

PREA Facility Audit Report: Final

Name of Facility: Grant County Jail

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 06/12/2020

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: William Sawyer	Date of Signature: 06/12/2020

AUDITOR INFORMATION	
Auditor name:	Sawyer, William
Address:	
Email:	WSawyer61@gmail.com
Telephone number:	
Start Date of On-Site Audit:	05/15/2020
End Date of On-Site Audit:	05/16/2020

FACILITY INFORMATION	
Facility name:	Grant County Jail
Facility physical address:	205 S Humbolt St. , Canyon City, Oregon - 97820
Facility Phone	
Facility mailing address:	

Primary Contact	
Name:	Josh Wolf
Email Address:	wolfj@grantcounty-or.gov
Telephone Number:	541-575-1134

Warden/Jail Administrator/Sheriff/Director	
Name:	Sheriff Glenn E Palmer
Email Address:	palmerg@grantcounty-or.gov
Telephone Number:	541-575-1131

Facility PREA Compliance Manager	
Name:	
Email Address:	
Telephone Number:	
Name:	Wade Waddel
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Telephone Number:	M: (541) 575-1134

Facility Characteristics	
Designed facility capacity:	41
Current population of facility:	10
Average daily population for the past 12 months:	18
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	
Age range of population:	25-55
Facility security levels/inmate custody levels:	all - min, med ,max
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	13
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	1
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	2

AGENCY INFORMATION	
Name of agency:	Grant County Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	205 S Humbolt St., Canyon City, Oregon - 97820
Mailing Address:	
Telephone number:	541-575-1134

Agency Chief Executive Officer Information:	
Name:	Glenn E. Palmer
Email Address:	gepalmer400@centurytel.net
Telephone Number:	541-575-1131

Agency-Wide PREA Coordinator Information			
Name:	Josh Wolf	Email Address:	wolfj@grantcounty-or.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 National PREA Resource Center (PRC) is funded by the Department of Justice (DOJ), Bureau of Justice Assistance (BJA) through a cooperative agreement with the National Council on Crime and Delinquency (NCCD). The Certified PREA Auditor, Bill Sawyer, received formal training through the Department of Justice and the PREA Resource Center (PRC) on all facets of the PREA standards and received additional follow-up training including participating in the field auditing training program offered through PRC.

Bill Sawyer, conducted a complete pre-audit and site audit at the Grant County Jail located in Canyon City, Oregon and operated by the Grant County Sheriff's Office (GCSO). The onsite portion of the audit occurred on May 15, 2020 (Due to Covid 19 safety precautions, the onsite portion of the audit was able to be conducted in one day as all of the primary PREA audit interviews with the PREA Coordinator, management staff, random staff, and speacialized satff, were completed prior to the onsite audit, 4/30/20, 5/5/20, 5/6/20, and 5/7/20).

During the pre-audit phase of the GCSO audit, the Jail Sergeant (PREA Coordinator), acquired access to the PREA Audit Portal and submitted the pre-audit questionnaire (PAQ) with attached policies, procedures, and documents related to the Grant County Jail for the auditor to review in advance of the site audit. Documents on the online portal consisted of the GCSO PREA Policy, the agency/facility zero-tolerance policy relating to sexual abuse/harassment, agency and facility organizational charts, and other supporting documentation. During the weeks leading up to the site audit, the auditor reviewed the information and how it related to the PREA standards and the interim report in order to properly prepare for the onsite audit. Prior to the onsite audit, the facility provided the auditor with photographs that served as verification of posting of the Notice of Audit, advising offenders and staff that a PREA audit was scheduled to take place. The Notice provided contact information for the PREA auditor. As a result of the notice, the auditor did not receive any confidential correspondence from inmates or staff.

During ther onsiste audit (5/15/20), the auditor met with the PREA Coordinator to discuss the onsite audit process. A facility tour was provided as an opportunity to conduct in-depth observations of each area of the facility, observe staff conduct, observe interactions between staff and offenders, and conduct informal interviews with staff and offenders to gain an understanding of facility operations and practices as well as obtain insight into the facility's compliance with the PREA standards. The areas that were observed included administration, living units, work areas, bathroom and shower facilities, indoor and outdoor recreation areas, and the overall facility grounds. Video monitoring systems were observed and noted, and the auditor took thorough notes during the entire tour.

