

# PREA Facility Audit Report: Final

**Name of Facility:** Franklin County Jail

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 08/11/2017

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"/>
<b>Auditor Full Name as Signed:</b> Lori Fadorick	<b>Date of Signature:</b> 08/11/2017

AUDITOR INFORMATION	
<b>Auditor name:</b>	Fadorick, Lori
<b>Address:</b>	
<b>Email:</b>	Lori.Fadorick@wvarj.org
<b>Telephone number:</b>	
<b>Start Date of On-Site Audit:</b>	05/23/2017
<b>End Date of On-Site Audit:</b>	05/24/2017

FACILITY INFORMATION	
<b>Facility name:</b>	Franklin County Jail
<b>Facility physical address:</b>	70 East Court Street, Rocky Mount, Virginia - 24151
<b>Facility Phone</b>	540-483-3020
<b>Facility mailing address:</b>	
<b>The facility is:</b>	<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
<b>Facility Type:</b>	<input type="radio"/> Prison <input checked="" type="radio"/> Jail

Primary Contact			
<b>Name:</b>	Megan Patterson Merchant	<b>Title:</b>	Medical/Accreditation
<b>Email Address:</b>	Megan.Patterson@franklincountyva.gov	<b>Telephone Number:</b>	<del>540-483-3020</del> (540) 482-6717

Warden/Superintendent			
<b>Name:</b>	Duane Amos	<b>Title:</b>	Captain
<b>Email Address:</b>	Duane.Amos@franklincountyva.gov	<b>Telephone Number:</b>	540-483-3022

Facility PREA Compliance Manager			
<b>Name:</b>	Mark Sweeney	<b>Email Address:</b>	Mark.Sweeney@franklincountyva.gov

Facility Health Service Administrator			
<b>Name:</b>	Charles Lane	<b>Title:</b>	MD, EMS Physician
<b>Email Address:</b>	Charles.Lane@franklincountyva.gov	<b>Telephone Number:</b>	<del>XXXXXXXXXX</del>

Facility Characteristics			
<b>Designed facility capacity:</b>	49		
<b>Current population of facility:</b>	57		
<b>Age Range</b>	Adults: 18-90	Youthful Residents:	
<b>Facility security level/inmate custody levels:</b>	Minimum and Maximum		
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	37		

AGENCY INFORMATION	
<b>Name of agency:</b>	Franklin County Sheriff's Department
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	70 East Court Street, Rocky Mount, Virginia - 24151
<b>Mailing Address:</b>	
<b>Telephone number:</b>	540-483-3020

Agency Chief Executive Officer Information:			
<b>Name:</b>		<b>Title:</b>	
<b>Email Address:</b>		<b>Telephone Number:</b>	

Agency-Wide PREA Coordinator Information			
<b>Name:</b>	Megan Merchant	<b>Email Address:</b>	megan.patterson@franklincountyva.gov



## 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.

The Franklin County Sheriff's Office contracted with Lori Fadorick, a U.S. Department of Justice Certified PREA Auditor, on April 5, 2017 to conduct a PREA Audit of the Franklin County Jail.

Audit notices were posted on April 5, 2017 in all inmate living areas, as well as public areas, including the lobby and visitation areas announcing the upcoming audit and containing the Auditor's contact information. Photographic evidence was submitted to the Auditor demonstrating the timely posting of the audit notices. Audit notices were present and observed at the time of the on-site audit. The facility was requested and agreed to keep all notices posted for four weeks following the on-site audit. As of the date of this report, this Auditor has not received any communication from an offender at the PREA Audit Post Office Box.

Approximately three weeks prior to the on-site review of the facility, the Auditor received notice that the Pre-Audit Questionnaire (PAQ) containing supporting documentation and policies was available on the online system for review. Prior to the on-site evaluation, the Auditor performed a comprehensive review of the agency policies, operational procedures, forms, training materials and other related supporting documentation submitted by the agency to demonstrate compliance with the standards. During and after this review, the Auditor had several follow-up conversations with the agency and made several requests for additional documentation. All requests for additional documentation were provided and reviewed by the Auditor either prior to the on-site portion of the audit or during the on-site portion of the audit.

The Prison Rape Elimination Act (PREA) on-site audit of the Franklin County Jail in Rocky Mount, Virginia was conducted on May 23-24, 2017 by Lori Fadorick, a U.S. Department of Justice Certified PREA Auditor for Adult Facilities from Salem, Virginia.

An entrance conference was conducted with the PREA Coordinator and Jail Lieutenant on the morning of May 23, 2017. Present were Auditor Lori Fadorick, Lieutenant Mark Sweeney, Jail Administrator and Deputy Megan Patterson, PREA Coordinator and Medical Officer. After a brief overview and opening remarks by the Auditor and staff, the discussion focused on the schedule for the audit and a review of the process. The Auditor asked if there were any questions regarding the on-site portion before proceeding.

Immediately following the entrance conference, the Auditor toured the facility escorted by Deputy Patterson, PREA Coordinator. The Auditor toured all areas of the Jail, including all the offender housing areas (Front Side, Back Side and Dorms), kitchen, laundry, medical area, and intake. After the completion of the physical plant review and tour, the Auditor began interviewing random and specialized staff, as well as reviewing additional documentation on site. The Auditor observed and spoke with staff during the shift on day one. On day two, the Auditor conducted additional specialized staff interviews and completed the random inmate interviews. There were no specialized inmate interviews conducted, as there were no inmates identified at the facility meeting those criteria. Final document and file review was

also conducted on day two, including training files. The exit conference was conducted at the end of the day on day two.

Throughout the facility tour, the Auditor spoke informally with both offenders and staff. Some of the informal questions asked of the offenders included their perception of the safety of the facility, information they had received at intake, if they knew the various reporting methods and whether or not they had seen the PREA orientation video. Some of the informal questions asked of staff included their perception of the safety of the facility, their awareness of the first responder duties and their awareness of the various reporting methods. The Auditor observed and made note of the video monitoring system and camera placement throughout the facility, including reviewing the monitors in the control room. During the review of the physical plant, the Auditor observed the facility layout, staff supervision of offenders, interaction between staff and offenders, shower and toilet areas, placement of PREA posters, observation of availability of PREA information on the kiosks located within the inmate housing areas, observation of communication in housing areas and holding cells, and search procedures. The Auditor noted that the facility had taken measures to ensure that inmates in the holding cells have privacy when using the shower and restrooms by putting up curtains. The Auditor had a discussion with PREA Coordinator and facility staff about how rounds were made in the dormitories. The Auditor suggested ways that the facility could enhance, not only security measures with regard to the rounds, but also enhance inmate safety measures. Additional cameras in the holding cells and dormitory living areas are recommended to enhance safety measures for both staff and offenders.

Formal personal interviews were conducted with facility staff, contractors, and offenders. The Auditor was provided private space to conduct the confidential interviews. All staff and offenders were made available in a timely manner. No staff or offenders refused to be interviewed when requested by the Auditors. Overall, a total of 11 staff were interviewed during the on-site review. Included in the interviews was random staff representing the shifts. The Auditor was provided a roster for the shift working each day the interviews were conducted, comprising 3 officers and a supervisor. The Auditor randomly selected 2 officers per shift to be interviewed, representing roughly one half of each shift. Specialty staff interviewed included the medical officer, Forensic Nurse, Investigator, intermediate level supervisors, staff who perform risk assessments, Human Resources/Professional Standards and intake staff. Since the facility is so small, many of the staff performs all these duties. Also interviewed were the Facility Administrator (Captain), The Jail Lieutenant and The PREA Coordinator. All staff interviews were conducted using the established DOJ interview protocols.

