p>Agency policy 10.6.002, Appendix A, is the agencies PREA Written Response Plan. The evidence protocol used is based on the U.S. Department of Justice, Office on Violence Against Women, April 2013, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents, Second Edition.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.21 (c) The agency shall offer all victims of 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</p>

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.

Agency PREA Written Response Plan, section A, subsection 2 a - b, specifically states forensic medical exams shall be offered without cost and will be conducted by SANE/SAFE personnel or other qualified medical practitioner. Agency also documents its efforts to provide SAFE and SANE. All exams of this nature are conducted by qualified staff at the Williamson Medical Center. Interviews with staff confirmed that this policy is in place and known, however, no incidents requiring the use of the response plan have occurred at the facility. There were no cases available for Auditor to review at the time of the onsite visit. Auditor confirmed through phone interviews that SANE/SAFE services for the WCSO are not available at the Williamson Medical Center, however, PREA related exams are conducted by Emergency Room physicians who have had training in Sexual Assault related exams and evidence collection.

FINDING: AGENCY MEETS THIS ELEMENT

115.21 (d) 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 makes 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. The agency may utilize a rape crisis center that is part of a governmental unit as long as the center is not part of the criminal justice system (such as a law enforcement agency) and offers a comparable level of confidentiality as a nongovernmental entity that provides similar victim services.

Agency makes a community based rape crisis center available to inmates and has a qualified agency staff member who is available who would respond until relieved by a rape crisis advocate. Auditor met and interviewed the staff advocate during the onsite audit. Auditor observed signage in every housing unit that gave the phone number for a rape crisis center. Auditor tested the number using an inmate phone in every housing unit and found that the phone number did not go to a live person, but required the inmate to leave a message, which is not appropriate as the inmate may need to speak to someone immediately and cannot received in coming phone calls. This information was immediately passed on to the PREA Coordinator. On 7-12-17, Auditor was provided an MOU between the Williamson County Sheriff's Office and the Sexual Assault Center located in Nashville, TN. Auditor was also provided a screen shot of the inmate phone system settings screen where the phone number is marked as a free call and not to be monitored.

FINDING: AGENCY MEETS THIS ELEMENT

115.21 (e) 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.

Agency has a qualified staff member who would accompany and support victims from the WCSO if necessary. Specialized training in support services is available through the contracted rape crisis organization as well. Agency qualified staff member has been trained through the Office of Criminal Justice Programs. In 2016, staff member attended training on "Responding to Sexual Assault Disclosure", "Recognizing signs and symptoms of Sexual Abuse" and "Crisis and Support Services for Sexual Assault Victims". Agency has had no incidents where the qualified staff member has been needed. Auditor had no cases to review during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

115.21 (f) 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.

Agency is responsible for investigating all allegations of sexual abuse.

FINDING: AGENCY MEETS THIS ELEMENT

115.21 (g) The requirements of paragraphs (a) through (f) of this section shall also apply to: (1) Any State entity outside of the agency that is responsible for investigating allegations of sexual abuse in prisons or jails; and (2) Any Department of Justice component that is responsible for investigating allegations of sexual abuse in prisons or jails.

Agency is responsible for investigating all allegations of sexual abuse.

FINDING: AGENCY MEETS THIS ELEMENT

115.21 (h) For the purposes of this section, 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.

CORRECTIVE ACTION: NONE

115.22	Policies to ensure referrals of allegations for investigations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Investigative personnel <p>115.22 (a) The agency shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.</p> <p>Agency policy 10.6.002, section A, subsection 1, page 4 states the Agencies zero tolerance policy and directs that Agency must fully investigate allegations of sexual abuse and sexual harassment, pursue disciplinary action and refer for investigation and prosecution, those who perpetrate such actions. Agency has had 17 allegations of sexual harassment in the previous 12 month period, all of which were investigated. None of the 17 cases were referred for prosecution. Auditor was able to view all 17 investigations conducted and found them to have occurred.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.22 (b) The agency shall have in place a policy 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. The agency publishes such policy on its website or, if it does not have one, makes the policy available through other means. The agency documents all such referrals.</p> <p>Agency policy 10.6.002, section A, subsection 1, page 4 states agency will refer for criminal investigation, allegations which are determined to be criminal in nature. Section E, subsection 5 a -b, states that investigations will be conducted by the Criminal Investigations Division of the Agency. This section goes on to outline the training received by Agency criminal investigators. Auditor was provided documentation of specialized training received by investigators. Agency also publishes this policy on its website and was confirmed by auditor.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.22 (c) If a separate entity is responsible for conducting criminal investigations, such publication shall describe the responsibilities of both the agency and the investigating entity.</p> <p>Agency conducts its own criminal investigations.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.22 (d) Any State entity responsible for conducting administrative or criminal investigations</p>

of sexual abuse or sexual harassment in prisons or jails shall have in place a policy governing the conduct of such investigations.

Agency conducts its own criminal investigations.

FINDING: AGENCY MEETS THIS ELEMENT

115.22 (e) Any Department of Justice component responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in prisons or jails shall have in place a policy governing the conduct of such investigations.

Agency conducts its own criminal investigations.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.31	Employee training
Auditor Overall Determination: Meets Standard	
Auditor Discussion	
<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator 4. Training curriculum <p>115.31 (a) The agency shall train all employees who may have contact with inmates on: (1) Its zero-tolerance policy for sexual abuse and sexual harassment; (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; (3) Inmates' rights to be free from sexual abuse and sexual harassment; (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; (5) The dynamics of sexual abuse and sexual harassment in confinement; (6) The common reactions of sexual abuse and sexual harassment victims; (7) How to detect and respond to signs of threatened and actual sexual abuse; (8) How to avoid inappropriate relationships with inmates; (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.</p> <p>Agency policy 10.6.002, section E, subsections 1- 5, pages 7-8 outlines employee, volunteer and contractor training on policies for the prevention, detection, response, reporting and investigation of inmate sexual assault. These sections also direct that training be acknowledged and understood by way of electronic signature. Agency provided Auditor all training curriculum which includes all aspects of training listed in Standard 115.31 (a). Auditor was also provided documentation of signatures of those who have attended training.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.31 (b) Such training shall be tailored to the gender of the inmates at the employee's facility. The employee shall receive additional training if the employee is reassigned from a facility that houses only female inmates, or vice versa.</p> <p>Training provided is tailored to all gender types as Agency houses inmates of all genders. Agency does not employ anyone from other agencies. All WCSO employees receive the same training upon employment. Auditor confirmed through curriculum, that training is tailored to all genders.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.31 (c) 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</p>	

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.

Agency policy 10.6.002, section E, subsection 2, page 8 directs that all WCSO employees shall receive refresher training related to PREA policies every two years and that on off years, shall provide written information related to PREA policies. Agency has trained 299 employees, contractors and volunteers on PREA policies at the Agency. On 9-12-16 Agency provided refresher information in the form of a detailed brochure on PREA and PREA related issues.

FINDING: AGENCY MEETS THIS ELEMENT

115.31 (d) The agency shall document, through employee signature or electronic verification, that employees understand the training they have received.

Agency policy 10.6.002, section E, subsection 3, page 8, directs that Agency obtain signatures of all who have received training indicating their attendance and understanding. Agency provided such documentation to Auditor.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Contractors/Volunteers 3. Documentation review <p>115.32 (a) The agency shall ensure that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures.</p> <p>Agency has trained 266 contractors or volunteers in their PREA responsibilities. Agency provided the contractor/volunteer background form as well as the agreement form. Both documents have a section specifically for PREA information. Interviews with contractors and volunteers confirmed that they had received PREA training.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.32 (b) 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 inmates, but all volunteers and contractors who have contact with inmates shall be notified of the agency’s zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.</p> <p>Agency provides training to contractors and volunteers based on their level of contact with inmates. Contractors or volunteers with minimal contact with inmates receive less training than contractors such as the Agency medical provider. Medical providers receive training from the Agency, but Auditor confirmed that they are also receiving PREA training from their employer as well. Medical contractor provided documentation of training. Interviews with contractors and volunteers confirmed that they had been trained based on their level of contact with inmates.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.32 (c) The agency shall maintain documentation confirming that volunteers and contractors understand the training they have received.</p> <p>Agency does maintain documentation of contractor training and signatures indicating training was received and understood. Auditor was provided access to these records and confirmed that Agency is providing training.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>CORRECTIVE ACTION: NONE</p>



115.33	Inmate education
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator 4. Document review <p>115.33 (a) During the intake process, inmates 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.</p> <p>Agency policy 10.6.002, section F, subsection 1, page 8 directs that all inmates, upon intake, shall receive information explaining the zero tolerance policy regarding sexual abuse and sexual harassment and how to report such incidents. Agency has documentation of the use of the Sexual Victimization Predictor Scale as well as documentation of PREA education provided to all inmates upon intake. Auditor was given access to all files of inmates currently in custody. Auditor reviewed 22 total files chosen randomly from each letter of the alphabet as the Agency filing system is set up alphabetically. Auditor found that every file reviewed had a signed document by the inmate indicating they had received PREA training upon intake or within 24 hours of intake.</p> <p>FINDING: AGENCY EXCEEDS THIS ELEMENT</p> <p>115.33 (b) Within 30 days of intake, the agency shall provide comprehensive education to inmates 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.</p> <p>Agency provides twice daily PREA training in all housing units in both English and Spanish. This training is done through video streamed to all housing units. During the onsite facility tour as well as random entrance into housing units throughout the onsite audit, Auditor was able to verify that the training is being conducted. During inmate interviews, the common theme for virtually all inmates is that the PREA video plays twice daily. Statements were made on multiple occasions by inmates during interviews, that they can now recite the PREA policy in both English and Spanish.</p> <p>FINDING: AGENCY EXCEEDS THIS ELEMENT</p> <p>115.33 (c) Current inmates 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 inmate's new facility differ from those of the previous facility.</p>

inmates being housed at the WCSO are provided training upon intake and twice daily while housed in the facility. This was confirmed visually by Auditor as well as through inmate interviews and intake documentation review. Inmates are not transferred to other facilities, they are either released from custody or sentenced to prison.

FINDING: AGENCY EXCEEDS THIS ELEMENT

115.33 (d) The agency shall provide inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, otherwise disabled, as well as to inmates who have limited reading skills.

Agency policy 10.6.002, section F, subsection 5, page 9, directs that appropriate provisions be made as necessary for inmates not fluent in English or Spanish or persons with disabilities and those with low literacy levels. Agency utilizes a language bank for non English speaking inmates as well as those who are deaf. For inmates who are otherwise disabled or who have limited reading skills, the PREA policy and how to report are read to them by staff.

FINDING: AGENCY MEETS THIS ELEMENT

115.33 (e) The agency shall maintain documentation of inmate participation in these education sessions.

Agency maintains documentation of both intake training and housing unit training. Intake training is documented in each inmate file and was confirmed by auditor. Housing unit training is done twice daily and is documented on the tower activity logs which was confirmed by Auditor.

FINDING: AGENCY EXCEEDS THIS ELEMENT

115.33 (f) In addition to providing such education, the agency shall ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats.

Agency has PREA posters in all inmate areas, on each housing unit kiosk as well as video information played twice daily in all housing units in both English and Spanish. This was all confirmed by Auditor during the onsite tour and through interviews with inmates and staff.