Prior to the onsite audit (Duwe to Covid 19 precautions), the auditor interviewed the PREA Coordinator, the Under Sheriff, HR, Nurse, a victim advocate from Heart of Grant County, and a wide-range of staff that included day and night shift deputies, deputies who conduct intake screening/assessment, the training coordinator, and a PREA investigator (5 Deputies). Additionally, random offenders were interviewed including 5 male inmates and 1 female inmate (At time of the interviews, there were 5 male

inmates and 3 female inmates housed in the facility). All of the staff and inmates were very cooperative during the interview process and the auditor appreciated the effort the entire facility put forth to accommodate the auditor by setting up a private area with a laptop for inmates to use Zoom and allowing staff a private area for telephonic interviews. The facility made positive efforts to ensure the audit process went as smoothly as possible.

Throughout the site audit, the auditor conducted a thorough review of various documents including personnel records, investigation files, training and education records, assessment and screening tools, a vulnerability assessment, 100% of current inmate medical files, and a variety of other materials relating to the PREA standards and compliance. Reviewing documentation is a critical component of the audit process and the auditor was responsible for gathering and reviewing required documentation that was provided by the PREA Coordinator. .

At the close of the site audit, 5/15/20, the PREA auditor conducted a short meeting with the PREA Coordinator that included a general overview of the observations, and to thank him and the staff for their participation and restate the timeline, deliverables, and expectations for the remainder of the audit process. Following the site audit, the auditor had 30 days to request further documentation from the facility, conduct any additional follow-up with the facility, and draft the interim report of the team's audit findings.

AUDIT FINDINGS

Facility Characteristics:

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

The Grant County Jail is located at 205 S. Humbolt St, Canyon City, Oregon. The facility was built in 1997 and has a capacity to hold 41 inmates and can house both male and female adult inmates (No juvenile offenders are housed in the facility). The jail is operated by the Grant County Sheriff's Office which is led by Sheriff Glenn Palmer. The jail executive team includes the Under Sheriff and Sergeant, who is also designated as the PREA Coordinator. At the time of the onsite audit (5/15/20) the jail had an inmate population of 6 inmates that included 3 males and 3 females (During the interview process with inmates, 5/5/20, there were 8 inmates in the facility, 5 males and 3 females).. The physical design of the facility is conducive for compliance with PREA standards and includes 3 single housing units, 2 multiple occupancy units, 6 dorm housing units, and 4 segregation cells. The control center is centrally located in order to have an effective view of each unit and is enhanced with a modern video surveillance system that has the ability to record with DVR and the system has been upgraded in order to store more data. Each dorm has private areas for shower and bathroom facilities and that allows for adequate privacy for inmates while maintaining safety and security. Since the prior audit (August of 2017) Deputies now wear body cameras when leaving the control room and entering areas where they may have contact with inmates. Staff were reportedly very respectful when entering any dorm area, which was kept to a minimum, and included proper announcement by staff. All inmates that were interviewed advised the auditor they felt safe in the facility and that Deputies were all respectful and professional during their interactions. The facility has an enclosed outdoor recreation area that is properly monitored by staff and video cameras. All areas of the jail have excellent video coverage including the kitchen, library and visiting areas. All visiting within the facility is conducted through glass and all visitation is "no contact." The facility is staffed by 8 full-time Jail Deputies, 2 part-time Jail Deputies, and 2 Sergeants (there is always one Sergeant on duty or on-call), along with support staff, and a nurse who is contracted through Blue Mountain Hospital. Mental health services are provided for the county through Community Counseling Solutions.

AUDIT FINDINGS

Summary of Audit Findings:

The OAS will automatically calculate the number of standards exceeded, number of standards met, and the number of standards not met based on the auditor's compliance determinations. If relevant, the auditor should provide the list of standards exceeded and/or the list of standards not met (e.g. Standards Exceeded: 115.xx, 115.xx..., Standards Not Met: 115.yy, 115.yy). Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:	0
Number of standards met:	45
Number of standards not met:	0

The PREA audit for the Grant County Jail determined the facility is meeting 100% of the PREA standards. Recommendations have been made through certain sections of the report that can be utilized to enhance compliance and to serve to assist the agency in exceeding compliance in certain areas for future audits. The Grant County Jail facility was within the guidelines for "meeting" each of the 45 PREA standards as outlined in the compliance tool and subsequent report.