The Auditor reviewed a random sampling of staff training files to determine compliance with training standards and background check procedures. The PREA Coordinator explained the process for relaying the mandated PREA information to new hires, as well as the procedure for annual refresher training.

There were 59 offenders housed in the facility (all males) during the on-site review. The Auditor was provided an offender roster and randomly selected offenders from each housing area to be interviewed. A total of 6 offenders was interviewed representing roughly ten percent of the offender population. The facility did not identify any offenders that fell into the categories for specialized interviews (Limited English Speaking, LGBTI, Inmates Who Reported a Sexual Abuse, Inmates Who Disclosed Victimization). The facility does not hold Youthful Offenders, even if they are adjudicated as adults. Offender interviews were conducted using the established DOJ interview protocols. Offenders were also asked about their perceptions of the sexual safety of the facility and whether they felt the staff would take reported allegations seriously. The offenders felt that the facility staff took their sexual safety seriously and made PREA compliance a priority. The staff, including administrators, is well-respected by the offenders and

most all offenders interviewed indicated that the staff genuinely care about their safety and well-being. The offenders stated they felt they could go to any staff member to report an incident.

Random offender case files were reviewed to evaluate intake procedures, including screening and subsequent housing decisions, and verify offender PREA education. In addition, the intake and booking procedures were observed and intake screenings are conducted in private.

The Auditor verified the availability of SANE/SAFE services at Franklin Memorial Hospital. The Forensic Nurse on call, Stephanie Hodges, was interviewed by the Auditor. She indicated that there was a nurse on call 24/7 and a backup nurse available as well. She also stated that advocacy services are available to the inmates through Southside Survivor Response.

The Auditor was treated with great hospitality during the entirety of the visit and was given unimpeded access to all areas of the facility during the review. The Auditor conducted the exit conference on the evening of the second day, May 24, 2017. Present were Auditor Lori Fadorick, Lieutenant Mark Sweeney, Jail Administrator and Deputy Megan Patterson, PREA Coordinator and Medical Officer. The facility administration was incredibly open in the discussion of the PREA program at the facility and receptive to the feedback received from the Auditor. They immediately began preparations to implement the suggestions for enhancements recommended by the Auditor, as well as corrective action discussed with the PREA Coordinator.

## AUDIT FINDINGS

### Facility Characteristics:

The auditor's description of the audited facility should include details about the type of the facility, 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 Franklin County Jail has been in operation since 1938 and is operated by the Corrections Division of the Franklin County Sheriff's Office. The division is commanded by a Captain and a variety of Deputies of varying rank and responsibilities. There are approximately 20 full time personnel assigned to the Corrections Division, with an additional 3 full-time and 10 part-time personnel stationed in the Courthouse.

The Franklin County Jail is a local adult detention facility with an operational capacity of 49 beds per Virginia Department of Corrections. The facility currently has 56 bunks throughout the housing units, plus an additional 14 bunks in the temporary holding cells. The Jail only houses adult males, and does not hold youthful offenders or have housing for female offenders. The Jail was opened in 1938, with an addition of two dormitories and offices in the early 1980s. The facility has had only minor upgrades to the physical plant since that time. Currently, the Jail houses both unsentenced and sentenced local and state inmates. The average daily population fluctuates daily with the arrest and release of inmates and the average daily population hovers around 60. Generally, the inmate to officer ratio is approximately 15:1.

The Jail houses an average of 60 inmates, both pretrial and sentenced county inmates. These are persons arrested in Franklin County and the Town of Rocky Mount. The Franklin County Jail is part of the Western Virginia Regional Jail Authority and has a service agreement with the Western Virginia Regional Jail to hold their inmates.

The revenue sources of the Jail are derived from local and state detention agreements/contract, inmate telephone commissions, and inmate commissary sales.

The Jail provides services including: booking/intake processing, classification, general population (celled and dormitory housing) for male inmates, inmate work programs (both inside and outside community workforce), work release, self-operated heat and serve food service, laundry facility, basic medical care through the medical officer and access to off-site services if needed, legal reference access, rehabilitative programs such as faith-based and substance abuse treatment, as well as leisure activities such as recreation (indoor and fresh air), library, non-video visitation, television and inmate commissary.

Operationally, the Jail operates on an intermittent surveillance model, with deputies making rounds twice an hour as required by policy. A large portion of the inmate population are Trustee workers and thus are directly supervised by their Trustee Supervisor while on the job site during working hours. The staff are permitted and expected to interact with the population during the time that inmates are out and/or permitted in the dayrooms. Overall, the atmosphere and culture is one that encourages mutually respectful communication between staff and inmate. The inmates are observed on a twice hourly basis by the staff and provided basic necessities, as well as access to the facility's services as appropriate.

The booking/intake processing area contains two single occupancy cells, monitored by camera. There is a modesty square covering the toilet area on the screen for these cells.

Classification of inmates upon commitment is conducted in the intake/booking area. Except in rare cases, only one inmate is booked at a time. Therefore a private setting is available to conduct medical, mental health and PREA risk assessments, as well as classification. Intake officers complete conduct classification screenings at booking and these are reviewed by the on-duty supervisor.

The food service area is located separately from the inmate housing area. The food service preparation area contained both dry and refrigerated food service areas, open food preparation areas, and the staff restrooms are separated from the inmate restroom areas. In evaluating the area for safety with regard to the PREA standards, the facility recently moved things around in the kitchen in order to open up the space and remove any potential barriers or blind spots. Food storage areas are provided with adequate lighting.

The Laundry room is located downstairs off the main hallway. This area is manned by inmate trustys and access to the laundry is controlled by staff. The laundry operates during the daylight hours. The room is small and free from excessive obstruction. The facility just recently added two cameras in the laundry area to correct blind spots. This was done prior to the on-site portion of the audit. The area is well lit, and covered by CCTV viewed from inside the officer control station that is staffed 24 hours per day.

The Franklin County Jail does not have medical or mental health services on-site. There is a Medical Deputy, who is an EMT that evaluates any emergent medical needs. Any inmate housed at the Franklin County Jail needing medical services beyond this scope will be transferred to the Free Clinic for care, or the hospital if necessary. Inmates received at the jail that have medical needs that cannot be handled at the Franklin County Jail will be transferred to the Regional Jail. The medical section is a private, locked office located within the inmate housing area. The medical deputy works daylight hours Monday through Friday.

Each of the housing units and intake processing has areas designed for private searches, toilet facilities and showering facilities.

Overall, the Jail was sanitary and orderly. The atmosphere was relaxed and without tension or frustration on behalf of the staff or inmates. The interactions between the staff and inmates were generally positive and mutually respectful. The administration and staff members were friendly, helpful and highly professional.

## 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.

<b>Number of standards exceeded:</b>	0
<b>Number of standards met:</b>	45
<b>Number of standards not met:</b>	0

In the past 12 months, the Franklin County Jail reported no allegations of sexual assault, harassment or abuse by offenders at the facility. On site, the Auditor confirmed with the administration and PREA Coordinator that there had been no additional allegations since the submission of the PAQ.

The agency's dedication to compliance with the PREA standards and this process have been demonstrated to the Auditor through their frequency of communication, timeliness of their submission of the Pre-Audit Questionnaire and all requested follow-up documentation, being open to suggestions for improvement and immediately implementing the considerations for enhancement suggested by the Auditors, and the corrective action discussed with the PREA Coordinator.

One of the facility's key accomplishments is the recent expansion of their CCTV system by the addition of multiple cameras that helped to eliminate several blind spots. The addition of more cameras, as well as several requested upgrades to the physical plant, including new and increased lighting, is slated for the coming months.