FINDING: AGENCY EXCEEDS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator 3. Documentation review <p>115.34 (a) In addition to the general training provided to all employees pursuant to § 115.31, 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.</p> <p>Agency has had six investigators receive training in conducting investigations in confinement settings. Interviews with investigative staff confirms that training was received. Agency also provided certificates of training from the NIC on conducting investigations in confinement settings.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.34 (b) Specialized training shall include techniques for interviewing 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.</p> <p>Training provided for investigative staff was through the National Institute of Corrections and includes all elements of 115.34 (b). Agency policy 10.6.002, section E, subsection 5 a, page 8 also outlines training required by investigators. This policy also includes all elements of 115.34 (b). Auditor confirmed that training was provided through interviews and review of certificates of training.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.34 (c) The agency shall maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.</p> <p>Agency policy 10.6.002, section E, subsection 5 b, page 8, directs that documentation of specialized training be maintained. Auditor confirmed that this is in place by review of certificates of training provide to Auditor.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.34 (d) Any State entity or Department of Justice component that investigates sexual abuse in confinement settings shall provide such training to its agents and investigators who conduct such investigations.</p>

Agency investigates all allegations of sexual abuse or sexual harassment.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator <p>115.35 (a) The agency ensures 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 victims of sexual abuse and sexual harassment; and (4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.</p> <p>Agency policy 10.6.002, section E, subsections 1 - 4, pages 7 - 8, directs that all employees, contractors and volunteers be trained on Agency policies for prevention, detection, response, reporting and investigation of inmate sexual assault. Agency has trained 100 percent of its medical staff on these policies and has documentation of such training. The contracted medical provider also trains its own employees on PREA and proof of this training was provided to Auditor during the onsite audit.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.35 (b) If medical staff employed by the agency conduct forensic examinations, such medical staff shall receive the appropriate training to conduct such examinations.</p> <p>Agency medical contractor does not conduct forensic examinations. This element is N/A</p> <p>FINDING: N/A</p> <p>115.35 (c) 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.</p> <p>Agency as well as the contracted medical provider, maintain documentation of training which was provided and reviewed by auditor.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.35 (d) Medical and mental health care practitioners shall also receive the training mandated for employees under § 115.31 or for contractors and volunteers under § 115.32, depending upon the practitioner's status at the agency.</p> <p>Agency does provide mandated training for employees under standard 115.31 based on their</p>

level of contact with inmates. Agency maintains documentation of such training. Auditor confirmed this training is completed through document review and staff interviews.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.41	Screening for risk of victimization and abusiveness
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator 4. Document review <p>115.41 (a) All inmates shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates.</p> <p>Agency policy 10.6.002, section G, subsection 1, page 9, directs that all inmates be screened using the Sexual Victimization Predictor Scale and the Sexual Predator Predictor Scale, both administered by booking personnel. Agency provided copies of both scales. Auditor was given full access to all inmate booking files and 22 files were chosen at random from Agencies alphabetical filing system. All 22 files contained both screening tools.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.41 (b) Intake screening shall ordinarily take place within 72 hours of arrival at the facility.</p> <p>Agency policy 10.6.002, section G, subsection 1, page 9, directs that all inmates be screened using the Sexual Victimization Predictor Scale and the Sexual Predator Predictor Scale, both administered by booking personnel. Auditor reviewed 22 random inmate files, all of which contained both scales and all were done within 24 hours of entrance into the facility, without exception.</p> <p>FINDING: AGENCY EXCEEDS THIS ELEMENT</p> <p>115.41 (c) Such assessments shall be conducted using an objective screening instrument.</p> <p>Agency uses the Sexual Predator Predictor and Sexual Victimization Predictor Scales. Both forms are completed on all inmate during the intake process. Both forms are point based and are scored using information obtained during the inmates interview by booking personnel and information currently on file with the agency or other data bases. The Sexual Predator Predictor Scale is also completed after any incident involving sexual abuse against others and institutional violence against others. Both forms were developed in house using PREA standards, however the creator of the form is unknown. The screening instrument used includes all criteria outlined in Standard 115.41 (d) as well as 115.41 (e).</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.41 (d) The intake screening shall consider, at a minimum, the following criteria to assess</p>

inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability; (2) The age of the inmate; (3) The physical build of the inmate; (4) Whether the inmate has previously been incarcerated; (5) Whether the inmate's criminal history is exclusively nonviolent; (6) Whether the inmate has prior convictions for sex offenses against an adult or child; (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; (8) Whether the inmate has previously experienced sexual victimization; (9) The inmate's own perception of vulnerability; and (10) Whether the inmate is detained solely for civil immigration purposes.

Agencies Sexual Victimization Predictor Scale completed on all incoming inmates, includes all ten areas described in Standard 115.41 (d). Agency provided Auditor a copy of this scale and auditor confirmed through file review that all inmates have been screened during the intake process, within 24 hours in every case.

FINDING: AGENCY MEETS THIS ELEMENT

115.41 (e) The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing inmates for risk of being sexually abusive.

Agencies Sexual Predator Predictor Scale completed on all incoming inmates, includes all three areas described in Standard 115.41 (e). Agency provided Auditor a copy of this scale and auditor confirmed through file review that all inmates have been screened during the intake process, within 24 hours in every case.

FINDING: AGENCY MEETS THIS ELEMENT

115.41 (f) Within a set time period, not to exceed 30 days from the inmate's arrival at the facility, the facility will reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening.

Agency policy 10.6.002, section G, subsection 2, page 9, directs that all inmates are to be reassessed for risk of victimization or abusiveness based on any additional, relevant information received by the facility since the intake screening. The PREA Coordinator is responsible for reassessment of inmates. Auditor was given full access to the inmate files both on paper and in electronic form. All inmates had been reassessed when necessary.

FINDING: AGENCY MEETS THIS ELEMENT

115.41 (g) An inmate's risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness.

Agency policy 10.6.002, section G, subsection 3, pages 9-10, direct that reassessments be completed when warranted based on the criteria listed in Standard 115.41 (g) above. Auditor confirmed that these reassessments are being completed through interviews with the PREA Coordinator and file review. The PREA Coordinator is responsible for conducting such reassessments.

FINDING: AGENCY MEETS THIS ELEMENT

115.41 (h) Inmates may not be disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section.

Agency policy 10.6.002, section G, subsection 4, page 10, directs that inmates may not be disciplined for any of the criteria listed in Standard 115.41 (h) listed above. Auditor confirmed that this policy is known and in practice through interviews with PREA Coordinator, Intake screening staff and file reviews. Auditor was unable to locate a single time where an inmate was disciplined for any of the criteria listed above.

FINDING: AGENCY MEETS THIS ELEMENT

115.41 (i) 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 inmate's detriment by staff or other inmates.

All inmate files are kept either in one specific location in booking and not to be removed from booking or are in electronic form on a designated computer drive that is password controlled. During the onsite audit, Agency allowed Auditor to have access to a completely separate computer server devoted solely to PREA. This server was in development at the time but was coming on line during the audit and would be fully on line shortly after the audit. This PREA server is not only password protected but the server itself can only be accessed by designated personnel in an effort to keep all PREA information completely confidential.

FINDING: AGENCY EXCEEDS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.42	Use of screening information
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 970 360">Evidence reviewed (documents, interviews, site review)</p> <ol data-bbox="252 371 932 658" style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol data-bbox="252 501 552 613" style="list-style-type: none"> a. PREA Coordinator b. Transgender inmate c. Random staff 4. Document review <p data-bbox="252 714 1453 875">115.42 (a) The agency shall use information from the risk screening required by § 115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p data-bbox="252 927 1469 1173">Agency policy 10.6.002, section H, subsection 1, page 10 describes how information obtained from the risk screenings conducted on all inmates during the intake process is to be used. All criteria in Standard 115.42 (a) are listed in this policy. Auditor confirmed that Agency is in compliance with this element through interviews with the PREA Coordinator and review of electronic inmate files. All inmate assignments are made with the goal of keeping inmates at high risk of being victimized from those at high risk of being abusive.</p> <p data-bbox="252 1229 831 1263">FINDING: AGENCY MEETS THIS ELEMENT</p> <p data-bbox="252 1319 1410 1391">115.42 (b) The agency shall make individualized determinations about how to ensure the safety of each inmate.</p> <p data-bbox="252 1447 1469 1693">Agency policy 10.6.002, section H, subsection 1, page 10 describes how information obtained from the risk screenings conducted on all inmates during the intake process is to be used. This policy also directs that Agency will make individualized determinations about how to ensure the safety of each inmate. This is in practice at the WCSO as evidenced through interviews with PREA Coordinator and file review of those inmate identified as being at risk of victimization or abusiveness.</p> <p data-bbox="252 1749 831 1783">FINDING: AGENCY MEETS THIS ELEMENT</p> <p data-bbox="252 1839 1469 2000">115.42 (c) In deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems.</p> <p data-bbox="252 2047 1453 2159">Agency policy 10.6.002, section H, subsection 2, page 10 directs that Agency must consider, on a case by case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems. Auditor</p>

confirmed compliance with this element through interviews with PREA Coordinator, inmate interview and review of placement of the one and only transgender inmate in the facility at the time of the onsite audit. The inmate interviewed identified as a female but was physiologically a male. This inmate could have been at risk of being victimized in a male housing unit, but asked to be housed in the male unit. While the inmate stated staff had not asked her questions about her safety, Auditor found through file review that all inmates are questioned about their perception of victimization.

FINDING: AGENCY MEETS THIS ELEMENT

115.42 (d) Placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety experienced by the inmate.

Agency policy 10.6.002, section H, subsection 3, page 11 states that placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice a year. Interview with PREA Coordinator confirmed that this policy is in place but that they have never had a transgender or intersex inmate incarcerated for a one year period. The one and only transgender inmate in custody at the time of the onsite audit had been incarcerated less than one year.

FINDING: AGENCY MEETS THIS ELEMENT

115.42 (e) A transgender or intersex inmate's own views with respect to his or her own safety shall be given serious consideration.

Agency policy 10.6.002, section H, subsection 4, page 11, requires that Agency take a transgender or intersex inmate's own views with respect to his or her own safety , serious consideration. All inmates are screened for possible victimization during the intake process. Auditor confirmed that all inmates are screened through random file review. Agency had placed the one and only transgender inmate in custody at the time of the onsite audit in a housing unit requested by the inmate. The unit requested was the opposite gender of the gender to which the inmate most closely identified. Agencies willingness to place the inmate in the housing unit of her choice, indicates full compliance with this element.

FINDING: AGENCY MEETS THIS ELEMENT

115.42 (f) Transgender and intersex inmates shall be given the opportunity to shower separately from other inmates.

Agency policy 10.6.002, section H, subsection 5, page 1, required that transgender and intersex inmates be given the opportunity to shower separately from other inmates. All inmates in the WCSO are given this opportunity. Auditor confirmed this through interviews with PREA Coordinator, random staff and inmates. The one and only transgender inmate in custody at the time of the onsite audit was in a unit which had no separate cells, but had bunk beds throughout. The shower facility is single use in that housing unit. Auditor confirmed the location of all showers and their status as single use during the onsite tour of the facility and all housing units.

FINDING: AGENCY MEETS THIS ELEMENT

115.42 (g) The agency shall not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.

Agency policy 10.6.002, section H, subsection 6, page 11, directs mirrors Standard 115.42 (g). Agency does not have a unit specifically for LGBTI inmates and each housing assignment is made on a case by case basis. Auditor confirmed this policy is known and in place through interviews with PREA Coordinator, a transgender inmate and through file review. The one and only transgender inmate in custody at the time of the onsite audit was in a General Population housing unit, that is to say, she was in a unit where LGBTI and non LGBTI inmates were housed together.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.43	Protective Custody
Auditor Overall Determination: Meets Standard	
Auditor Discussion	
<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator 4. Document review <p>115.43 (a) Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.</p> <p>Agency policy 10.6.002, section H, subsection 7 a, page 11, mirrors standard 115.43 (a). There were no inmates being housed involuntarily in segregated housing based on the inmates high risk for sexual victimization, no have there been inmates housed for this reason within the past 12 months. There were no files to be reviewed by Auditor during the onsite audit.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.43 (b) Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document: (1) The opportunities that have been limited; (2) The duration of the limitation; and (3) The reasons for such limitations.</p> <p>Agency policy 10.6.002, section H, subsection 7 c, page 11, specifically states that inmates placed in segregated housing shall have access to programs, privileges and work opportunities to the extent possible and if such access is limited, Agency shall document the limitation, its duration and the reason for the limitation. There have been no inmates placed in segregated housing for the purpose stated in Standard 115.43 (a) in the past 12 months. Auditor had no files to review for this standard during the onsite audit.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.43 (c) The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days.</p> <p>Agency policy 10.6.002, section H, subsection 7 d, page 11, addresses this element of the standard directly. There have been no inmates placed in segregated housing for the purpose</p>	

stated in Standard 115.43 (a) in the past 12 months. Auditor had no files to review for this standard during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

115.43 (d) If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, the facility shall clearly document: (1) The basis for the facility's concern for the inmate's safety; and (2) The reason why no alternative means of separation can be arranged.