Exceeds Standards: 0

Meets Standards: 45

Does Not Meet Standards: 0

The following standards from each category contained within the PREA Auditing Tool were thoroughly reviewed and compliance was indicated for each standard as indicated below:

Prevention Planning:

Standards 115.11-115.18, Meets Standards.

Responsive Planning:

Standards 115.21-115.22, Meets Standards

Training and Education:

Standards 115.31-115.35, Meets Standards

Screening for Risk of Sexual Victimization and Abusiveness:

Standards 115.41-115.43, Meets Standards

Reporting:

Standards 115.51-115.54, Meets Standards

Official Response Following an Inmate Report:

Standards 115.61-115.68, Meets Standards

Investigations:

Standards 115.71-115.73, Meets Standards

Discipline:

Standards 115.76-115.78, Meets Standards

Medical and and Mental Health care:

115.81-115.83, Meets Standards

Data Collection and Reviews:

Standards 115.86-115.89, Meets Standards

Auditing and Corrective Action:

115.401 and 115.403, Meets Standards

Standards

Auditor Overall Determination Definitions

- Exceeds Standard
(Substantially exceeds requirement of standard)
- Meets Standard
(substantial compliance; complies in all material ways with the stand for the relevant review period)
- Does Not Meet Standard
(requires corrective actions)

Auditor Discussion Instructions

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>During the pre-audit process, the auditor conducted a thorough review of the agency's PREA Audit Questionnaire, the Grant County PREA Policy and procedures, and the organizational structure. On May 15, 2020, the onsite audit was conducted at the Grant County Jail, located in Canyon City, Oregon, and a comprehensive tour of the facility and indepth file reviews were conducted. Due to Covid 19 policies and concerns, the onsite portion of the audit was limited, and prior to the onsite audit, interviews were conducted via telephone with the PREA Coordinagtor, Josh Wolf (interview conducted 4/30/20). On the morning of May 5, 2020, an interview was conducted with Under Sheriff, Zack Mobley and with Sergeant, Wade Waddell. The interviews with the upper management of the facility verified the standards for 115.11 were being met and the agency should be praised on the collaborative effort between all of the staff within the facility while working towards becoming PREA compliant under the leadership of the PREA Coordinator and the PREA Compliance Manager.</p>

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The agency has not entered into or renewed a contract for the confinement of inmates on or after August 20, 2012. This section is scored as N/A.

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Per Grant County Sheriff's PREA Policy, page 5, the agency requires the jail facility to develop, document and comply with a staffing plan that provides for adequate levels of staffing, along with maintaining effective video monitoring to help protect inmates against abuse. This was verified through pre-audit review of questionnaire and policy and was verified during the onsite audit through observation and via interviews with staff and management prior to the onsite audit (Interviews with PREA Coordinator and jail management staff occurred 4/30/20 and 5/5/20). The Jail sergeant and under sheriff will review this plan yearly to determine if modifications need to be made to promote the safety of inmates. Items to consider could include staffing levels, new technologies available and other county resources available.</p> <p>A thorough review was conducted of the agency's PREA Audit Questionnaire, and the PREA Policy and Procedures. Prior to the onsite portion of the audit, private interviews were conducted with the Under Sheriff and the PREA Coordinator that verified at least once a year the facility reviews the staffing plan to determine whether adjustments are needed to the staffing plan itself, prevailing staffing patterns, the video monitoring system, and the allocation of resources to ensure compliance with the staffing plan while considering PREA standards and Oregon Jail Standards. The facility is subject to an audit for the Oregon Jail Standards every two years and has remained compliant. There have not been any deviations from the staffing plan. This was also verified during the onsite portion of the audit that took place on, 5/15/20.</p> <p>Per Grant County Sheriff's PREA Policy, section E.6: E.6 Unannounced rounds. Intermediate-level or higher-level supervisors will conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. a. These rounds shall cover night shifts as well as day shifts. Staff will not alert other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility. Staff will note in the daily log the date, time and which supervisor. b. Unannounced reviews will be conducted on a random basis. Unannounced reviews will be documented. Documentation should be noted as follows: date, time, which supervisor. This policy was reviewed prior to the onsite audit and was verified that it was being put into practice through interviews during the onsite audit with random staff and facility management.</p>