Interviews conducted with the offenders reflected that they are aware of the facility's zero tolerance policy and understand the protections afforded to them under the PREA standards. They are given information to review at the time of intake, which includes multiple ways to report sexual abuse and harassment, as well as how to protect themselves. This information is also available on the kiosk system in all the offender housing areas. Laminated informational posters are present and were observed in the housing areas containing this information as well. Within 10 days of intake, offenders are provided more comprehensive education on PREA through the use of the PREA orientation video. This is currently being done via a DVD player being hooked to the dayroom TVs and the video being shown. Plans are in place to put the video on the kiosk system. Through the Auditor offender interviews, the Agency has demonstrated that offenders have a general awareness and understanding of PREA. However, they could benefit from more a more enhanced education program. Options were discussed with the PREA Coordinator and administration regarding ways to increase the offenders' access to PREA education, including making the information easier to access from the main menu on the kiosk. Offenders indicated that they understand the various ways they can report sexual assault or harassment and were able to articulate how and to whom they would report. Offenders consistently indicated that they felt safe in the facility and felt that the staff would immediately respond and take any reported allegation seriously. This was a very positive indicator to the Auditor of a sexually safe environment and a staff culture that takes PREA compliance seriously.

Staff interviews indicated that the staff have been trained and understand the meaning of the agency's zero tolerance policy. The staff was also able to articulate the steps to take if they were the first responder to a reported allegation of sexual assault. It was clear based on interviews with staff, as well as a review of training records and interviews with the training officers that the staff have a basic knowledge and understanding of PREA, as well as their roles and obligations. Overall, most staff are also aware of the variety of reporting avenues for inmates, as well as staff. While it's evident that the staff is being trained, the training mechanisms don't seem to be wholly effective and the staff could benefit from enhanced PREA training, particularly in the area of LGBTI populations. At the time of the on-site audit, the PREA Coordinator was working on the lesson plan for the annual refresher training and a plan to train the staff that included more classroom style training that would afford the staff the opportunity to ask questions and discuss amongst themselves. Staff indicated that they felt the facility was a safe place and that the administration took PREA seriously and made sure it was a priority.

After reviewing all relevant information submitted by the facility, as well as additional documentation reviewed on site, and conducting the on-site review and offender and staff interviews, the Auditor found that the administration have made PREA compliance a priority for the facility. Discussions with administrators reinforced their commitment and dedication to this process. They were very open to suggestions for improvement, even if the process they have in place met the standard. It is evident to the Auditor through staff and offender interviews, as well as direct observation that the culture at the facility is one of mutual respect between staff and inmates and there is a commitment to the sexual safety of the offenders and staff. As a result of their efforts and commitment, the facility has achieved full compliance with the PREA Standards for Adult Prisons and Jails.

The final status of the standards that were exceeded, met, not met, or not applicable is shown below. The facility must achieve compliance in all areas and subsections of the standard to reach full compliance with that standard. An explanation of the findings related to each standard are provided and detailed in each standard. The Pre-Audit Questionnaire, documents submitted during the pre-audit period, additional requested documentation, interviews, observations and additional documents reviewed on site all verified that practices and procedures at the Franklin County Jail are consistent with the agency policy and are in compliance with the PREA standards. There was no interim report issued as the corrective action that was required was completed within 60 days.

#### PREA Standards Compliance Overview - Initial Report

Number of Standards Exceeded: 0

Number of Standards Met: 37

Number of Standards Not Met: 4

§115.13

§115.17

§115.41

§115.65

Number of Standards Not Applicable: 2

§115.14

§115.66

Total Standards: 43

Update since the on-site audit: Corrective actions taken to achieve full compliance:

During the on-site audit there were four standards identified that were in non-compliance at the Franklin County Jail. As a result, a corrective action period not to exceed 180 days began on May 25, 2017. The Auditor discussed the standards not in compliance with the PREA Coordinator and Jail Administration at the time of the on-site audit. The Auditor recommended corrective actions for the facility to achieve full compliance. The PREA Coordinator and Jail Administration agreed with the recommendations and immediately began work on the corrections of the standards found in non-compliance. FCSO completed the required corrective actions requested by the Auditor to bring the facility into full compliance with the PREA standards. Initial documentation of the corrective action was received by the Auditor on June 15, 2017. Additional evidence of corrective action taken was received by the Auditor on June 19th and 21st and July 12th and 17th. The Auditor reviewed the submitted documentation to determine if full compliance was achieved. In some cases, the Auditor requested clarification or additional revisions or documentation through emails and phone calls to the PREA Coordinator. FCSO staff complied with all requests from the Auditor. A summary of the 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 FCSO has achieved full compliance with the PREA standards as of the date of this report. As corrective action was completed within less than 60 days, no interim report was issued.

PREA Standards Compliance Overview - Final Report

Number of Standards Exceeded: 0

Number of Standards Met: 43

Number of Standards Not Met: 0

Number of Standards Not Applicable: 2

§115.14

§115.66

Total Standards: 43

## 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.

<b>115.11</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The facility has a comprehensive PREA policy which covers all elements of the standard. The definitions contained in the policy are consistent and in compliance with PREA definitions. The policy clearly details the facility’s overall approach to preventing, detecting and responding to sexual abuse and harassment. The zero tolerance mandate is understood by both staff and inmates. The culture of “zero tolerance” is apparent throughout the facility as evidenced by informational posters, information on the kiosk, and interactions and interviews with both offenders and staff. The zero tolerance mandate is clearly taken seriously by the staff at the facility and this is reflected in the offender interviews.</p> <p>The FCSO has designated Deputy Megan Patterson as the PREA Coordinator. Deputy Patterson is the Medical Officer and reports directly to Lieutenant Sweeney, the Jail Lieutenant. She reports that she has sufficient time and by virtue of his position, the authority to develop, implement and oversee the facility’s efforts to comply with PREA standards. It is evident to the Auditor that she and the Lieutenant work closely to ensure the facility’s compliance efforts and the sexual safety of the offenders. There is an open line of communication between all levels of staff at the facility and Deputy Patterson is personally involved in the implementation efforts, as well as handling and reviewing individual offender issues.</p> <p>Corrective Action: None</p>

<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The FCSO, as a member of the Western Virginia Regional Jail Authority contracts with the Western Virginia Regional Jail to hold their inmates as part of the Service Agreement in place for the Authority. This agreement was established in 2008. There has not been an updated contract, however, the Western Virginia Regional Jail is certified PREA compliant as of October 2014.</p>

<b>115.13</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The facility does not currently have a written staffing analysis/plan. This was discussed with the PREA Coordinator and corrective action is needed. While staffing needs are continually addressed and discussed, there is no written plan. The agency reports that no deviations from the minimum staffing occurred. The facility has a camera surveillance system comprised of monitors located in the control room. The facility just recently added and updated the surveillance system, to include adding cameras in places identified as higher risk areas.</p> <p>The agency reports that they conduct unannounced rounds on all shifts and a policy exists that prohibits staff from altering other staff of the rounds. Agency policy requires that supervisors will conduct and document unannounced rounds each shift to identify and deter sexual abuse and harassment. The Auditor reviewed log books indicating rounds were made. It is clear through observation that supervisors and administrators are conducting unannounced rounds and that the offenders are comfortable approaching and speaking with them. Interviews with shift supervisors, as well as line staff indicate that the rounds are unannounced and random and that there's no way for the staff to alert each other when the supervisors are coming through because there is no pattern or routine to the rounds. In addition, the supervisors are working supervisors on the shift, which means that they are continually in the jail.</p> <p>Corrective Action: The facility should build upon the policy that they have with regard to staffing to incorporate all elements of the standards. The final staffing plan will need to be provided to the Auditor.</p> <p>Verification of Corrective Action Since the Audit: The Auditor received supplemental documentation on July 11, 2017 to demonstrate corrective actions taken by FCSO with regard to this standard. The FCSO created a Staffing Plan document to go along with their policy that was incredibly detailed and thorough and included all required elements of the standard. The staffing plan addresses staffing in each housing area, staffing ratios, programming, facility layout, composition of the inmate population, applicable regulations and other relevant factors. Video monitoring is referenced in the staffing plan. In developing the staffing plan, they had discussed and considered the PREA standards, particularly with regard to staffing ratios, minimum staffing requirements, and shift assignments.</p>