No inmates have been housed pursuant to paragraph (a). Auditor reviewed a variety of random classification documents unrelated to PREA where the basis for the Agencies actions were clearly stated as well as what actions were taken. Auditor had no inmate classification files related to paragraph (a) to review, however, document reviews show that Agency thoroughly and consistently documents its actions.

FINDING: AGENCY MEETS THIS ELEMENT

115.43 (e) Every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.

Agency policy 10.6.002, section H, subsection 7 e, page 12, directs that every 30 days, inmates shall be afforded a review to determine whether continued separation is necessary. Agency had no inmates involuntarily segregated based on this standard, however, Agency reviews all segregated inmates every 30 days. Auditor confirmed compliance with this practice through interviews with PREA Coordinator as well as electronic document review of classification files.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. WCSO facility tour 4. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Division Lieutenant <p>115.51 (a) The agency shall provide multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.</p> <p>Agency policy 10.6.002, section I, subsections 1 - 5, pages 12 -14, section J, subsections 1 - 7, page 14 and section K, subsections 1 - 3, page 15, address Agencies provision of multiple, internal ways for inmates to privately report. Agency provides such means of reporting as verbal or written reporting to staff, through the grievance process, third party reporting, calling an external entity from the inmate phone system, the PREA button on the housing unit kiosks and by messaging the PREA Coordinator directly from the housing unit kiosks. Auditor confirmed all of the listed ways of privately reporting were in place through interviews with PREA Coordinator, numerous random staff, numerous inmates, through observation of signage in the housing units, the housing unit kiosks and through direct observation of the PREA button being used in a real time report of sexual harassment.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.51 (b) The agency shall also provide at least one way for inmates 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 inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. Inmates 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.</p> <p>Agency policy 10.6.002, section I, subsection 2 c, page 12 gives inmates a specific number to call from the inmate phone system to report incidents of sexual abuse or sexual harassment. Auditor confirmed during the onsite tour of the facility that this number was prominently displayed in every housing unit. This number is to be a free and unrecorded call. Using the inmate phone system, Auditor called the listed number and found that it went to an answering machine at an entity entitled Shortel. There was no indication that the message would be acted upon, when it would be acted upon or by whom. Further investigation confirmed that this number was also being recorded. Auditor made this test call from one inmate phone in every housing unit to confirm that it was not isolated to one unit. Auditor found that the issue is throughout the facility. Agency was immediately made aware of the problem with this method</p>

of reporting.

Agency PREA Coordinator reported back to Auditor in a phone call on August 18, 2017 that this issue is being rectified and will be in place as soon as the Memorandum of Understanding (MOU) is signed by both entities. A copy of the signed MOU will be provided to Auditor along with a screen shot of the inmate phone system confirming the call is free and unrecorded, as soon as these are fully in place. A photograph of the change in signage will also be provided when completed.

Information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security is posted in every housing unit for the benefit of inmates being detained solely for civil immigration purposes. Auditor confirmed this information is posted in every housing unit during the onsite audit tour.

FINDING: AGENCY DOES NOT MEET THIS ELEMENT

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

Auditor was provided supplemental documentation on September 21, 2017 to evidence and demonstrate corrective actions taken by Agency administration regarding this standard. On October 18, 2017, Agency provided a form created for the receiving agency to complete and forward to the Williamson County Sheriff's Office to investigate.

On September 21, 2017, Agency also provided a signed MOU with the Brentwood Police Department for official reports from inmates within the Williamson County Sheriff's Office.

On November 6, 2017, Agency provided Auditor, photographs of the updated PREA information posters in each housing unit.

These documents are discussed below.

ADDITIONAL DOCUMENTATION REVIEWED:

1. Agency provided a signed MOU with Brentwood Police Department to take reports of Sexual Abuse and Sexual Harassment from inmates in the Williamson County Detention Center and will forward them to Agency for followup and investigation.
2. Agency provided a form to be completed by the Brentwood Police Department when receiving a complaint of Sexual Abuse or Sexual Harassment from an inmate within the Williamson County Sheriff's Office, which will be forwarded to Agency for investigation.
3. Agency provided photographic evidence of updated PREA posters with Brentwood Police Departments phone number. This was verified by Auditor by a phone call to the listed number.
4. Agency also provided a screen shot of the inmate phone system showing the call to Brentwood Police Department is a free and unmonitored call for inmates.

REVISED CONCLUSION: AGENCY MEETS THIS ELEMENT

115.51 (c) Staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports.

Agency policy 10.6.002, section I, subsection 1, page 12, directs staff to accept all reports of sexual abuse, sexual harassment or retaliation in whatever form they are received. This policy also directs that verbal reports will be promptly documented. Auditor confirmed that this policy is known and in practice through interviews with PREA Coordinator, facility staff and inmates

and document review of classification files where allegations have been received. Auditor also experienced first hand, a report of sexual harassment made using the PREA button on the housing unit kiosk. Auditor observed the notification, the response and the documentation of the incident.

FINDING: AGENCY MEETS THIS ELEMENT

115.51 (d) The agency shall provide a method for staff to privately report sexual abuse and sexual harassment of inmates.

Agency policy 10.6.002, section J, subsection 1, page 14, states that staff must report all PREA related complaints to the PREA Coordinator which may be done in variety of ways to include in person and email, however, staff are also given permission to go directly to the Division Lieutenant to report if they so choose. Auditor confirmed that this policy is known and in practice through interviews with the PREA Coordinator, Division Lieutenant and facility staff. There were no reports made by staff for auditor to review during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: Agency must secure, post and provide proof of the use of an outside agency who can take PREA related complaints and forward them on to Agency for investigation. This proof can be through photographs of posted numbers, screenshots of phone system indicating the use of this number and providing the name and number of the agency being used so Auditor can confirm by phone.

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Facility staff c. Inmates 4. Facility tour 5. Auditor personal experience while on site <p>115.52 (a) An agency shall be exempt from this standard if it does not have administrative procedures to address inmate grievances regarding sexual abuse.</p> <p>Agency does have administrative procedures to address inmate grievances regarding sexual abuse.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.52 (b) (1) The agency shall not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse. (2) The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse. (3) The agency shall not require an inmate 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 an inmate lawsuit on the ground that the applicable statute of limitations has expired.</p> <p>Agency policy 10.6.002, section I, subsection 5 a - g, pages 12 - 14, specifically address inmates grievances as they related to PREA and sexual abuse and sexual harassment. Agency imposes no time limit on PREA related grievances but goes on to point out that timely submissions enhance the ability to investigate allegations. Based on Agency policy listed above, inmates are not required to use any informal grievance process or to attempt to resolve an alleged incident of sexual abuse with staff. Auditor confirmed that this policy is known and in practice through interviews with PREA Coordinator, facility staff and inmates. However, there have been no grievances submitted alleging sexual abuse in the past 12 months or ever, for Auditor to review.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.52 (c) The agency shall ensure that— (1) An inmate 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.</p> <p>Agency policy 10.6.002, section I, subsection 5 c, page 13, directs all PREA related grievances</p>

to be submitted the PREA Coordinator unless the Coordinator is the subject of the grievance, in which case the grievance is submitted to the Division Lieutenant. Subsection 5 c 1, states that inmates are not required to submit a grievance to the staff member who is the subject of the grievance, nor will the grievance be forwarded to the involved staff member for follow up. Auditor confirmed that this policy is known and in practice through interviews with PREA Coordinator, facility staff, inmates and Division Lieutenant. There has never been a grievance submitted alleging sexual abuse for Auditor to review.

FINDING: AGENCY MEETS THIS ELEMENT

115.52 (d) (1) The agency issues 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 does not include time consumed by inmates 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 inmate in writing of any such extension and provide a date by which a decision will be made. (4) At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, the inmate may consider the absence of a response to be a denial at that level.

Agency policy 10.6.002, section I, subsection 5 d, page 13 places a 90 day time limit for Agency to render a final decision on the merits of any grievance. Agency has chosen not to allow itself an additional 70 day extension to answer grievances. Agency has not included the extension period due to Agency never having had a grievance which required 90 days to resolve, so according to the PREA Coordinator, an additional extension period is unnecessary. Auditor confirmed that Agency is meeting this element through interviews with PREA Coordinator, staff, inmates and through review of electronic grievances where no grievances took the original 90 days allowed by this element.

FINDING: AGENCY MEETS THIS ELEMENT

115.52 (e) (1) Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, shall be permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of inmates. (2) If a third party files such a request on behalf of an inmate, 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. (3) If the inmate declines to have the request processed on his or her behalf, the agency shall document the inmate's decision.

Agency policy 10.6.002, section I, subsection e 1 -2, page 13, allows for third party reporting. Auditor confirmed that this policy is known and in practice through interviews with PREA Auditor. Agency had no third party reports for auditor to review during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

115.52 (f) (1) The agency shall establish procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse. (2) After receiving an emergency grievance alleging an inmate 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. The initial response and final agency decision documents the agency's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

Agency policy 10.6.002, section I, subsection g 1 - 3, page 13 - 14, allow for an inmate to file an emergency grievance when an inmate is subject to a substantial risk of imminent sexual abuse. This process can take place in several ways, inmate can message the PREA Coordinator directly through the housing unit kiosk, a paper grievance can be completed and turned in to the housing unit Deputy or the inmate can press a PREA button on the housing unit kiosk. The most effective and expedient by far is the PREA button. This button is accessed by an inmate in a housing unit using their kiosk sign in. The PREA button is prominently displayed. The inmate simply pushes the button and logs out of the kiosk. A message is automatically generated and a text is sent directly to the PREA Coordinator and several other strategically selected staff members stating the inmate is in need of help due to PREA related issues. This is a process that takes mere seconds to complete and action is immediately taken to protect the inmate and investigate the reason for the inmate pushing the PREA button. Auditor observed the process during the onsite tour and confirmed the expediency of the process. Auditor was later in the onsite audit able to observe a live activation of the process. An inmate pressed the PREA button, a text was received by the PREA Coordinator while being interviewed by Auditor. The inmate was immediately removed from their housing unit, interviewed and taken to the medical unit for evaluation. This entire process took approximately 20 minutes to complete.

FINDING: AGENCY EXCEEDS THIS ELEMENT

115.52 (g) The agency may discipline an inmate for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the inmate filed the grievance in bad faith.