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Per Grant County Sheriff's PREA Policy, page 6, Receiving Juveniles: This policy addresses the secure and non-secure custody of juveniles. It is the policy of the Grant County Sheriff's Department to deny admission to persons under the age of 18 unless there is a commitment order signed by a Circuit Court Judge specifying that the person under the age of 18 is remanded or otherwise ordered to be confined in adult correctional facilities, and; A. Persons under 18 years of age shall not be admitted to the jail unless the person is charged, as defined by ORS 137.705(1) (a) (A), with a crime under ORS 137.707 and is 16 or 17 years of age. The juvenile shall then be detained in custody in a jail or other place where adults are detained subject to release on the same terms and conditions as for adults. B. If a person charged with a crime under ORS 137.707 is under 16 years of age, the person may not be detained, either before conviction or after conviction but before execution of sentence, in a jail or other place where adults are confined. C. Notwithstanding the previous paragraphs, the sheriff and the director of the county juvenile department may agree to detain the person charged in a place other than the county jail. During the onsite audit and prior to the onsite audit through interviews with the Under Sheriff, Sergeant (PREA Coordinator) and random staff, it was verified the facility does not house youthful inmates and is following the facility policies that meet PREA standards.</p>

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of the Grant County Sheriff's PREA Policy determined the policy meets the PREA standards. On 5/5/20 and 5/6/20, prior to the onsite audit, interviews with random staff (male and female) and random inmates (5 male inmates and 1 female inmate out of a current population of 8 inmates), verified the facility is not conducting cross-gender strip or cross-gender visual body cavity searches of inmates. * The facility has a designed capacity of 41 inmates. There is currently space for approximately 6 females and 35 male inmates. During the onsite audit (5/15/2020) there were 3 male inmates and 3 female inmates being housed in the facility . The policy and practices implemented by the facility meets PREA standards.</p> <p>A review of the policy/documentation verified the policy meets the PREA standards. Per Grant County Sheriff's PREA Policy, Cross-Gender Surveillance: Due to the size of the facility cross gender supervision is required to operate the facility. However, privacy barriers, and procedures outlined in this section shall be followed to afford inmate reasonable privacy. Grant County Sheriff Office generally, and jail supervisors and employees specifically shall make a reasonable effort to minimize the degree of sexual privacy intrusions which occur as a result of cross-gender searches and supervision. A thorough review of the policy was conducted prior to the onsite audit. During the onsite audit on the morning of May 15, 2020, a tour of the facility verified that privacy barriers, privacy glass, and shower curtains were being utilized to provide inmates adequate privacy and enabled inmates to shower, perform bodily functions, and change clothing without non-medical staff being able to view their breasts, buttocks, or genitalia except when such viewing is incidental. Interviews with male and female inmates verified they all felt their privacy was being respected and they thought the barriers provided were adequate and staff were being respectful of their privacy. The facility has a capacity of 41 inmates. During the onsite audit there were 3 male inmates and 3 female inmates which, according to staff, was below average, mostly due to Covid 19 procedures where Courts were limiting the number of people being sentenced to jail. There are a minimum of two security staff on duty at all times along with a supervisor (sergeant or Under Sheriff). Normally, every shift has at least one female deputy on duty. Per policy, Deputies of the opposite gender will knock and announce themselves before entering a dorm. Prior to the onsite audit, interviews with facility management, random staff, and 5 male inmates and 1 female inmates via telephone or Zoom, verified the policy and procedures are being followed and the facility is meeting these PREA standards.</p> <p>A review of Grant County Sheriff's PREA Policy, page 6, verified the policy is meeting PREA standards. Staff will not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. Interviews with management staff and random staff verified there was an inmate who identified as Transgender housed in the facility during late 2018 and was released 1/7/2019. This inmate identified as being female and interviewed with random staff, the nurse, and managers verified this inmate was treated with respect and dignity and all policy and procedures were followed during the time of her incarceration. No inmates who identified as transgender were being housed in the facility during the time of this audit. A review of the training records of all full-time Deputies verified 100% have received training on conducting cross-gender pat-down searches and searches of</p>

transgender and intersex inmates in a professional and respectful manner, consistent with security needs.