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	N/A



115.15	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The facility does not perform cross-gender strip searches. Females deputies are always available to perform searches for female inmates, however they are only held for a short period of time before being transported to the regional jail. The facility has done a good job to make facility improvements to ensure that inmates can shower and perform bodily functions in private. There have been no transgender inmates held, but staff are aware of how to perform searches of transgender inmates and cross-gender pat-down searches.</p> <p>The FCSO does not conduct cross-gender strip searches or cross-gender visual body cavity searches except when performed by medical practitioners. There is no exigent circumstance exception in the policy. Interviews with staff indicate operational practice is consistent with this policy. The facility reports and verified through staff interviews that no cross-gender strip searches or visual body cavity exams have occurred.</p> <p>The FCSO does not conduct cross-gender pat down searches. There is not a prohibition against female officers patting down male offenders, however, this does not occur absent exigent circumstances. The facility primarily holds male offenders. The facility has no designated female housing areas and if received, are only held for a short period of time before being sent to the Regional Jail. There is usually at least one female officer assigned and on duty for each shift. During the regular, daytime hours, there are also daylight female officers and supervisory staff available if needed. During the evening and nighttime hours, female patrol officers can be utilized if need be for searching. Female offenders' access to programming and out of cell opportunities are not limited due to a lack of female staff. Interviews with staff and offenders confirm that cross gender pat down searches do not occur.</p> <p>The facility reports and verified through interviews that no cross-gender strip searches, pat searches or visual body cavity searches have occurred.</p> <p>Facility policy states that staff of the opposite gender shall announce their presence when entering an inmate housing unit. Offenders indicated that announcements are routinely made when opposite gender staff enter the housing units. Staff interviews also indicate the offenders' privacy from being viewed by opposite gender staff is protected. Staff do not enter the units if there are offenders in the shower or toilet areas. Cameras are placed appropriately so that shower and toilet areas are not in view. In the intake holding cells, which are monitored by camera, that area is blacked out on the monitors, so that the offenders cannot be viewed by officers monitoring the cameras.</p> <p>FCSO policy prohibits searching or physically examining a transgender or intersex offender for the sole purpose of determining the offender's genital status. During interviews officers were able to articulate that they could determine this information other ways, including asking the offender. The facility reported that they had not received any transgender inmates in the last year and this was verified through staff interviews.</p>

Staff indicated that they are trained to do cross-gender searches at the academy. While interviews indicate that the officers have a basic understanding of how to conduct cross-gender searches and searches of transgender and intersex offenders, the staff could benefit from additional training in this area. The PREA Coordinator indicated that they were working on the lesson plan for the annual refresher training and planned to include additional resources from the PREA Resource Center. The FCSO staff report they have not received or housed any transgender inmates in several years.

Corrective Action: None

<b>115.16</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The FCSO takes appropriate steps to ensure that offenders with disabilities, including those who are deaf, blind or have intellectual limitations have an equal opportunity to participate and benefit from all aspects of the facility's efforts to prevent, detect and respond to sexual abuse and harassment. Offenders determined to have disabilities will have accommodations made to ensure that materials are received in a format or through a method that ensures effective communication. Inmates that have any sort of disability</p> <p>Staff indicated that they did not currently have any offenders with disabilities or special needs that would require accommodations to have access to the PREA information and protections.</p> <p>Policy articulates that offenders who are limited English proficient have access all aspects of the facility's efforts to prevent, detect and respond to sexual abuse and harassment, including providing interpreters. This service is provided by Language Line, a telephone interpreting service. Auditor observed the informational sheets regarding the availability of the Language Line Service at several duty posts. The policy prohibits the use of inmate interpreters except in instances where a significant delay could compromise the offender's safety. Interviews with staff indicate that offenders are not and would not be used as interpreters.</p> <p>Corrective Action: None</p>

115.17	<b>Hiring and promotion decisions</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 373 360">Findings:</p> <p data-bbox="252 371 1461 528">The FCSO policy is written consistent with the standard. The Auditor reviewed the interview process and questions with Captain Young, Professional Standards, and found that they are not asking these questions during the interview process to determine if they are hiring anyone who has engaged in prohibited conduct.</p> <p data-bbox="252 584 1471 831">The policy indicates that the FCSO will consider any instances of sexual harassment in determining whether to hire or promote anyone, or enlist the services of contractors who may have contact with inmates. Captain Young stated that instances of sexual harassment would definitely be a factor when making decisions about hiring and promotion. Every employee and contractor undergoes a background check and is not offered employment if there is disqualifying information discovered.</p> <p data-bbox="252 887 1471 1223">Consistent with FCSO policy, all employees and contractors must have a criminal background records check prior to employment. Professional Standards Staff at the FCSO complete criminal background checks for all prospective applicants prior to them being offered employment. Captain Young stated that if a prospective applicant previously worked at another correctional institutional, they make every effort to contact the facility for information on the employee's work history and any potential issues, including allegations of sexual assault or harassment, including resignation during a pending investigation. He stated that most of the surrounding agencies were good about sharing information with each other.</p> <p data-bbox="252 1267 1477 1469">The FCSO completes background checks every five years for all current employees and contract staff as indicated in the policy. The Auditor reviewed these background checks, which were completed by Deputy Patterson. Policy indicates and staff interviews confirm that an employee engaging in any type of misconduct such as listed in the standard would not be retained.</p> <p data-bbox="252 1525 1426 1648">The FCSO does not currently ask applicants directly about misconduct as described in the standard. Auditor discussed this with the PREA Coordinator and Captain Young during the audit.</p> <p data-bbox="252 1693 1465 1861">In accordance with the standard, FCSO policy stipulates that material omissions regarding such conduct, or the provision of materially false information shall be grounds for termination. Staff interviews verified that the FCSO would and has terminated employees for engaging in inappropriate behavior with inmates, upon learning of such misconduct.</p> <p data-bbox="252 1906 1471 2152">FCSO policy indicates that the facility shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer and a signed release of information. As noted, Captain Young stated that most surrounding agencies would share information out of professional courtesy. He stated she would share information upon request from another facility regarding a former employee if it was a substantiated incident.</p>

**Corrective Action:**

FCSO needs to enhance its hiring and promotion process as well as its contractor hiring procedures by ensuring the necessary questions are asked of all applicants, employees and contractors to uncover the prohibited conduct detailed in this standard. These questions must be asked of applicants for new hiring, promotions internally and for all contractors. The new PREA self-disclosure form will accomplish this and the Auditor received documentation on June 19, 2017 that the form has been implemented.