Agency policy 10.6.002, section I, subsection f, page 13, allows for an inmate to be disciplined for filing a grievance alleging sexual abuse where the grievance filed the grievance in bad faith. Auditor confirmed that this policy is known and in practice through interviews of PREA Coordinator. Auditor had no disciplinary documentation for Auditor to review because Agency has not had any incidents in the past 12 months where an inmate was disciplined for submitting a grievance in bad faith.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Resource Coordinator c. Inmates d. Staff 4. Onsite facility tour <p>115.53 (a) The facility shall provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates 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 inmates and these organizations and agencies, in as confidential a manner as possible.</p> <p>Agency policy 10.6.002, section F, subsection 6, page 9, directs that an outside victim advocate will be made available to inmates. During the onsite facility tour, Auditor observed signage in every housing unit listing the outside agency available for these services and contact information. Agency allows inmates reasonable access to communication with the agency while out of their cell or off of their bunks and allowed to use the telephone. Inmates may write to the agency at any time. Auditor attempted to call the provided number from a phone in every housing unit within the facility. The number did not go to an outside advocate service, but to an automated answering service and there was no indication that the call was free or unmonitored. This issue was immediately brought up to the PREA Coordinator who began working on the issue during the onsite audit. The number was found to not be a free call and was being monitored. These two issues were immediately corrected by the PREA Coordinator. Auditor had no fewer than three separate conversations with different staff, up to and including the Sheriff on this issue. Agency has been working on this issue since the onsite audit based on phone conversations with the PREA Auditor, post onsite audit.</p> <p>FINDING: AGENCY DOES NOT MEET THIS ELEMENT</p> <p>VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:</p> <p>The Auditor was provided supplemental documentation on September 06, 2017 and on October 23, 2017 to evidence and demonstrate corrective actions taken by the WCSO administration regarding this standard. On November 06, 2017, agency provided photographic evidence of the PREA posters in each unit being updated with the correct Sexual Assault Hot Line number. This documentation is discussed below.</p>

ADDITIONAL DOCUMENTATION REVIEWED:

1. Agency provided updated PREA policy which provides an accurate and appropriate confidential reporting agency.
2. Agency also provided a photograph of the updated PREA poster that is displayed in all housing units. The update includes the number of the Sexual Assault Hotline listed only as "Confidential". The number is accurate and verified by Auditor by calling the number directly.

REVISED CONCLUSION: AGENCY MEETS THIS ELEMENT

115.53 (b) The facility shall inform inmates, 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.

Agency policy 10.6.002, section F, subsection 6 a, page 9 states inmate shall be informed prior to giving them access, of the extent to which such communications will be monitored and reports forwarded to authorities. Auditor found through testing of the system that Agency was not compliant with this element of the standard. Agency began working on this issue during the onsite audit.

FINDING: AGENCY DOES NOT MEET THIS ELEMENT

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

The Auditor was provided supplemental documentation on September 06, 2017 and on November 06, 2017 to evidence and demonstrate corrective actions taken by the WCSO administration regarding this standard.

This documentation is discussed below.

ADDITIONAL DOCUMENTATION REVIEWED:

1. Agency provided updated PREA policy which provides an accurate and appropriate confidential reporting agency.
2. Agency also provided photographic evidence of updated PREA posters in all housing units which indicates which number is confidential and which is official.
3. Agency also provided a screen shot of the inmate phone system, confirming that both numbers provided are free and unmonitored.

REVISED CONCLUSION: AGENCY MEETS THIS ELEMENT

115.53 (c) The agency shall maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates 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.

Agency is actively attempting to obtain and maintain a memorandum of understanding with community service providers for confidential emotional support services. On July 12, 2017, auditor was provided an MOU between the WCSO and the local Sexual Assault Center dated 10 July, 2017.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: Agency must provide inmates with access to outside emotional support services which is accurate, toll free and the extent to which the call will be monitored. This updated number and confidentiality admonishments must be prominently displayed within the housing units or otherwise communicated to the inmate population. Proof of these changes must be provided to Auditor prior to the end of the corrective action period to be in compliance.

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO PREA brochure 3. WCSO website 4. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator <p>115.54 (a) 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 an inmate.</p> <p>Agency has provided several ways for third party reporting to occur which includes toll free calls, in person reporting from a third party and direct numbers to detention administration and the PREA Coordinator. All of these methods of reporting are outlined on the agency website under PREA Information. Third party reporting from within the detention center is also encouraged by Agency providing multiple ways for inmates to report to include in-person reporting, grievance, PREA button on the kiosks located in every housing unit and direct messaging to the PREA Coordinator through the kiosk messaging system.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>CORRECTIVE ACTION: NONE</p>

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2. WCSO policy 10.6.002 4. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Detention staff <p>115.61 (a) The agency shall require all staff to report immediately and according to agency policy any knowledge, suspicion, or information 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 inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</p> <p>Agency policy 10.6.002, section J, subsection 1, page 14 requires staff to report incidents of or suspicion of sexual abuse or sexual harassment, any retaliation for reporting and any staff neglect that may have contributed to an incident or retaliation. Auditor confirmed the policy is known and followed through staff interviews. There were no cases of staff reporting of sexual abuse or sexual harassment for Auditor to review during the onsite audit. There have been no reported sexual assaults reported within this within this detention center. All sexual harassment claims have come through direct inmate reporting.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.61 (b) Apart from reporting to designated supervisors or officials, staff shall not reveal 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.</p> <p>Agency policy 10.6.002, section J, subsection 3, page 14 directs all staff not to reveal any PREA related information other than to the extent necessary to make treatment, investigation, security and management decisions. Auditor confirmed this policy is known and adhered to through policy review, staff interviews and review of Agencies secure information system. Agency currently keeps all PREA related information in computer files, accessed only through position and password. Agency is having a secure PREA server configured to keep all PREA information. The server will only be accessed by those with authorization through the PREA Coordinator. While the server was not fully configured at the time of the onsite audit, Auditor was given access to the portion which had been created. The creation of a stand alone server for PREA related information is above and beyond the requirements of Standard 115.61.</p> <p>FINDING: AGENCY EXCEEDS THIS ELEMENT</p> <p>115.61 (c) Unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners shall be required to report sexual abuse pursuant to paragraph (a) of this</p>

section and to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services.

Agency policy 10.6.002, section J, subsection 2, page 14 requires medical/mental health practitioners to report and to inform inmates of the practitioner's duty to report and the limitations of confidentiality at the initiation of services. While policy states this and interviews with medical/mental health staff confirms that this is being done, there was no documentation of this admonishment available for Auditor to review. Auditor met with medical staff on this issue and a form was created on scene to bring agency into compliance. While creation of this form or some other documentation of compliance is necessary, agency must show proof of practice.

FINDING: AGENCY DOES NOT MEET THIS ELEMENT

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

The Auditor was provided supplemental documentation on October 23, 2017 and on November 09, 2017 to evidence and demonstrate corrective actions taken by the WCSO administration regarding this standard.

This documentation is discussed below.

ADDITIONAL DOCUMENTATION REVIEWED:

1. Agency provided updated PREA policy .
2. Agency also provided numerous completed "Patient's Consent for Treatment" forms which includes wording which causes the inmate to know that by signing the document, they understand that information may need to be reported to outside entities. Agency has all inmates, at the time of booking, sign this form and it is kept in each inmates, individual booking jacket.

REVISED CONCLUSION: AGENCY MEETS THIS ELEMENT

115.61 (d) If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.

Agency policy 10.6.002, section J, subsection 5, page 14 mirrors this element. While agency can house inmates under the age of 18, there were no youthful offenders incarcerated at the WCSO at the time of the onsite audit, nor has there been a youthful offender housed in the facility in the previous 12 month period. Therefore, there was not documentary evidence for auditor to review related to this element.

FINDING: AGENCY MEETS THIS ELEMENT

115.61 (e) The facility shall report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators.

Agency policy 10.6.002, section J, subsection 4, page 14 directs that all reports of sexual abuse and sexual harassment, including third-party and anonymous reports be forwarded to

the facilities designated investigators. All allegations are forwarded to the PREA Coordinator, who is also the Detention investigator for non criminal offenses. All criminal offenses are forwarded to the Criminal investigations section of the agency. There has never been a sexual assault reported or investigated within the detention division of the agency. All allegations have been sexual harassment related and have been investigated by the PREA Coordinator. Auditor confirmed that this policy is known and practiced through interviews with the PREA Coordinator and the agencies criminal investigative personnel.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: Agency must provide Auditor with medical document signed at Intake communicating medicals requirements related to mandatory reporting and confidentiality. Agency must show proof of practice by providing Auditor, signed documents.

115.62	Agency protection duties
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO PREA Written response plan 3. Observation during onsite audit 4. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Staff c. Inmates <p>115.62 (a) When an agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate.</p> <p>Agency policy 10.6.002, section A, subsections 1-4, page 4 directs that staff will take immediate action to protect inmates when they learn of substantial risk of imminent sexual abuse. Auditor confirmed through interviews with the PREA Coordinator, other staff and inmates, that this policy is known and practiced. Auditor was witness to one incident during the onsite audit. Agency provides several methods for an inmate to communicate that they are in immediate need for action from staff. One such way is the use of a PREA button located on the electronic kiosks in all inmate housing areas. When an inmate presses this button, a text is immediately sent to the PREA Coordinator, PREA Manager and Services Lieutenant. The inmate is immediately pulled from the housing unit and the process of investigation begins. During an interview with the PREA Coordinator, the Coordinator received a text that an inmate had pressed the PREA button on a kiosk. The Coordinator immediately called to have the inmate removed from the unit to be interviewed. The inmate was immediately brought to a specified interview room, where she was interviewed. Following the interview, the inmate was immediately taken to medical for evaluation. The process was immediately implemented and the inmate received a coordinated response which took approximately 20 minutes from beginning to end. Agency has put into place a very good system for inmates to report and then follows it up with a prompt and thorough response.</p> <p>FINDING: AGENCY EXCEEDS THIS ELEMENT</p> <p>CORRECTIVE ACTION: NONE</p>

115.63	Reporting to other confinement facilities
	<p data-bbox="248 168 898 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="248 248 523 284">Auditor Discussion</p> <p data-bbox="248 329 970 365">Evidence reviewed (documents, interviews, site review)</p> <ol data-bbox="248 371 932 573" style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Document review 4. Interviews with the following: <ol data-bbox="248 539 523 573" style="list-style-type: none"> a. PREA Coordinator <p data-bbox="248 629 1469 745">115.63 (a) Upon receiving an allegation that an inmate 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.</p> <p data-bbox="248 797 1481 1043">Agency policy 10.6.002, section J, subsection 6, page 14 directs that allegations of abuse at another facility, received from an inmate in the custody of the WCSO, be reported to the head of the other facility, within 72 hours of receiving the allegation. Policy also directs that all such allegations and reporting will be documented. There was one allegation of this type received in the previous 12 month period. Auditor was given access to this case and able to confirm that the report was made within the specified time period and was fully documented.</p> <p data-bbox="248 1099 831 1135">FINDING: AGENCY MEETS THIS ELEMENT</p> <p data-bbox="248 1189 1461 1261">115.63 (b) Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.</p> <p data-bbox="248 1317 1481 1563">Agency policy 10.6.002, section J, subsection 6, page 14 directs that allegations of abuse at another facility, received from an inmate in the custody of the WCSO, be reported to the head of the other facility, within 72 hours of receiving the allegation. Policy also directs that all such allegations and reporting will be documented. There was one allegation of this type received in the previous 12 month period. Auditor was given access to this case and able to confirm that the report was made within the specified time period and was fully documented.</p> <p data-bbox="248 1619 831 1655">FINDING: AGENCY MEETS THIS ELEMENT</p> <p data-bbox="248 1709 1238 1744">115.63 (c) The agency shall document that it has provided such notification.</p> <p data-bbox="248 1798 1481 2045">Agency policy 10.6.002, section J, subsection 6, page 14 directs that allegations of abuse at another facility, received from an inmate in the custody of the WCSO, be reported to the head of the other facility, within 72 hours of receiving the allegation. Policy also directs that all such allegations and reporting will be documented. There was one allegation of this type received in the previous 12 month period. Auditor was given access to this case and able to confirm that the report was made within the specified time period and was fully documented.</p> <p data-bbox="248 2101 831 2136">FINDING: AGENCY MEETS THIS ELEMENT</p>

115.63 (d) The facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards.