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility has appropriate procedures to provide disabled inmates and those with a language barrier the opportunity to receive all information and interventions pertaining to PREA policies and procedures. The jail facility worked in a collaborative effort with Oregon Dept of Corrections to obtain the "Language Line Personal Interpreter Service" to enable the facility to cross the language barrier with inmates. The PREA training video provided to inmates is in English and Spanish. Written materials pertaining to PREA is also provided in Spanish.</p> <p>A thorough review of the PREA policy and interviews with random staff and male and female inmates verified the agency prohibits use of inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations. There were not any inmates with disabilities or who were limited English proficient begin housed in the facility who could be interviewed.</p>

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>PREA policy created by the Grant County Sheriff's Office follows all of the PREA standards, The policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination. The HR manager verified the agency policy requires that a criminal background record check be completed before enlisting the services of any contractor who may have contact with inmates. The only contracted position being utilized by the facility is the nurse and her position falls under the existing PREA policy that meets the standards. The auditor conducted a review of personnel files that verified criminal background checks had been completed.</p>

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The tour of the facility during the onsite audit, 5/15/20 and interviews with the Under Sheriff and PREA Coordinator verified the facility has not updated the video monitoring system since the last PREA audit that took place during 2017, except the video system can now store more data and officers now wear body cams when they leave the control room and may have contact with inmates. These updates to video storage, along with the use of body cams by officers, were designed to provide better safety and security for staff and inmates while following PREA standards.</p>

115.21	<p>Evidence protocol and forensic medical examinations</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Per GCSO PREA policy, page 9-10, the agency will offer all inmates who experience sexual abuse access to forensic medical examinations without financial cost to the victim. The local hospital, Blue Mountain Hospital, has trained doctor's who will perform SAFE/SANE examinations and the City of La Grande also has a Rape Crisis Center available if needed. Additionally, a nurse at Blue Mountain Hospital is completing training and certification to be a SAFE/SANE nurse and will be available to provide those services mid-summer of 2020. There has not been any reports or incidents of sexual abuse at the jail facility and, therefore, have not been any exams performed by SANE/SAFEs during the past 12 months. Policy and procedures are in place that requires any incidents relating to sexual abuse be thoroughly documented and the facility will be required to document efforts to provide services of a SAFE/SANE nurse or doctor. .</p> <p>A policy review and interviews with the PREA Coordinator and Under Sheriff verified GCSO has a formal agreement with the local agency, Heart of Grant County, who will be on call and available to provide victim advocate services to victims of sexual abuse. If requested by the victim, a victim advocate from Heart of Grant County will accompany and support the victim through the forensic medical examination process and investigatory interviews and will provide emotional support, crisis intervention, information, and referrals. There have not been any incidents of sexual abuse reports at the jail facility so there were not any inmates who have reported sexual abuse available to interview during the audit.</p> <p>Per GCSO PREA policy, the State Police, with assistance from the GCSO patrol deputies, will conduct all administrative and criminal investigations for incidents of sexual abuse. The State Police and GCSO follow required evidence protocol. (The Oregon State Police is also responsible for conducting all allegations of sexual abuse for the Oregon Department of Corrections as well and are highly trained in PREA requirements for these investigations).</p>
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115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Per GCSO PREA policy, page 10, the agency will require all PREA related allegations to be referred for investigation by the Oregon State Police and non-jail GCSO investigators. Policy also requires the Sergeant to ensure a complete tracking system is utilized, and is responsible to make sure statistical data is retained. and the policy is published on their website. All steps in the process will be fully documented, per policy. Policy is posted on their website, GCoregonlive2.com. The 3 investigation over the past 12 months have been completed and were unfounded. There is one administrative investigation that was initially investigated by State Police and the DOJ is in the process of completing the investigation. The staff member is on administrative leave. All policies and procedures relating to PREA investigations and associated documentation were followed.</p>