115.18	Upgrades to facilities and technologies
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>Findings:</b> The FCSO has not made any substantial expansion or modification of their existing facilities.</p> <p>The FCSO analyzed and addressed any vulnerabilities to ensure the safety of the offenders. A proposal to add new cameras to reduce blind spots was approved. The FCSO obtained approval for four additional cameras to help increase the safety of potentially vulnerable areas. This upgrade and the installation of new equipment was completed at the time of the on-site review.</p> <p><b>Corrective Action:</b> None</p>

115.21	<b>Evidence protocol and forensic medical examinations</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 373 360">Findings:</p> <p data-bbox="252 371 1474 663">The FCSO is responsible for both administrative and criminal investigations. The facility follows a uniform protocol for investigating allegations of sexual abuse that maximizes the possibility of collecting usable evidence and trains facility staff who may be first responders in this protocol. The evidence protocol is specified in policy and described and confirmed by the Investigator, who is very experienced and able to fully articulate investigative procedures for a sexual assault in a jail setting. Interviews with staff indicate that they are trained and familiar with the evidence protocol and what to do if they are the first responder to a sexual assault.</p> <p data-bbox="252 707 831 741">The FCSO does not hold youthful offenders.</p> <p data-bbox="252 797 1474 1211">FCSO policy stipulates that all victims of sexual abuse shall be offered a forensic medical exam, without financial cost. There is an on-call Clinical Forensic Nurse through Carilion Franklin Memorial Hospital that is notified in such instances. These exams would be performed off-site at Carilion Franklin Memorial Hospital. In the event the on-call Forensic Nurse is not available, the exam would be performed by SANE/SAFE employees at the hospital. The availability of these services was confirmed by the Auditor with the on-call forensic nurse, Stephanie Hodges. She indicated they always had a SANE/SAFE nurse available 24/7 and there would be no charge to the victim for this exam. The FCSO reported on the PAQ there had been no forensic exams conducted. This was confirmed by jail staff and the forensic nurse.</p> <p data-bbox="252 1267 1474 1391">A local rape crisis center, Southside Survivor Response Center is available to serve as a victim advocate to victims of sexual assault at the FCSO. The FCSO has an MOU with the agency, and communication with the agency director, which was provided to the Auditor for review.</p> <p data-bbox="252 1447 1474 1603">As stipulated in the MOU, Southside Survivor Response Center is available to provide an advocate to accompany and support the victim through the forensic exam process, if requested and shall provide any needed or requested emotional support or crisis intervention services. FCSO policy stipulates these services are available.</p> <p data-bbox="252 1659 560 1693">Corrective Action: None</p>

115.22	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The FCSO policy is written in accordance with the standard. The PREA Coordinator, supervisors and Investigators work very closely together to ensure that all allegations of sexual abuse and harassment are investigated promptly and thoroughly. If an offender alleges a sexual assault or sexual harassment has taken place, the staff member will notify the supervisor, who will take the initial report and refer it to one of the investigators for further action if substantiated. The Investigator coordinates with the PREA coordinator and Jail supervisors to determine the course of action. The Auditor interviewed jail staff and investigators and confirmed that all allegations are investigated. There have been no allegations of sexual assault or harassment in this reporting period.</p> <p>The policy is posted on the FCSO website. The FCSO investigators conduct all criminal investigations at the facility.</p> <p>Corrective Action: None</p>

<b>115.31</b>	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The FCSO policy is written in accordance with the standard. The training curriculum was reviewed by the Auditor and contains all required elements of the standard. This training was provided to current employees in person by the facility staff on multiple dates. New employees are provided the training in person, during orientation. The training is specific to both male and female offenders.</p> <p>All employees receive annual refresher training on PREA. This training had been scheduled and is upcoming for this calendar year.</p> <p>The Auditor reviewed training files and signature sheets where employees signed and acknowledged that they had received and understood the training.</p> <p>Interviews with staff revealed that they are clear on the zero tolerance policy and their duties as first responders. While they generally remember the training, they had difficulty recalling some of the more specific information contained in the curriculum. While it's clear the employees are being trained, as an enhancement to the program, it is recommended that additional training be provided to the staff. Discussions with facility supervisors and the PREA Coordinator included ways to use other training method and utilize training resources on the PREA Resource Center website.</p> <p>Corrective Action: None</p>

<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The FCSO policy is written in accordance with the standard. The training curriculum was reviewed by the Auditor and contains all required elements of the standard. This training is provided to contract employees and volunteers in person, prior to assuming their duties. The PREA Coordinator briefly reviewed with the Auditor a typical training session. All volunteers and contract staff are trained, including work supervisors in the community.</p> <p>The Auditor reviewed training files to verify training and signature sheets where contract employees and volunteers signed and acknowledged that they had received and understood the training.</p> <p>Interviews with contract staff (Kitchen) revealed that they are clear on the zero tolerance policy and their duty to report, as well as how and to whom to report incidents. They also report understanding their responsibilities to try to preserve evidence by telling the offender not to eat, brush their teeth, etc.</p> <p>Corrective Action: None</p>

115.33	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Findings:</p> <p>The policy is written in accordance with the standard. In accordance with policy, offenders will receive a Sexual Assault Awareness and Prevention in the Franklin County Jail” brochure at intake. This form, along with the inmate handbook and informal posters in intake provides offenders with information regarding sexual abuse and assault, the agency’s zero tolerance policy and how to report incidents of sexual abuse or harassment. The inmate handbook is available in paper format, as well as all the kiosks located in the offender housing areas.</p> <p>The comprehensive education is accomplished through the use of the PREA orientation video on the PREA Resource Center website. The video is shown via video on a DVD in the offender housing areas within ten days of arrival. The inmates sign an acknowledgement form, which is kept in the inmate record to verify receipt of the training. Offender interviews indicated that they were receiving the training.</p> <p>All current offenders have received PREA training. Offender interviews indicate that they remember receiving information upon arrival and viewing the orientation video. While it’s clear that the offenders are being trained and they have a general awareness of PREA information and how to report, they could benefit from an enhanced education program. Options were discussed with facility staff to increase access to PREA information for offenders, including making it easier to access on the kiosk. This was accomplished shortly after the on-site audit.</p> <p>As required by the standard, policy provides for education in formats accessible to all inmates. There are Spanish versions all materials, as well as a Spanish translator on call. The Language Line service is available for languages needed other than Spanish. For offenders that are visually impaired, a staff member would read the information to the offender. The video also has printed subtitles for the hearing impaired. Staff would assist any other disabled or impaired inmates that needed assistance, including intellectually limited inmates.</p> <p>Information in multiple formats was available throughout the facility. The Auditors observed PREA informational posters in all offender housing areas, intake, and public areas. The inmate handbook is available in electronic format on the kiosks in all offender housing areas, as well the orientation video.</p> <p>Corrective Action: None</p>

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>FCSO policy is written in accordance with the standard. FCSO investigators conduct both administrative and criminal investigations. There are two investigators for FCSO, both of whom have had specialized training in conducting sexual assault investigations in confinement settings. The Auditor was provided a copy of the training certificate for both investigators.</p> <p>The training included all mandated aspects of the standard, including Miranda and Garrity. During an interview with Investigator Sandra Ingram, she was able to articulate all aspects of the training received and had a thorough knowledge of the training and investigative procedures.</p> <p>Corrective Action: None</p>

<b>115.35</b>	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>FCSO policy is written in accordance with the standard. There are no medical or mental health providers working at the facility. Inmates needing medical care more than can be provided by the medical officer are transported to the community free clinic. The nurse working at the free clinic, as the primary health care provider for inmates at the facility has had training regarding responsibilities with regard to PREA, how to respond and how to detect signs and symptoms of sexual abuse. Auditor reviewed the curriculum and it covers all mandated aspects of the standard. Auditor was provided documentation of completion of training for the clinic nurse. Inmates at FCSO that may have medical needs or medical conditions that need monitoring are transferred to the regional jail.</p> <p>Forensic medical exams are conducted at Franklin Memorial Hospital.</p> <p>All contract and volunteer staff receive training on PREA mandated by FCSO policy and standard 115.32. The Medical Officer, Deputy Patterson, has also had additional training with respect to PREA.</p> <p>Corrective Action: None</p>