Agency reports receiving one such allegation reported to them by another agency. Auditor was provided access to all PREA related allegations and was able to confirm through documentation, that all allegations have been thoroughly investigated.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 (Appendix A, PREA Written Response Plan) 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Commissioned Staff c. Non commissioned staff d. Volunteers <p>115.64 (a) Upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report shall be required to: (1) Separate the alleged victim and abuser; (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; (3) If the abuse occurred within a time period that still allows for the collection of physical evidence, 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; and (4) If the abuse occurred within a time period that still allows for the collection of physical evidence, 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.</p> <p>Agency policy 10.6.002, Appendix A, section C, subsections 1-2, page 2, directs that all actions listed in this element are completed. There were no allegations requiring this level of response in the past 12 month period for Auditor to review. Interviews with PREA Coordinator as well as random staff, confirms that this policy is known and being followed. Agency also provides a laminated PREA Response Card which outlines the steps listed in this element as well as supervisory duties at a PREA related scene. Auditor was provided one of the cards. Non staff members are provided training on procedures required if an allegation is made to them. Interviews with volunteers as well as non commissioned employees confirmed that training is being done for all who have direct contact with inmates.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.64 (b) 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.</p> <p>Agency policy 10.6.002, Appendix A, section C, subsections 1-2, page 2, directs that all actions listed in this element are completed. There were no allegations requiring this level of response in the past 12 month period for Auditor to review. Interviews with PREA Coordinator as well as random staff, confirms that this policy is known and being followed. Agency also provides a laminated PREA Response Card which outlines the steps listed in this element as well as supervisory duties at a PREA related scene. Auditor was provided one of the cards.</p>

Non staff members are provided training on procedures required if an allegation is made to them. Interviews with volunteers as well as non commissioned employees confirmed that training is being done for all who have direct contact with inmates.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 (Appendix A - PREA Written response plan) 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Services Lieutenant c. Medical staff d. Random staff <p>115.65 (a) 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.</p> <p>Agency policy 10.6.002 (Appendix A - PREA Written response plan) in its entirety is the WCSO written institutional plan to provide a coordinated response to allegations of sexual abuse and sexual harassment. Auditor confirmed that this procedure is in known and practiced through interviews with staff at all levels and observations of agencies response to allegations while at the onsite audit.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>CORRECTIVE ACTION: NONE</p>

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Agency and Detention Command Staff <p>115.66 (a) 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 any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.</p> <p>Agency staff are not employed under or subject to collective bargaining.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.66 (b) 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 §§ 115.72 and 115.76; 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.</p> <p>Agency staff are not employed under or subject to collective bargaining.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>CORRECTIVE ACTION: NONE</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 (Appendix A - PREA Written response plan) 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Document review <p>115.67 (a) The agency shall establish a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff, and shall designate which staff members or departments are charged with monitoring retaliation.</p> <p>Agency policy 10.6.002 (Appendix A - Written response plan), section F, subsection 1, page 3 directs that the agency must protect all inmates and staff who report sexual abuse, sexual harassment or cooperate with an investigation from retaliation. Agency has assigned the PREA Coordinator to monitor retaliation within the Agency.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.67 (b) The agency shall employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.</p> <p>Agency policy 10.6.002 (Appendix A - Written response plan), section F, subsection 3 a - c, pages 3 and 4, establishes two protection measures against retaliation, housing changes for victim or abusers, removal of staff or abuser from contact with the victim and emotional support services for inmates or staff who fear retaliation. Agency has never had an incident of staff needing to be removed from contact with a victim. Agency has had multiple claims of sexual harassment between inmates. Agency routinely separates the alleged victim from the alleged abuser as a precautionary measure. Auditor was able to confirm that these measures are taken through review of the Agency electronic report system.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.67 (c) For at least 90 days following a report of sexual abuse, the agency shall monitor the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff, and shall act promptly to remedy any such retaliation. Items the agency should monitor include any inmate 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.</p>

Agency policy 10.6.002 (Appendix A - Written response plan), section F, subsection 4 a - b, page 4 directs monitoring for retaliation for a minimum of 90 days following a report of sexual abuse. Auditor was given full access to the electronic records of monitoring documentation and found that Agency does in fact monitor for retaliation for at least 90 days and has not had an incident of retaliation.

FINDING: AGENCY MEETS THIS ELEMENT

115.67 (d) In the case of inmates, such monitoring shall also include periodic status checks.

Agency policy 10.6.002 (Appendix A - Written response plan), section F, subsection 4 a 1, page 4 directs that periodic status checks be part of the 90 monitoring period, post allegation of sexual abuse. Auditor was able to confirm through documentation review that agency does conduct periodic status checks. There have been no incidents of retaliation for Auditor to review.

FINDING: AGENCY MEETS THIS ELEMENT

115.67 (e) 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.

Agency policy 10.6.002 (Appendix A - Written response plan), section F, subsection 5, page 4 directs that Agency must take appropriate measures to protect any other individual who cooperates with an investigation and expresses fear of retaliation. Agency has not had to put this policy into practice to date. Auditor had no documented incidents of this nature to review during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

115.67 (f) An agency's obligation to monitor shall terminate if the agency determines that the allegation is unfounded.

Agency policy 10.6.002 (Appendix A - Written response plan), section F, subsection 6, page 4, mandates this element. Auditor was able to confirm through electronic records that monitoring for retaliation does in fact terminate if an allegation is determined to be unfounded. However, during interviews with the PREA Coordinator, Auditor learned that while the Agencies obligation to monitor for retaliation ends upon the unfounded determination, that the PREA Coordinator will continue monitoring for retaliation as a precautionary measure.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator 4. Document review <p>115.68 (a) Any use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse shall be subject to the requirements of § 115.43.</p> <p>Agencies use of segregated housing is subject to the requirements of Standard 115.43 as shown in the narrative regarding Standard 115.43 listed below:</p> <p>115.43 (a) Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.</p> <p>Agency policy 10.6.002, section H, subsection 7 a, page 11, mirrors standard 115.43 (a). There were no inmates being housed involuntarily in segregated housing based on the inmates high risk for sexual victimization, no have there been inmates housed for this reason within the past 12 months. There were no files to be reviewed by Auditor during the onsite audit.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.43 (b) Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document: (1) The opportunities that have been limited; (2) The duration of the limitation; and (3) The reasons for such limitations.</p> <p>Agency policy 10.6.002, section H, subsection 7 c, page 11, specifically states that inmates placed in segregated housing shall have access to programs, privileges and work opportunities to the extent possible and if such access is limited, Agency shall document the limitation, its duration and the reason for the limitation. There have been no inmates placed in segregated housing for the purpose stated in Standard 115.43 (a) in the past 12 months. Auditor had no files to review for this standard during the onsite audit.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p>

115.43 (c) The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days.

Agency policy 10.6.002, section H, subsection 7 d, page 11, addresses this element of the standard directly. There have been no inmates placed in segregated housing for the purpose stated in Standard 115.43 (a) in the past 12 months. Auditor had no files to review for this standard during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

115.43 (d) If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, the facility shall clearly document: (1) The basis for the facility's concern for the inmate's safety; and (2) The reason why no alternative means of separation can be arranged.

No inmates have been housed pursuant to paragraph (a). Auditor reviewed a variety of random classification documents unrelated to PREA where the basis for the Agencies actions were clearly stated as well as what actions were taken. Auditor had no inmate classification files related to paragraph (a) to review, however, document reviews show that Agency thoroughly and consistently documents its actions.

FINDING: AGENCY MEETS THIS ELEMENT

115.43 (e) Every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.

Agency policy 10.6.002, section H, subsection 7 e, page 12, directs that every 30 days, inmates shall be afforded a review to determine whether continued separation is necessary. Agency had no inmates involuntarily segregated based on this standard, however, Agency reviews all segregated inmates every 30 days. Auditor confirmed compliance with this practice through interviews with PREA Coordinator as well as electronic document review of classification files.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

The finding for Standard 115.68 is as follows

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.71	Criminal and administrative agency investigations
	<p data-bbox="248 170 898 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="248 248 523 282">Auditor Discussion</p> <p data-bbox="248 327 970 360">Evidence reviewed (documents, interviews, site review)</p> <ol data-bbox="248 371 1070 573" style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. WCSO policy 10.6.002 (Appendix A - Written response plan) 4. Interviews with the following: <ol data-bbox="248 539 523 573" style="list-style-type: none"> a. PREA Coordinator <p data-bbox="248 629 1461 741">115.71 (a) 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.</p> <p data-bbox="248 797 1469 999">Allegations of sexual abuse or sexual harassment are handled by Agency. Auditor confirmed that investigations are conducted promptly, thoroughly and objectively through case review of investigations previously conducted. There were no third party or anonymous reports for auditor to review. There were also no criminal cases available for Auditor to review. Auditor also viewed first hand the investigation of an allegation made during the onsite audit.</p> <p data-bbox="248 1055 831 1088">FINDING: AGENCY MEETS THIS ELEMENT</p> <p data-bbox="248 1144 1390 1211">115.71 (b) Where sexual abuse is alleged, the agency shall use investigators who have received special training in sexual abuse investigations pursuant to § 115.34.</p> <p data-bbox="248 1267 1469 1424">Agency conducts all its own administrative as well as criminal investigations. All investigations are conducted by staff, specifically trained in conducting such investigations in a confinement setting. Auditor was provided training certificates for those staff specifically trained to conduct administrative and criminal investigations in a custody setting.</p> <p data-bbox="248 1480 831 1514">FINDING: AGENCY MEETS THIS ELEMENT</p> <p data-bbox="248 1570 1461 1727">115.71 (c) 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.</p> <p data-bbox="248 1783 1477 2119">Agency policy 10.6.002, (Appendix A - Written response plan), section H, subsection 3 a - c, pages 4 - 5, mirrors 115.71 (c). While there were no criminal investigations for Auditor to review, nor were there any allegations of sexual abuse, Auditor reviewed numerous administrative investigations where these elements were met in each. Auditor also confirmed this policy/procedure is in known and practiced through interviews with PREA Coordinator and random staff. Auditor was also provided a laminated card given to all staff, which outlines steps to be taken in the case of an allegation of sexual abuse, that are in line with this element as well.</p>

FINDING: AGENCY MEETS THIS ELEMENT

115.71 (d) 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.

Agency will consult with the District Attorney's Office pursuant to Agency policy 10.6.002 (Appendix A - Written response plan), section H, subsection 4, page 5. Consultations with the District Attorney's Office prior to conducting compelled interviews will be done when there is a question as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. Auditor confirmed this policy is known and practiced through interviews with PREA Coordinator and Investigative staff. Consultations of this type are not done as a rule on every allegation. There were no criminal cases for Auditor to review during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

115.71 (e) 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 inmate or staff. No agency shall require an inmate 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.

Agency policy 10.6.002 (Appendix A - Written response plan), section H, subsection 5 - 6, page 5 directs that the credibility of an alleged victim be assessed on a case by case basis and that inmates have no requirement to submit to a polygraph or other truth-telling device as a condition for proceeding with an investigation of an allegation of sexual abuse or sexual harassment. Auditor confirmed this policy is known and in place through interviews with PREA Coordinator and investigative staff. Auditor also reviewed numerous administrative investigation files, none of which utilized polygraph or other truth-telling devices.

FINDING: AGENCY MEETS THIS ELEMENT

115.71 (f) 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.

Auditor reviewed numerous administrative investigation files during the onsite audit. All elements of 115.71 (f) were present in all reports reviewed.

FINDING: AGENCY MEETS THIS ELEMENT

115.71 (g) 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.

While agency is responsible for conducting all criminal PREA investigations, there were no criminal investigations for auditor to review. Auditor confirmed that

Agency policy 10.6.002 (Written response plan), section H, subsection 8, page 5, which mirrors 115.71 (g) is known and in practice, through interviews with PREA Coordinator and investigative staff.

FINDING: AGENCY MEETS THIS ELEMENT

115.71 (h) Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution.

As directed in Agency policy 10.6.002, section H, subsection 10, page 5, substantiated allegations of conduct that appears criminal shall be referred for prosecution. However, there have been no allegations referred for prosecution for Auditor to review.