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A thorough review of the GCSO PREA policy, their training plan and training logs, and interviews with management staff and random jail staff (day shift, night shift, male and female) verified the agency is providing training to all employees who may have contact with inmates on the agency's zero-tolerance policy for sexual abuse and sexual harassment. The materials utilized were provided by the Oregon Department of Corrections, the National Institute of Corrections (NIC), and the PREA Resource Center and meets all of the PREA standards. Personnel files were reviewed that verifies all personnel are receiving PREA training at intervals that meets PREA standards.</p> <p>A thorough review of the GCSO PREA policy, their training plan and training logs, and interviews with management staff and random jail staff verified the agency is providing training to all employees who may have contact with inmates on the appropriate supervision of male and female inmates, including training on cross-gender pat downs.</p> <p>A review of the Employee Training Plan and training records verified the facility is providing refresher training at least once per year that meets the PREA standards and the facility has also began conducting refresher training each month on various standards.</p> <p>A review of staff personnel files and training records, along with interviews with random staff verified the agency documents that employees who may have contact with inmates understand the training they have received through employee signatures.</p>

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The GCSO jail facility employs one nurse contractor who was interviewed on 5/7/20 via telephone and she stated she received training that meets PREA standards. During the pre-audit process and onsite audit, a review of training records and PREA policy verified contractors who have contact with inmates have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response. (there are not other contractors or volunteers working within the facility at the time of the audit but current policy will dictate that PREA standards be followed). Interviews with the jail nurse, management staff, and a review of the signed PREA Acknowledgement Statement (signed by the contracted nurse) verified the facility is meeting these standards.</p>

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The GCSO is providing PREA information in English and Spanish and has the interpreter hotline available if necessary. GCSO recently obtained PREA information in Braille format, which they obtained from the Oregon Department of Corrections, and the GCSO will coordinate with their internal staff and local agencies to insure deaf and visually impaired are able to receive the same quality education relating to PREA as all other inmates. GCSO PREA policy follows all PREA standards for section 115.33(d).</p> <p>GCSO PREA policy, indicates the agency shall maintain documentation of inmate participation in PREA education sessions. Interviews with jail management and a review of inmate files verified this is occurring.</p> <p>The onsite audit of the facility (May 15, 2020) verified the facility has PREA policy and posters, and pamphlets available throughout the facility. The jail has PREA pamphlets and PREA information posted and available for the public in the visiting room. The facility is compliant with section 115.33(f)</p>

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of GCSO PREA policy verified the policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings. The facility will utilize the Oregon State Police for any PREA related investigations, however, two jail Sergeants and two patrol officers are trained as investigators for the initial phases of any PREA incident. This was verified through interviews and a review of training records.</p> <p>GCSO maintains documentation showing investigators have completed the required training. A Certificate of Completion for the current online curriculum, "PREA: Investigating Sexual Abuse in a Confinement Setting," offered by the NIC Academy, is maintained as a record of completion.</p>

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Per GCSO PREA policy, part-time medical and mental health care practitioner will be trained in PREA policy and practices. Currently, the jail only employs one part-time nurse who provides initial medical care to inmates and has direct contact with inmates. An interview with the nurse on, 5/7/20, and a review of training records, verified she is receiving the required training. Forensic medical exams are conducted at the local hospital. The GCSO maintains records verifying the nurse has received the required PREA training.</p>

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The GCSO Custody Classification form includes an objective risk assessment The GCSO Intake victimization Screening Tool is inclusive of items related to risk of being sexually abused, along with procedures to follow if an inmate is identified as being transgender, intersex, or gender non-conforming. A review of the classification tool and the Intake Victimization Screening tool, along with interviews with jail staff, verified the facility is fully complaint with PREA standards. The screening tool meets PREA standards ans includes: 1) Whether the inmate has a mental, physical, or developmental disability; (2) The age of the inmate; (3) The physical build of the inmate; (4) Whether the inmate has previously been incarcerated; (5) Whether the inmate's criminal history is exclusively nonviolent; (6) Whether the inmate has prior convictions for sex offenses against an adult or child; (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; (8) Whether the inmate has previously experienced sexual victimization; (9) The inmate's own perception of vulnerability; and (10) Whether the inmate is detained solely for civil immigration purposes.</p> <p>Per GCSO PREA policy, page 15-16, the facility reassesses each inmate's risk of victimization or abusiveness within a set time period, not to exceed 30 days after the inmate's arrival at the facility, based upon any additional, relevant information received by the facility since the intake screening. A few were just over the 30-day mark and the facility is making adjustments to the calendar to make sure 100% will be conducted within the 30 days.</p> <p>The auditor verified that GCSO PREA policy, page 15-16, follows the PREA standard through a review of policy and interviews with random staff. A review of the GCSO PREA policy and interviews with the PREA Coordinator, management staff, and random staff staff (all can conduct intakes), verified that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to questions.</p>