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The FCSO policy is written in accordance with the standard. All offenders received at the FCSO are assessed for risk to themselves or others upon arrival. It is rare that this screening does not occur within a few hours of arrival, and offenders are processed quickly after arriving. Interviews with intake staff and those responsible for completing the risk screening report that even on a busy day, offenders are processed within a few hours.</p> <p>The screenings are completed using an objective screening instrument. Upon initial review, the screening instrument was missing a couple of components of the standard. This was discussed with the PREA Coordinator, who indicated she would add the missing components. The screenings are reviewed and further action is taken if warranted. Risk levels are also reviewed and reassessed based upon any new information received that would affect the inmate's risk of sexual victimization or abusiveness. Action is taken as required in these instances. A review of random offender files indicates that the assessments are being completed consistently for each inmate that arrives. Offender interviews indicate that risk assessment screenings are being completed.</p> <p>The PREA Coordinator and Intake Staff both indicated that offenders would not be disciplined for refusing to answer risk assessment questions and that the only consequence would be a potential delay in their processing.</p> <p>The screening forms are completed electronically and are accessible only by authorized staff upon individual login to the system.</p> <p>Corrective Action: The screening instrument should be revised to include all required elements of the standard. The screening instrument is thorough, however the wording needs to be revised on several questions to ensure the screening is capturing all the required information, including whether the inmate has prior convictions for sex offenses and previous sexual victimization. Auditor received documentation from the PREA Coordinator on June 20, 2017 that the screening instrument had been revised and implemented.</p>

<b>115.42</b>	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>FCSO policy is written in accordance with the standard. Interviews with Intake Staff, Supervisors and the PREA Coordinator, who approve the screening forms and random staff indicate that information obtained on the screening form is used to make decisions on housing and programming. These determinations are made on a case by case basis based upon the results of the risk assessment.</p> <p>Interviews with facility staff indicate that placement of any transgender or intersex offenders would be made on a case by case basis. The PREA Coordinator and staff report that the FCSO has not housed a transgender or intersex offender in several years.</p> <p>FCSO policy stipulates that placement and programming assignments for transgender inmates will be reassessed at least twice a year and a transgender inmate's and a transgender inmate's views with respect to his or her safety will be given serious consideration. FCSO policy allows for transgender inmates to shower separately. Interviews with staff corroborate these practices would be enforced if a transgender offender were received.</p> <p>LGBTI offenders are not placed in dedicated housing areas. Interviews with staff confirm this practice does not occur. There were no offenders identified as gay in the facility population at the time of the on-site audit.</p> <p>Corrective Action: None</p>

<b>115.43</b>	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The FCSO reports that there were no inmates identified at risk of sexual victimization who were held in involuntary segregated housing in the last 12 months. FCSO policies are written in accordance with the standard and cover all mandated stipulations. Interviews with staff indicate they would not involuntarily place an offender at risk of sexual victimization in segregated housing except as a last resort when all other alternatives had been considered. There have been no instances that required action with regard to this standard. As FCSO does not have segregated housing, inmates identified as high-risk for sexual victimization would be transferred to the Regional Jail.</p> <p>Corrective Action: None</p>



115.51	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>FCSO policy is written in accordance with the standard. There are multiple internal ways for offenders to privately report PREA related incidents, including verbally to any staff member, a written note submitted to staff, anonymous reports, and third-party reports. This information is received by offenders at intake, contained in the inmate handbook and on informational posters in all offender housing areas and intake. Offender interviews revealed that the offenders would feel comfortable approaching and reporting to any staff member. They feel that that the staff at the FCSO genuinely care and would take any report seriously and act immediately. Offenders felt that staff would ensure their safety. Staff interviews revealed that they are aware of their responsibilities with regard to reporting and would accept and act on any information received immediately. Information on how to report on behalf of an inmate is listed on the agency website.</p> <p>Offenders also have the ability to report directly to the Commonwealth Attorneys office. This information and the phone number, which is a free call, is posted in the offender housing areas. The FCSO is in the process of establishing a hotline that offenders have access to through the Southside Survivor Response Center. Several offenders mentioned these as potential reporting methods, indicating the offenders are aware of this information. There have been no inmates held solely for civil immigration purposes.</p> <p>Staff may privately report sexual abuse or harassment of inmates either verbally or in writing to their supervisors, or jail administrators directly. Staff interviews revealed that they are aware they can go directly to facility administration to report sexual abuse and harassment of inmates.</p> <p>Corrective Action: None</p>

<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>Administrative procedures are in place to address FCSO grievances regarding sexual abuse and harassment, therefore the FCSO is not exempt from this standard. The policies are thorough and written in accordance with the standard, addressing all required aspects. FCSO reports in the PAQ there have been no grievances filed within the past 12 months alleging sexual abuse. Interviews with the staff and the PREA Coordinator confirm the information on the PAQ. There have been no instances that required action with regard to this standard.</p> <p>Corrective Action: None</p>

<b>115.53</b>	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>FCSO policy is written in accordance with the standard. The facility provides inmates with access to outside victim advocates for emotional support services related to sexual abuse by providing mailing addresses and telephone numbers, including toll-free hotline numbers for rape crisis organizations. FCSO ensures reasonable communication between inmates and these organizations in as confidential a manner as possible. Interviews with inmates indicate they are aware of these services. The facility informs inmates, prior to giving them access, the extent to which the communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.</p> <p>At the time of the onsite audit, FCSO had entered into an MOU with Southside Survivor Response Center to provide victim advocate services. The auditor reviewed email communication between the Director of the agency and the PREA Coordinator.</p> <p>Corrective Action: None</p>

<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>FCSO policy is written in accordance with the standard. The website contains information on how to make a report on behalf of an offender. Offenders are provided this information and offender interviews indicate that they are aware that family or friends can call or write and report an incident of sexual abuse on their behalf. Staff interviews reveal that they are aware of their obligation to accept and immediately act on any third-party reports received.</p> <p>Corrective Action: None</p>

<b>115.61</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>FCSO policy is written in accordance with the standard. Interviews with staff and supervisors indicate they are very clear with regard to their duties and responsibilities with regard to reporting PREA related information. They understand the need to keep the information limited to those that need to know to preserve the integrity of the investigation. There are no medical and mental health staff at the facility, however policy dictate that inmates will be made aware of their mandatory reporting requirements and will comply with the mandate to disclose the limits of their confidentiality.</p> <p>All allegations of sexual abuse and harassment will be reported to the on-duty supervisor. The supervisor initiates a report, and this report is forwarded to the PREA Coordinator and Investigative staff for further action. In addition, the facility administration is notified through the chain of command.</p> <p>Corrective Action: None</p>

<b>115.62</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>FCSO policy is written in compliance with the standard. Interviews with staff indicate they are very clear about their duty to act immediately if an offender is at risk of imminent sexual abuse. Offender interviews revealed that they felt the staff would ensure their safety. FCSO reports in the PAQ that there have been no determinations made that an offender was at substantial risk of imminent sexual abuse. Interviews with staff confirm this. There have been no incidents that required action with regard to this standard.</p> <p>Corrective Action: None</p>

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency's policy is written in accordance with the standard. During this review period, there have been no instances where sexual abuse as reported that needed to be reported to another facility. Interviews with the Jail Lieutenant, PREA Coordinator and facility investigator confirmed their understanding of their affirmative requirement to report allegations in accordance with the standard. Further, interviews with the staff, both formal and informal, revealed that there is a universal understanding and commitment to report any allegations of sexual abuse or harassment, which increases the probability that abuse will be detected, reported and investigated.</p> <p>Corrective Action: None</p>

<b>115.64</b>	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency's policy is written in accordance with the standard. There have not been any reported instances of sexual abuse during this review period. Interviews with facility staff, including supervisors, first line staff and contract staff, demonstrated the facility's commitment to knowledge of this standard and their responsibilities as first responders. The staff are clear as to their responsibilities as first responders to incidents of sexual assault or abuse and were able to articulate the steps to take as outlined in the policy and standard.</p> <p>Corrective Action: None</p>

<b>115.65</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>FCSO has the beginnings of a written coordinated facility plan to address actions in response to an incident of sexual abuse among facility staff, including first responders, supervisory staff, investigative staff, facility administrators and medical and mental health staff outside the facility. Interviews with multiple staff indicate that they understand their duties in responding to allegations of sexual assault. The FCSO plans to develop a flowchart that is a quick reference and good visual aid to assist staff in understanding their role.</p> <p>Corrective Action:</p> <p>FCSO must finalize its written institutional plan and flowchart to reflect a comprehensive and inclusive response protocol. The finalized plan and any documents that are incorporated into or with the plan must be resubmitted to the Auditor. This documentation and proof of implementation was provided to the auditor on July 12, 2017.</p>

<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	This standard is not applicable. Virginia does not have collective bargaining agreements.