FINDING: AGENCY MEETS THIS ELEMENT

115.71 (i) The agency shall retain all written reports referenced in paragraphs (f) and (g) of this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

Agency policy 10.6.002, section H, subsection 9, page 5, directs that written reports resulting from administrative and criminal investigations be retained for as long as the alleged abuser is incarcerated or employed by the Agency, plus 5 years. All administrative reports have been kept since the implementation of this procedure on 1 January, 2015. There have been no criminal investigations to retain to this point in time.

FINDING: AGENCY MEETS THIS ELEMENT

115.71 (j) 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.

No investigation shall be terminated due to the departure of the alleged abuser or victim from the employment or control of the facility, per Agency policy 10.6.002 (Appendix A, Written response plan), section H, subsection 11, page 6. There were no cases, either administrative or criminal, where the victim or abuser left the facility or employment, for Auditor to review. Auditor confirmed the knowledge and practice of this policy through interviews with PREA Coordinator.

FINDING: AGENCY MEETS THIS ELEMENT

115.71 (k) Any State entity or Department of Justice component that conducts such investigations shall do so pursuant to the above requirements.

Agency conducts it's own investigations.

FINDING: AGENCY MEETS THIS ELEMENT

115.71 (l) 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.

Agency conducts it's own investigations.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 (Appendix A Written response plan) 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator 4. Document review <p>115.72 (a) 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.</p> <p>Agency policy 10.6.002 (Appendix A Written response plan), section H, subsection 7 c, page 5, directs that Agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. No allegations of sexual abuse has ever been investigated, however, sexual harassment is a more frequent complaint. Auditor confirmed that this policy is known and followed through interviews with PREA Coordinator who is responsible for investigating all PREA allegations as well as document review of all cases investigated in the previous 12 months. All cases held to the preponderance of the evidence standard.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>CORRECTIVE ACTION: NONE</p>

115.73	Reporting to inmates
Auditor Overall Determination: Meets Standard	
Auditor Discussion	
<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 (Appendix A Written response plan) 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator 4. Document review <p>115.73 (a) Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, the agency shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.</p> <p>Agency policy 10.6.002 (Appendix A Written response plan), section I, subsection 1, page 6 states that the PREA Coordinator or their designee shall inform an inmate who has alleged that he/she was sexually abused, whether the allegation was found to be substantiated, unsubstantiated or unfounded. Agency has yet to have an allegation of this type and therefore, Auditor had no documentation to review during the onsite audit. Auditor was able to confirm that the policy is known through interviews with PREA Coordinator and staff.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.73 (b) If the agency did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the inmate.</p> <p>Agency conducts it's own investigations.</p> <p>FINDING: N/A</p> <p>115.73 (c) Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever: (1) The staff member is no longer posted within the inmate'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.</p> <p>Agency policy 10.6.002 (Appendix A Written response plan), section I, subsection 2 a - d, page 6, mirrors 115.73 (c). There have been no allegations against staff in the previous 12 month period for Auditor to review. Auditor confirmed that this policy is known through interviews with PREA Coordinator.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.73 (d) Following an inmate's allegation that he or she has been sexually abused by</p>	

another inmate, 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.

Agency policy 10.6.002 (Appendix A Written response plan), section I, subsection 3 a - b, page 6, mirrors 115.73 (d). Agency has yet to receive it's first allegation of this type. Auditor had no documentation of this type to review during the onsite audit. Auditor confirmed that the policy is known through interviews with PREA Coordinator.

FINDING: AGENCY MEETS THIS ELEMENT

115.73 (e) All such notifications or attempted notifications shall be documented.

Agency policy 10.6.002 (Appendix A Written response plan), section I, subsection 4, page 6, directs that all notifications or attempted notifications be documented. There have been no such notifications or attempts in the previous 12 months and therefore there were no documents for Auditor to review. Auditor confirmed the policy is known through interviews with the PREA Coordinator.

FINDING: AGENCY MEETS THIS ELEMENT

115.73 (f) An agency's obligation to report under this standard shall terminate if the inmate is released from the agency's custody.

Agency policy 10.6.002 (Appendix A Written response plan), section I, subsection 5, page 6 alleviates Agencies obligation to report to the inmate if the inmate is released from WCSO custody. Auditor confirmed this policy is known through interviews with PREA Coordinator, however, there were no documentation of this process in the past 12 months for Auditor to review.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.76	Disciplinary sanctions for staff
	<p data-bbox="252 168 901 201">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 246 526 280">Auditor Discussion</p> <p data-bbox="252 324 973 358">Evidence reviewed (documents, interviews, site review)</p> <ol data-bbox="252 369 933 616" style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 4. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Division Lieutenant c. Division Commander <p data-bbox="252 660 1444 750">115.76 (a) Staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.</p> <p data-bbox="252 795 1460 1086">Agency policy 10.6.002, section L, subsection 3, page 15, clearly states that staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. There has never been a staff member disciplined for violating agency PREA policies and therefore, there were no documents for Auditor to review during the onsite audit. Interviews with PREA Coordinator, Division Lieutenant, Division Commander and the Sheriff, all confirm that violations of PREA policies would be taken on a case by case basis.</p> <p data-bbox="252 1131 837 1164">FINDING: AGENCY MEETS THIS ELEMENT</p> <p data-bbox="252 1220 1396 1310">115.76 (b) Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.</p> <p data-bbox="252 1355 1476 1556">Agency policy 10.6.002, section L, subsection 4, page 16 directs that termination is the presumptive disciplinary sanction for a staff member who commits sexual abuse. There has never been an allegation of this type so there were no documents for Auditor to review during the onsite audit. Interviews with PREA Coordinator, Division Lieutenant, Division Commander and Sheriff, all confirm that termination would occur in a case of sexual abuse.</p> <p data-bbox="252 1601 837 1635">FINDING: AGENCY MEETS THIS ELEMENT</p> <p data-bbox="252 1691 1452 1892">115.76 (c) 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.</p> <p data-bbox="252 1948 1476 2150">Agency policy 10.6.002, section L, subsection 3 a, pages 15 - 16, direct that disciplinary sanction follow PREA Standard 115.76 (c). There have been no violations of this type in the past 12 months and therefore, there were no documents for Auditor to review during the onsite audit. Interviews with PREA Coordinator, Division Lieutenant, Division Commander and Sheriff all stated that sanctions for violation of PREA polices would be taken individually.</p>

FINDING: AGENCY MEETS THIS ELEMENT

115.76 (d) 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.

While Agency policy 10.6.002, section L, subsection 5, page 16 states that 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. There have been no such terminations or resignation of this type in the past 12 months. There were no documents available for Auditor to review. Auditor confirmed the policy is known through interviews with PREA Coordinator and Division Lieutenant.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator <p>115.77 (a) Any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.</p> <p>Agency policy 10.6.002, section N, subsection 1, page 16 directs that any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. There has never been an allegation of this type within the WCSO, so there were not documents for Auditor to review during the onsite audit. Auditor confirmed the policy is known through interviews with the PREA Coordinator.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.77 (b) The facility takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p>Agency policy 10.6.002, section N, subsection 2, page 16 - 17, directs that the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. There has never been a need for Agency to take any sort of remedial measures against a contractor or volunteer. Auditor had no documentation to review during the onsite audit. Auditor confirmed that the policy is known through interviews with the PREA Coordinator.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>CORRECTIVE ACTION: NONE</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Services Lieutenant <p>115.78 (a) Inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.</p> <p>Agency policy 10.6.02, section M, subsection 1, page 16, states inmates shall be subject to formal disciplinary sanctions following an administrative or criminal finding that the inmate sexually abused another inmate. Auditor confirmed this policy is known and is in practice through interviews with PREA Coordinator. However, Agency has never had a report of sexual abuse and therefore there were no cases for Auditor to review during the onsite audit.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.78 (b) Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.</p> <p>Agency policy 10.6.02, section M, subsection 2, page 16, states sanctions following an administrative or criminal finding that the inmate sexually abused another inmate shall be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. Auditor confirmed this policy is known and is in practice through interviews with PREA Coordinator. However, Agency has never had a report of sexual abuse and therefore there were no cases for Auditor to review during the onsite audit.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.78 (c) The disciplinary process shall consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.</p> <p>Agency policy 10.6.02, section M, subsection 2 a, page 16 directs that the disciplinary process consider whether an inmates mental disabilities or mental illness contributed to his or her behavior in determining appropriate behavior. Auditor confirmed this policy is known and is in practice through interviews with PREA Coordinator. However, Agency has never had a report of sexual abuse and therefore there were no cases for Auditor to review during the onsite audit.</p>

FINDING: AGENCY MEETS THIS ELEMENT

115.78 (d) 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 require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.

Agency does not offer therapy, counseling or other interventions designed to address and correct underlying reasons or motivations for abuse.

FINDING: N/A

115.78 (e) The agency may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

Agency policy 10.6.002, section M, subsection 3, page 16, states an inmate may be disciplined for sexual contact with staff only upon a finding that the staff member did not consent to such contact. Auditor confirmed that this policy is known and in practice through interviews with PREA Coordinator, however, there has never been a report of sexual contact between an inmate and staff. Auditor had no reports to review regarding this element.

FINDING: AGENCY MEETS THIS ELEMENT

115.78 (f) 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.

Agency policy 10.6.002, section M, subsection 4, page 16, mirrors 115.78 (f). Auditor confirmed that this policy is known and in practice, however, there has never been a report of sexual abuse made by an inmate housed at the WCSO. There were no documented cases for Auditor to review during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

115.78 (g) An agency may, in its discretion, prohibit all sexual activity between inmates and may discipline inmates for such activity. An agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced.

Agency prohibits all sexual activity between inmates through Agency policy 10.6.002, section M, subsection 5, page 16, however, this activity shall not be deemed sexual abuse if the activity is not coerced. Auditor confirmed this policy is known and in practice through interviews with PREA Coordinator. There has never been an incident of this type that the PREA Coordinator could find. Therefore, there were no documents for Auditor to review during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Medical personnel 4. Document review <p>115.81 (a) If the screening pursuant to § 115.41 indicates that a prison/jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.</p> <p>Agency policy 10.6.002, section G, subsection 8, page 10 states that if Agency finds out during the screening process that an inmate has experienced prior victimization, Agency must have the inmate follow up with a medical or mental health practitioner within 14 days. Agency screens all inmates for prior victimization during the screening process and the inmate is seen by medical or mental health while the inmate is in the Intake area. This process never exceeds 12 hours. Auditor was able to confirm that this policy is known and in practice through interviews with PREA Coordinator and Medical staff. In the previous 12 months, no inmate has reported prior victimization. Therefore, there was no documentation for Auditor to review during the onsite audit.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.81 (b) If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening.</p> <p>Agency is a jail and does not house prison inmates.</p> <p>FINDING: N/A</p> <p>115.81 (c) See 115.81(a)</p> <p>Agency policy 10.6.002, section G, subsection 8, page 10 states that if Agency finds out during the screening process that an inmate has experienced prior victimization, Agency must have the inmate follow up with a medical or mental health practitioner within 14 days. Agency screens all inmates for prior victimization during the screening process and the inmate is seen by medical or mental health while the inmate is in the Intake area. This process never exceeds 12 hours. Auditor was able to confirm that this policy is known and in practice through interviews with PREA Coordinator and Medical staff. In the previous 12 months, no inmate has</p>

reported prior victimization. Therefore, there was no documentation for Auditor to review during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

115.81 (d) Any information related to sexual victimization or abusiveness that occurred in an institutional setting is 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.

Agency policy 10.6.002, section G, subsection 6, page 10, mirrors standard 115.81 (d). There were no incidents of this type of information being communicated to Agency in the previous 12 months and therefore no information of this type has been shared. Auditor confirmed this policy is known and in practice through interviews with PREA Coordinator medical/mental health staff.

FINDING: AGENCY MEETS THIS ELEMENT

115.81 (e) Medical and mental health practitioners shall obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18.

Agency policy 10.6.002, section G, subsection 7, page 10 directs medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization outside of an institutional setting unless the inmate is under 18 years of age. Auditor confirmed this policy is known and in practice through interviews with PREA Coordinator and medical/mental health staff. However, there have been no inmates claiming prior victimization outside of an institutional setting, in the previous 12 months. Therefore, Auditor had no documentation of informed consent to review.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 (Appendix A - Written response plan) 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Medical/mental health staff <p>115.82 (a) Inmate 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.</p> <p>Agency policy 10.6.002, appendix A, section D, subsection 1, directs that inmate 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. Auditor confirmed that this policy is known and in practice through interviews with PREA Coordinator, medical and mental health staff. There has yet to be an incident of this type, therefore, there was no documentation for Auditor to review during the onsite audit.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.82 (b) If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant to § 115.62 and shall immediately notify the appropriate medical and mental health practitioners.</p> <p>Agency contracts with a medical/mental health provider who is on site at all times. All reported incidents of recent abuse could be passed on to medical/mental health at any time.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.82 (c) Inmate 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.</p> <p>Agency policy 10.6.002, appendix A, section E, subsections 3 - 4, page 3, directs that inmates 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, following an inmates report of being a victim of sexual abuse while incarcerated. Auditor was able to confirm this policy is known and in practice through interviews with PREA Auditor and medical staff. However, there has not been</p>

a report of sexual abuse in the previous 12 months for Auditor to review.

FINDING: AGENCY MEETS THIS ELEMENT

115.82 (d) 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.

Agency policy 10.6.002, appendix A, section E, subsections 5, page 3 directs that treatment of the type outlined in 115.82 (c), shall be provided without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Auditor confirmed this policy is known and in practice through interviews with PREA Auditor and medical staff. However, there has not been a report of sexual abuse in the previous 12 months for Auditor to review.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 (Appendix A - Written response plan) 4. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Medical/mental health staff <p>115.83 (a) The facility shall offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.</p> <p>Agency policy 10.6.002, appendix A, section E, subsection 1, mirrors Standard 115.83 (a). Auditor confirmed this policy is known and in practice through interviews with PREA Coordinator and medical/mental health staff. There were no reported incidents of sexual abuse in any type of facility in the previous 12 months for auditor to review.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.83 (b) 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.</p> <p>Agency policy 10.6.002, appendix A, section E, subsection 2, mirrors Standard 115.83 (b). Auditor confirmed this policy is known and in practice through interviews with PREA Coordinator and medical/mental health staff. There have been no incidents within the previous 12 month period requiring treatment for sexual abuse of any kind. Auditor had no documentation to review for this element.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.83 (c) The facility shall provide such victims with medical and mental health services consistent with the community level of care.</p> <p>Agency contract with a medical provider for medical/mental health within the detention facility. All medical/mental health care provided is consistent with the community level of care. Any care required, that the contracted medical provider does not provide, is provided within the community. Auditor observed all aspects of medical and mental health care provided within the detention facility during the onsite audit. Auditor is aware of the level of care provided within the community of Franklin Tennessee and confirmed that the Agencies contracted medical/mental health provider is providing the same level of care, based on the services they provide.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p>

115.83 (d) Inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests.

Agency policy 10.6.002, appendix A, section E, subsection 3, page 3 directs that pregnancy tests be offered to victims, based on the nature of the abuse. Auditor confirmed this policy is known and in practice through interviews with PREA Coordinator and medical/mental health staff. There have been no incidents where pregnancy tests for sexually abusive vaginal penetration needed to be offered. There was no documentation for Auditor to review.

FINDING: AGENCY MEETS THIS ELEMENT

115.83 (e) 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 pregnancy-related medical services.

Agency policy 10.6.002, appendix A, section E, subsection 3 a, page 3 directs that such victims shall receive timely and comprehensive information about and access to all lawful pregnancy-related services. There has never been an incident where adherence to this policy was tested. Audit confirmed this policy is known and in practice through interviews with PREA Auditor, medical and mental health staff.

FINDING: AGENCY MEETS THIS ELEMENT

115.83 (f) Inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate.

Agency policy 10.6.002, appendix A, section E, subsection 4, page 3 directs that inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate. Auditor confirmed this policy is known and in practice through interviews with PREA Coordinator, medical and mental health staff. There has never been an incident of sexual abuse reported to Agency, therefore, testing for sexually transmitted infections has never been offered. There was no documentation for Auditor to review during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

115.83 (g) 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.

Agency policy 10.6.002, appendix A, section E, subsection 5, page 3 directs that 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. Auditor confirmed this policy is known and in practice through interviews with PREA Coordinator, medical and mental health staff. There has never been an incident of sexual abuse reported to Agency. There was no documentation for Auditor to review during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

115.83 (h) All prisons attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners.

Agency is not a prison.

FINDING: N/A

CORRECTIVE ACTION: NONE

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Observation of new PREA module under development 4. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator b. Division Lieutenant c. Division Commander <p>115.86 (a) 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.</p> <p>Agency policy 10.6.002, section O, subsection 1 a, page 17, directs that a review team 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. There has never been an incident of sexual abuse for the review team to review. Auditor confirmed that this policy is known and in practice and that the incident review team is in place through interviews with the PREA Coordinator, Division Lieutenant and Division Commander. There was no documentation for Auditor to review during the onsite audit.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.86 (b) Such review shall ordinarily occur within 30 days of the conclusion of the investigation.</p> <p>Agency policy 10.6.002, section O, subsection 1 a, page 17 directs this review shall be conducted within 30 days of the conclusion of a sexual abuse investigation. Auditor confirmed that this policy is known and in practice and that the incident review team is in place through interviews with the PREA Coordinator, Division Lieutenant and Division Commander. There was no documentation for Auditor to review during the onsite audit.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.86 (c) The review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.</p> <p>Agency policy 10.6.002, section O, subsection 1 b, page 17, states the review team shall consist of the Division Lieutenant with input from investigators, medical staff, others with relevant knowledge, and the County Attorney, where appropriate. Auditor confirmed this policy is known and in practice and who will be on this review team when it is put to use. There have</p>

been no incidents of sexual abuse where the review team was utilized in the previous 12 month period. There was no documentation available for auditor to review during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

115.86 (d) The review team shall: (1) Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; (2) Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; (3) Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; (4) Assess the adequacy of staffing levels in that area during different shifts; (5) Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and (6) Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section, and any recommendations for improvement and submit such report to the facility head and PREA compliance manager.

Agency policy 10.6.002, section O, subsection c 1 - 6, page 17, mirrors Standard 115.86 (d). Auditor confirmed this policy is known and in practice and what the team shall consider when it is put to use. There have been no incidents of sexual abuse where the review team was utilized in the previous 12 month period. There was no documentation available for auditor to review during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

115.86 (e) The facility shall implement the recommendations for improvement, or shall document its reasons for not doing so.

Agency policy 10.6.002, section O, subsection c 6 d, page 18, directs that Agency shall implement the recommendations for improvement, or shall document its reasons for not doing so. Auditor confirmed this policy is known and in practice through interviews with PREA Coordinator, Division Lieutenant and Division Commander. There have been no incidents of sexual abuse where the review team was utilized in the previous 12 month period. There was no documentation available for auditor to review during the onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.87	Data collection
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator 4. Document review <ol style="list-style-type: none"> a. 2015 DOJ Survey of Sexual Victimization <p>115.87 (a) 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.</p> <p>Agency policy 10.6.002, section O, subsection 2 a, page 18 directs Agency to collect accurate, uniform information regarding every allegation of sexual abuse.</p> <p>Agency completed and provided the completed 2015, Survey of Sexual Victimization form where agency collects accurate, uniform data for its facility. Auditor is in possession of and has reviewed this document.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.87 (b) The agency shall aggregate the incident-based sexual abuse data at least annually.</p> <p>Agency policy 10.6.002, section O, subsection 2 a 1, page 18, directs Agency to aggregate incident-based sexual abuse date at least annually. Agency provided Auditor the 2016 aggregated incident-based sexual abuse data for review. Auditor is in possession of this data. Auditor confirmed that this data is also posted on the agency website for public review.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.87 (c) 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.</p> <p>Agency collects all data required to answer all question for the Department of Justice (DOJ) Survey of Sexual Violence. However, DOJ has not requested this information from Agency.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.87 (d) 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.</p>

Agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports and investigation files. There have been no sexual abuse incident reviews done in the previous 12 month period for Auditor to review. Auditor was allowed access to all incident-based documents, reports and investigative files during the onsite audit. Auditor reviewed 20 random case reports of the 31 reports generated up to the date of the onsite audit. Auditor retained 7 of the 20 cases reviewed.

FINDING: AGENCY MEETS THIS ELEMENT

115.87 (e) The agency also shall obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates.

Agency does no contract with any other agency to house inmates.

FINDING: N/A

115.87 (f) Upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.

Agency has not been requested to provide data to the DOJ for the previous calendar year.

FINDING: N/A

CORRECTIVE ACTION: NONE

115.88	Data review for corrective action
	<p data-bbox="252 168 901 201">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 246 526 280">Auditor Discussion</p> <p data-bbox="252 324 973 358">Evidence reviewed (documents, interviews, site review)</p> <ol data-bbox="252 369 933 571" style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2. WCSO Annual Corrective Action Review 3. Interviews with the following: <ol data-bbox="252 504 526 537" style="list-style-type: none"> a. PREA Coordinator 4. Website review <p data-bbox="252 627 1460 828">115.88 (a) The agency shall review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: (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.</p> <p data-bbox="252 884 1476 1299">Agency has reviewed collected data pursuant to Standard 115.87 and has completed the Annual Corrective Action Review for years 2015 and 2016 which takes into consideration all areas listed in Standard 115.88 (a). Agency provided this Corrective Action Review for Auditor to review during the onsite audit. The Corrective Action Review identifies four problem areas. The review also includes corrective action items to include increase in video monitoring, increased frequency of safety and security checks by staff, unannounced rounds by supervisors, improved documentary and investigatory processes due to the newly created PREA module in the agencies Jail management system, utilization of an advanced investigation team which investigates any and all harassment/abuse complaints and an outline of advanced training given to the agencies line deputies.</p> <p data-bbox="252 1355 869 1388">FINDING: AGENCY EXCEEDS THIS ELEMENT</p> <p data-bbox="252 1444 1468 1556">115.88 (b) 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.</p> <p data-bbox="252 1612 1452 1814">Agency has completed one Annual Corrective Action Review and has aggregated one years worth of data. There is no comparison data for 2017 at this time, however, based on interviews with PREA Coordinator, Auditor is confident data will be compared year to year. Both the Annual Corrective Action Review and the 2016 yearly totals are posted on Agency website.</p> <p data-bbox="252 1870 837 1904">FINDING: AGENCY MEETS THIS ELEMENT</p> <p data-bbox="252 1960 1428 2027">115.88 (c) 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.</p> <p data-bbox="252 2083 1460 2150">Agency's Annual Corrective Action Review have been signed by the agency head and are posted on Agency website. Auditor confirmed the signed document and observed the review</p>

posted on the website for public viewing.

FINDING: AGENCY MEETS THIS ELEMENT

115.88 (d) 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.