<b>115.67</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency's policy is written in accordance with the standard. There have been no reported incidents of sexual abuse/harassment that would require the staff to invoke any protections from retaliation. In addition, staff interviews confirmed their knowledge of the requirements for protection from retaliation for both inmate and staff members. All staff members interviewed acknowledged that they had an affirmative requirement to report any incident of retaliation and also reported that they know that they could report such incidents anonymously. Interviews with the PREA Coordinator, Jail Lieutenant and Jail Administrator (Captain) indicate that an inmate in fear of or at risk for retaliation would be monitored very closely and moved to the Regional Jail if need be. The Captain indicated particularly if the allegation involved a staff member, he would talk with the staff personally and let them know that no retaliation or other unprofessional behavior would be tolerated. The Captain stated they would ensure to keep that inmate on everyone's radar.</p> <p>Corrective Action: None</p>

<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency's policy is written in accordance with the standard. The agency has had no allegation of sexual abuse or harassment and therefore no incidents that have required restrictive protective custody. Interviews with the supervisory staff as well as the Jail Lieutenant and PREA coordinator confirmed their knowledge of their requirements to appropriately adhere to the elements of standard 115.43, if a victim's alleges abuse. FCSSO does not have segregated housing and would transfer an inmate to the regional jail if there was a need for segregated housing or if the inmate/victim requested it.</p> <p>Corrective Action: None</p>

<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency's policy is written in accordance with the standard. The agency has had no incidents or allegations that required investigation during the review period. If an allegation were made and needed to be investigated, one of the two investigators with specialized training in sexual assault investigations in confinement settings at the Sheriff's Office would handle the investigation. Auditor confirmed the training of both investigators. Interviews with the investigator, jail lieutenant and PREA coordinator confirm their knowledge of the investigative regulations according to the standard. The investigator is very experienced and knowledgeable and was able to thoroughly articulate all the responsibilities with regard to the standard and walk Auditor through how an allegation and investigation would be handled.</p> <p>Corrective Action: None</p>

<b>115.72</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency's policy is in compliance with the requirements of the standard. Interviews with the agency investigator confirmed that the investigative staff responsible for administrative adjudication of investigations is aware of the requirements of the evidentiary standard. The investigator was able to articulate the evidentiary standard to auditor and the process for interviews and investigations of sexual assault allegations.</p> <p>Corrective Action: None</p>

<b>115.73</b>	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency's policy is written in accordance with the standard. During this review period, the agency reported no allegations or incidents that required reporting the results of an investigation to the alleged victim. The auditor confirmed this with the facility staff during the onsite audit. The agency does have a process in place for inmate reporting purposes and interviews with the Investigator and PREA coordinator confirmed their knowledge of their affirmative requirement to report investigative finding to prisoners in custody.</p> <p>Corrective Action: None</p>

<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency's PREA and Disciplinary policies were reviewed and are in compliance with the requirements of the standard. No incidents of disciplinary action against staff related to a violation of the PREA standards occurred during the review period. Interviews with facility staff and administrators verified that staff consider a violation of the PREA policy to be of sufficient seriousness to warrant termination and prosecution in accordance with the law. In both formal and informal staff interviews, the staff was aware that the agency had a zero-tolerance policy regarding sexual abuse and any such incidents would be investigated and reported to the appropriate agency for prosecution, if necessary.</p> <p>Corrective Action: None</p>

<b>115.77</b>	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency's policy is consistent with the requirements of the standard. There have not been any reported incidents of sexual abuse by volunteer or contract staff during the review period. Interviews with the PREA Coordinator and contract staff provider (kitchen) validated the fact that all such personnel are provided the required training regarding the PREA standards, as well as the presumptive corrective action for anyone found in violation of the PREA policy. In fact, the individuals who were interviewed by the auditor presumed that the offense of sexual abuse or harassment of prisoners was sufficiently serious as to warrant termination/restriction from access and/or criminal prosecution. The volunteer/contract staff training acknowledgement also confirms their notice of the zero tolerance policy.</p> <p>Corrective Action: None</p>

<b>115.78</b>	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency's policy directs that inmates are not permitted to engage in non-coercive sexual contact and may be disciplined for such behavior. During this review period, there have been no incidents of non-coercive sexual contact for which inmates have been disciplined. Interviews with staff and inmates confirmed their knowledge of the policy regarding inmates engaging in non-coerced sexual activity. Furthermore, the staff and inmates were aware that the agency has an internal disciplinary process for inmates who engage in sexually abusive behavior against other inmates and knew that they could be disciplined for sexual abuse. There have been no allegations of sexual abuse during this review period.</p> <p>Corrective Action: None</p>

<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency's policy is consistent with the requirements of the standards. A random check of inmate files validated that the screenings were being conducted in accordance with the standards. During this review period, there have been no instances of an inmate reporting prior victimization. Were that to be the case, the inmate would be transferred to the regional jail, where the inmate could get appropriate follow-up medical and mental health care if needed. The medical officer is also the PREA Coordinator and all screenings and medical information are maintained securely.</p> <p>Corrective Action: None</p>

<b>115.82</b>	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency's policy is written in compliance with the standard. While there have been no allegations of sexual abuse requiring emergency medical or mental health services during the review period, the agency has a forensic nurse on call through the hospital to respond in the case of such an emergency. In addition, after initial treatment at the hospital, the inmate would be transferred to the regional jail where he (or she) could get follow-up medical and mental health services since the FCSO does not have medical or mental health staff on site. The PREA Coordinator as well as the facility administration were interviewed and confirmed the fact that they knew that they had an affirmative responsibility to provide care without regard to the ability of the victim pay for services or identify the alleged abuser, and the requirement to make a provision for pregnancy related medical care and/or STD prophylaxis if required.</p> <p>Corrective Action: None</p>

<b>115.83</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency's policy directs personnel to act in accordance with the standard. There have been no allegations or documented incidents that required medical or mental health treatment during the review period. FCSO does not house female inmates except for short periods of time for court and until transfer to the regional jail. Staff interviews confirmed the presence of policies and procedures consistent with the standard and also confirmed the staffs' knowledge of the policy and standard. An interview with the PREA Coordinator confirmed that if an inmate was sexually assaulted, all provisions of the standard would be met.</p> <p>Corrective Action: None</p>

<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency has a policy that governs the review of all substantiated or unsubstantiated allegations of sexual abuse and the policy is written in accordance with the standard. During the review period the agency had no incidents for review in accordance with this standard. However, the agency has appointed a team that is prepared if necessary to conduct such a review. The process and awareness of the requirement of the standard were articulated in interviews with the Jail Lieutenant and PREA coordinator.</p> <p>Corrective Action: None</p>

<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency's policy is consistent with the requirement of the standard. While the FCSO has had no incidents or allegations in the previous year, the auditor has discussed the data collection process with the PREA Coordinator and reviewed additional secondary documentation in the form of Annual PREA Report.</p> <p>Corrective Action: None</p>