Agency understands the need and their authorization to redact sensitive information as evidenced by the Annual Corrective Action Review. This review does not include an information which would present a clear and specific threat to the safety and security of their facility.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO policy 10.6.002 3. WCSO Website 4. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator <p>115.89 (a) The agency shall ensure that data collected pursuant to § 115.87 are securely retained.</p> <p>Agency is in the process of having a secure server built specifically designed for PREA related data. The majority of the work on the server had been completed at the time of the onsite audit. The PREA Coordinator demonstrated to Auditor the functionality of the new server as well as explaining how the server will not only be accessible by password but its accessibility will be limited to a very small number of people within the agency. At the time of the onsite audit, PREA data was collected and stored by the PREA Coordinator in electronic form, protected by access permissions and password.</p> <p>FINDING: AGENCY EXCEEDS THIS ELEMENT</p> <p>115.89 (b) 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.</p> <p>Agency has no other facilities under its direct control and does not contract with private facilities to house inmates.</p> <p>FINDING: N/A</p> <p>115.89 (c) Before making aggregated sexual abuse data publicly available, the agency shall remove all personal identifiers.</p> <p>Agency policy 10.6.002, section O, subsection 2 a 2, page 18, directs that personal identifiers shall be removed from aggregated data posted on Agency website. Auditor reviewed all data posted on the website and confirmed that no personal identifiers were included in the aggregated data.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.89 (d) The agency shall maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.</p>

Agency policy 10.6.002, section O, subsection 2 a 2, page 18, requires PREA related data be securely retained for at least 10 years. Agency policy 10.6.002 was signed by the WCSO Sheriff on January 1, 2015, therefore, Agency has not yet reached the 10 year point in order to confirm the length of time data is retained. However, Auditor was given full access to PREA data and PREA data was posted on Agency website from 2015, indicating data is being retained per this policy.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2. Interviews with the following: <ol style="list-style-type: none"> a. PREA Coordinator <p>115.401 (a) 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.</p> <p>Agency began working on PREA compliance in 2015 and were not audit ready until June, 2017.</p> <p>FINDING: N/A</p> <p>115.401 (b) 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.</p> <p>Agency began working on PREA compliance in 2015 and were not audit ready until June, 2017.</p> <p>FINDING: N/A</p> <p>115.401 (h) The auditor shall have access to, and shall observe, all areas of the audited facilities.</p> <p>Auditor was given full access to and observed all areas, internal and external to the facility. This included a maintenance shop, car wash area, gun range and outside work crew staging area.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.401 (i) The auditor shall be permitted to request and receive copies of any relevant documents (including electronically stored information).</p> <p>Auditor requested numerous documents and was provided all that were requested. Auditor was given full access to all electronically stored information from all systems, including medical records.</p> <p>FINDING: AGENCY MEETS THIS ELEMENT</p> <p>115.401 (m) The auditor shall be permitted to conduct private interviews with inmates.</p>

Auditor was given a private office within the facility where private interviews were conducted with inmates. Auditor was given full, unescorted access to the inmate housing units. Inmates were selected at random and retrieved by auditor for private interviews in the designated office.

FINDING: AGENCY MEETS THIS ELEMENT

115.401 (n) Inmates shall be permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.

PREA Audit posters with the date of the audit, Auditors name and P.O. Box address and direction that Inmates shall be permitted to send confidential information or correspondence to Auditor in the same manner as if they were communicating with legal counsel, were posted throughout the facility on or before May 15, 2017. No correspondence was received from inmates prior to the onsite audit nor have there been any post onsite audit.

FINDING: AGENCY MEETS THIS ELEMENT

CORRECTIVE ACTION: NONE

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence reviewed (documents, interviews, site review)</p> <ol style="list-style-type: none"> 1. WCSO Completed Pre-Audit Questionnaire (PAQ) 2 WCSO Website <p>115.403 (f) The agency shall ensure that the auditor’s final report is published on the agency’s website if it has one, or is otherwise made readily available to the public.</p> <p>Agency will be under a corrective action period at the completion of this report and therefore, there is no final report to have published at this time.</p> <p>FINDING: N/A</p> <p>CORRECTIVE ACTION: NONE</p>

Appendix: Provision Findings

115.11 (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

115.11 (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

115.11 (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.)	na
	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

115.12 (a)	Contracting with other entities for the confinement of inmates	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to 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 inmates.)	na

115.12 (b)	Contracting with other entities for the confinement of inmates	
	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 inmates OR the response to 115.12(a)-1 is "NO".)	na

115.13 (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 inmates 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 inmates against sexual abuse?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the generally accepted detention and correctional practices in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any judicial findings of inadequacy in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from Federal investigative agencies in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from internal or external oversight bodies in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration all components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated) in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the composition of the inmate population in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into	yes

	consideration the number and placement of supervisory staff in calculating adequate staffing levels and determining the need for video monitoring?	
	Does the agency ensure that each facility's staffing plan takes into consideration the institution programs occurring on a particular shift in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any applicable State or local laws, regulations, or standards in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the prevalence of substantiated and unsubstantiated incidents of sexual abuse in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any other relevant factors in calculating adequate staffing levels and determining the need for video monitoring ?	yes

115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na

115.13 (c)	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: 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

115.13 (d)	Supervision and monitoring	
	Has the facility/agency 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?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency 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 functions of the facility?	yes

115.14 (a)	Youthful inmates	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes

115.14 (b)	Youthful inmates	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes

115.14 (c)	Youthful inmates	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes

115.15 (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

115.15 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates in non-exigent circumstances? (N/A here for facilities with less than 50 inmates before August 20,2017.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A here for facilities with less than 50 inmates before August 20,2017.)	yes

115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates?	yes

115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility implement a policy and practice that enables inmates 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 an inmate housing unit?	yes

115.15 (e)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes

115.15 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

115.16 (a)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take appropriate steps to ensure that inmates 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: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all	yes

	aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?	
	Does the agency take appropriate steps to ensure that inmates 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: inmates who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates 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: inmates who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates 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: inmates who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates 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 inmates 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 inmates with disabilities including inmates who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates 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 inmates with disabilities including inmates who: are blind or have low vision?	yes

115.16 (b)	Inmates with disabilities and inmates 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 inmates 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

115.16 (c)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes

115.17 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates 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 inmates 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 hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates 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 inmates 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 inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes

115.17 (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 inmates?	yes

115.17 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with inmates, does the agency: perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, 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 abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes

115.17 (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 inmates?	yes

115.17 (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 inmates or have in place a system for otherwise capturing such information for current employees?	no

115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates 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 inmates 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

115.17 (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

115.17 (h)	Hiring and promotion decisions	
	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.)	no

115.18 (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 inmates 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

115.18 (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 inmates 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

115.21 (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.)	yes

115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, 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? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

115.21 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of 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

115.21 (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

115.21 (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 interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes

115.21 (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/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	na

115.21 (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? (N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.21(d) above.)	yes

115.22 (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

115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice 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

115.22 (c)	Policies to ensure referrals of allegations for investigations	
	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 115.21(a).)	na

115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates 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 inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates 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 inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes

115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	no

115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates 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

115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes

115.32 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes

115.32 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with inmates 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 inmates)?	yes

115.32 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes

115.33 (a)	Inmate education	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes

115.33 (b)	Inmate education	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes

115.33 (c)	Inmate education	
	Have all inmates received such education?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes

115.33 (d)	Inmate education	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes

115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes

115.33 (f)	Inmate education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes

115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, 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 115.21(a).)	yes

115.34 (b)	Specialized training: Investigations	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	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 115.21(a).)	yes
	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 115.21(a).)	yes
	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 115.21(a).)	yes

115.34 (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 115.21(a).)	yes

115.35 (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?	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?	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 victims of sexual abuse and sexual harassment?	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?	yes

115.35 (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.)	na

115.35 (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?	yes

115.35 (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 §115.31?	yes
	Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.32?	yes

115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes

115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes

115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes

115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: history of prior institutional violence or sexual abuse?	yes

115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a: Referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Request?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes

115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes

115.41 (i)	Screening for risk of victimization and abusiveness	
	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 inmate's detriment by staff or other inmates?	yes

115.42 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes

115.42 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes

115.42 (c)	Use of screening information	
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems?	yes

115.42 (d)	Use of screening information	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes

115.42 (e)	Use of screening information	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes

115.42 (f)	Use of screening information	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes

115.42 (g)	Use of screening information	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status?	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status?	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status?	yes

115.43 (a)	Protective Custody	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes

115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The opportunities that have been limited?	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The duration of the limitation?	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The reasons for such limitations?	yes

115.43 (c)	Protective Custody	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes

115.43 (d)	Protective Custody	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes

115.43 (e)	Protective Custody	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes

115.51 (a)	Inmate reporting	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes

115.51 (b)	Inmate reporting	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	no
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	no
	Does that private entity or office allow the inmate to remain anonymous upon request?	no
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security?	yes

115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes

115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes

115.52 (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 inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate 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

115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates 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 inmate 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

115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate 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

115.52 (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 inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate 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 inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes

115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates 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 inmates? (If a third party files such a request on behalf of an inmate, 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 inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes

115.52 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate 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 an inmate 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 the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	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 inmate 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

115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes

115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	no
	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 inmates and these organizations and agencies, in as confidential a manner as possible?	yes

115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, 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

115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates 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

115.54 (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 an inmate?	yes

115.61 (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 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 regarding retaliation against inmates 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 regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes

115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain 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

115.61 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes

115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes

115.61 (e)	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

115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes

115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate 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

115.63 (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

115.63 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes

115.63 (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

115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate 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 an inmate 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 an inmate 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 an inmate 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

115.64 (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

115.65 (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

115.66 (a)	Preservation of ability to protect inmates 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 limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no

115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes

115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

115.67 (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 inmates 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 inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates 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 inmate 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 inmate 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 inmate 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

115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes

115.67 (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

115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes

115.71 (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/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes

115.71 (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 as required by 115.34?	yes

115.71 (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

115.71 (d)	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 prosecution?	no

115.71 (e)	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 inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes

115.71 (f)	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

115.71 (g)	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

115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes

115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes

115.71 (j)	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 agency does not provide a basis for terminating an investigation?	yes

115.71 (l)	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 115.21(a).)	na

115.72 (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

115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate'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 inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na

115.73 (c)	Reporting to inmates	
	Following a inmate'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 inmate's unit?	yes
	Following a inmate'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 inmate'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 inmate'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

115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, 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 an inmate's allegation that he or she has been sexually abused by another inmate, 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

115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes

115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes

115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes

115.76 (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

115.76 (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

115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	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

115.77 (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 take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes

115.78 (a)	Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes

115.78 (b)	Disciplinary sanctions for inmates	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes

115.78 (c)	Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes

115.78 (d)	Disciplinary sanctions for inmates	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	no

115.78 (e)	Disciplinary sanctions for inmates	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes

115.78 (f)	Disciplinary sanctions for inmates	
	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

115.78 (g)	Disciplinary sanctions for inmates	
	Does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes

115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?	yes

115.81 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na

115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?	yes

115.81 (d)	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

115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes

115.82 (a)	Access to emergency medical and mental health services	
	Do inmate 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

115.82 (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 security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes

115.82 (c)	Access to emergency medical and mental health services	
	Are inmate 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

115.82 (d)	Access to emergency medical and mental health services	
	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

115.83 (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 inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes

115.83 (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

115.83 (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

115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.)	yes

115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.83(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.)	yes

115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes

115.83 (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

115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na

115.86 (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

115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes

115.86 (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

115.86 (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
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	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 §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes

115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

115.87 (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

115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes

115.87 (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

115.87 (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

115.87 (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 inmates? (N/A if agency does not contract for the confinement of its inmates.)	na

115.87 (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.)	na

115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 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 § 115.87 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 § 115.87 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

115.88 (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

115.88 (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

115.88 (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 publication would present a clear and specific threat to the safety and security of a facility?	yes

115.89 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes

115.89 (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?	no

115.89 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes

115.89 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 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 three-year period starting on August 20, 2013, and during each three-year period thereafter, 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.? (N/A before August 20, 2016.)	no

115.401 (b)	Frequency and scope of audits	
	During each one-year period starting on August 20, 2013, 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?	no

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 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 within 90 days of issuance by auditor. The review period is for prior audits completed during the past three years PRECEDING THIS AGENCY AUDIT. In the case of single facility agencies, the auditor shall ensure that the facility's last audit report was published. 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 that there has never been a Final Audit Report issued.)	na