<b>115.88</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The agency has not had any allegations or incidents of sexual assault or harassment in the review period. The agency just recently completed an annual report based on the last year and posted the report on the agency website. The report indicated there had been no allegations or incidents. There was no need for redaction of any information. Since this was this first year of data collection, there were no previous years of data for which to analyze and compare, however staff reports there have been no allegations or incidents in several years. Interviews with PREA coordinator, Jail Lieutenant and Jail Captain indicate a process in place for review and analyzing data collection going forward.</p> <p>Corrective Action: None</p>

<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The FCSO has a comprehensive policy that ensures data collected is securely retained and is written in accordance with the standard. The PREA Coordinator shall ensure that all aggregated sexual abuse data is available to the public, at least annually, through the FCSO website. The agency has not had any incidents to report to date, but according to policy, such data will be maintained and reported according to standards. The PREA Annual Report was just recently completed, made available to the public through the website and indicates that there have been no allegations or incidents of sexual assault or harassment in the review period.</p> <p>Corrective Action: None</p>

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings:</p> <p>The FCSO has worked diligently to come into compliance with the PREA standards. While their initial audit was not completed within the first 3-year period, they have successfully come into compliance with all PREA standards. Going forward, now that they have all the processes in place, they are able to maintain compliance without any significant issues.</p>

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	This is the agency's first audit

## Appendix: Provision Findings

115.11 (a)	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	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)	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	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)	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	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.)	na

115.12 (a)	<b>Contracting with other entities for the confinement of inmates</b>	
	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.)	yes

115.12 (b)	<b>Contracting with other entities for the confinement of inmates</b>	
	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".)	yes

115.13 (a)	<b>Supervision and monitoring</b>	
	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?	no
	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?	no
	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?	no
	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?	no
	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?	no
	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?	no
	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?	no
	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?	no
	Does the agency ensure that each facility's staffing plan takes into	no

	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?	na
	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?	no
	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?	no
	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 ?	no

<b>115.13 (b)</b>	<b>Supervision and monitoring</b>	
	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

<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	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?	no
	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?	no
	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?	no

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).)	na

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).)	na
	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).)	na

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).)	na
	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).)	na
	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).)	na

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)	<b>Limits to cross-gender viewing and searches</b>	
	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)	<b>Limits to cross-gender viewing and searches</b>	
	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)	<b>Limits to cross-gender viewing and searches</b>	
	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)	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	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)	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	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)	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	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)	<b>Hiring and promotion decisions</b>	
	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)	<b>Hiring and promotion decisions</b>	
	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?	yes

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?	no
	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?	no
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes

<b>115.17 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes

<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes

<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	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

<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	
	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)	<b>Evidence protocol and forensic medical examinations</b>	
	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)	<b>Evidence protocol and forensic medical examinations</b>	
	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.)	na
	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.)	na

115.21 (c)	<b>Evidence protocol and forensic medical examinations</b>	
	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)	<b>Evidence protocol and forensic medical examinations</b>	
	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)	<b>Evidence protocol and forensic medical examinations</b>	
	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)	<b>Evidence protocol and forensic medical examinations</b>	
	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)	<b>Evidence protocol and forensic medical examinations</b>	
	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.)	na

115.22 (a)	<b>Policies to ensure referrals of allegations for investigations</b>	
	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)	<b>Policies to ensure referrals of allegations for investigations</b>	
	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)	<b>Policies to ensure referrals of allegations for investigations</b>	
	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)	<b>Employee training</b>	
	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)	<b>Employee training</b>	
	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?	yes

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

115.32 (a)	<b>Volunteer and contractor training</b>	
	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)	<b>Volunteer and contractor training</b>	
	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

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

<b>115.33 (a)</b>	<b>Inmate education</b>	
	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

<b>115.33 (b)</b>	<b>Inmate education</b>	
	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

<b>115.33 (c)</b>	<b>Inmate education</b>	
	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)	<b>Specialized training: Investigations</b>	
	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)	<b>Specialized training: Investigations</b>	
	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)	<b>Specialized training: Medical and mental health care</b>	
	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

<b>115.35 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	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

<b>115.35 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	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

<b>115.35 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	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

<b>115.41 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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

<b>115.41 (b)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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

<b>115.41 (i)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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

<b>115.42 (a)</b>	<b>Use of screening information</b>	
	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

<b>115.42 (b)</b>	<b>Use of screening information</b>	
	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?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	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)	<b>Inmate access to outside confidential support services</b>	
	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?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies?	yes
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes

115.53 (b)	<b>Inmate access to outside confidential support services</b>	
	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)	<b>Inmate access to outside confidential support services</b>	
	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)	<b>Third-party reporting</b>	
	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

<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	
	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

<b>115.62 (a)</b>	<b>Agency protection duties</b>	
	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

<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	
	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

<b>115.63 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes

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

<b>115.63 (d)</b>	<b>Reporting to other confinement facilities</b>	
	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)	<b>Staff first responder duties</b>	
	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)	<b>Staff first responder duties</b>	
	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)	<b>Coordinated response</b>	
	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

<b>115.66 (a)</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>	
	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?	yes

<b>115.67 (a)</b>	<b>Agency protection against retaliation</b>	
	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

<b>115.67 (b)</b>	<b>Agency protection against retaliation</b>	
	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

<b>115.67 (e)</b>	<b>Agency protection against retaliation</b>	
	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

<b>115.68 (a)</b>	<b>Post-allegation protective custody</b>	
	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

<b>115.71 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.71 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.71 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.71 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	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?	yes

<b>115.71 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.71 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.71 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	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

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

<b>115.71 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.71 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.71 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	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

<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	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

<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	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

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

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

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

<b>115.76 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	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

<b>115.76 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	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)	<b>Corrective action for contractors and volunteers</b>	
	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)	<b>Corrective action for contractors and volunteers</b>	
	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)	<b>Disciplinary sanctions for inmates</b>	
	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)	<b>Disciplinary sanctions for inmates</b>	
	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)	<b>Disciplinary sanctions for inmates</b>	
	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

<b>115.78 (d)</b>	<b>Disciplinary sanctions for inmates</b>	
	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?	yes

<b>115.78 (e)</b>	<b>Disciplinary sanctions for inmates</b>	
	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

<b>115.78 (f)</b>	<b>Disciplinary sanctions for inmates</b>	
	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

<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	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

<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	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

<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</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, 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

<b>115.81 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	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

<b>115.81 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	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

<b>115.81 (e)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	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

<b>115.82 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	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)	<b>Access to emergency medical and mental health services</b>	
	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)	<b>Access to emergency medical and mental health services</b>	
	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)	<b>Access to emergency medical and mental health services</b>	
	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)	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	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)	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	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

<b>115.83 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes

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

<b>115.83 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	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.)	na

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

<b>115.83 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	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

<b>115.83 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	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

<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	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

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

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

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

<b>115.87 (c)</b>	<b>Data collection</b>	
	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

<b>115.87 (d)</b>	<b>Data collection</b>	
	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

<b>115.87 (e)</b>	<b>Data collection</b>	
	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.)	yes

<b>115.87 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes

<b>115.88 (a)</b>	<b>Data review for corrective action</b>	
	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

<b>115.88 (b)</b>	<b>Data review for corrective action</b>	
	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

<b>115.88 (c)</b>	<b>Data review for corrective action</b>	
	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

<b>115.88 (d)</b>	<b>Data review for corrective action</b>	
	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

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

<b>115.89 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes

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

<b>115.89 (d)</b>	<b>Data storage, publication, and destruction</b>	
	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

<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	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

<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	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

<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes

<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes

<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes

<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	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

<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	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