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Interviews with the PREA Coordinator, intake staff (jail Deputies), the jail nurse, and a review of PREA policy, verified the facility uses information from the risk screening required by §115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. GCSO PREA policy, section I.2, mandates staff to make individualized determinations about how to ensure the safety of each inmate. This is supervised by the facility Sergeant and the Under Sheriff. A review of the GCSO policies and procedures, entitled, "Transgender Booking Procedures" and interviews with the PREA Coordinator and the Under Sheriff verified the procedures in place will be followed in the event a transgender inmate enters their facility. A transgender inmate was housed at the facility between November 2018 and January of 2019 and all policies and procedures were followed. This was verified through interviews with the PREA Coordinator, a Sergeant and random staff.</p>

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The GCSO PREA Policy, pages 17-18 (Protective Custody) prohibits the placement of 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. Interviews with the PREA Coordinator and Under Sheriff verified policy is being followed and there were "zero" inmates placed at risk of sexual victimization by being held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment: Inmates are immediately classified, screened, and assessed for risk and then moved to a housing unit unless they are intoxicated or are deemed a security threat due to aggressive behavior. Per policy and practices (as verified through interviews with random jail staff), inmates placed in segregated housing have access to programs, privileges, education, and work opportunities to the extent possible and the facility is compliant with PREA standards. Interviews with random staff and inmates, the jail nurse, and the Under Sheriff verified there have not been any inmates identified as being at risk of sexual victimization who were assigned to involuntary segregated housing for longer than 30 days while awaiting alternative placement. A review of inmate files and interviews with management staff determined there has not been any inmates placed in involuntary segregation housing for risk of sexual victimization in the past 12 months. GCSO PREA Policy is being followed and the facility is PREA compliant.</p>

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of GCSO PREA Policy, pages 18-19, (Inmate Reporting) verified the agency has established procedures allowing for multiple internal ways for inmates to report privately to agency officials about: (a) sexual abuse or sexual harassment; (b) retaliation by other inmates or staff for reporting sexual abuse and sexual harassment; and (c) staff neglect or violation of responsibilities that may have contributed to such incidents.</p> <p>Per GCSO PREA Policy, the agency has an agreement with the Heart of Grant County organization that can be used as a resource for inmates to report abuse or harassment to a public or private entity or office that is not part of the agency. The Heart of Grant County has a direct number and also a 24-hour hotline that is provided to inmates, along with a mailing address. This information is placed on posters throughout the facility and is located in the inmate handbook and the PREA Pamphlet. On 5/7/20, an interview with a victim advocate from Heart of Grant County verified this agreement.</p> <p>Interviews with random staff (Two day shift and two from graveyard shift) verified they have been trained and aware of policy relating to procedures for staff to privately report sexual abuse and sexual harassment of inmates and they were aware of the various ways they can anonymously report any knowledge of sexual abuse/harassment taking place in the facility. Each staff member was aware of the variety of confidential ways they can report abuse. Additionally, each staff member has signed a PREA Acknowledgement Statement form that clearly explains the zero-tolerance policy and the policy that all forms of sexual abuse or harassment between inmates and employees/volunteers/contractors/interns is prohibited and staff has a duty to report any knowledge of abuse to their supervisor or an appropriate 3rd party.</p>

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>GCSO PREA Policy, page 19-20, Exhaustion of Administrative Remedies is fully compliant with the PREA standards. Inmates may submit a grievance regarding an allegation of sexual abuse at any time, regardless of when the incident is alleged to have occurred. The inmate handbook provides the appropriate information to inmates regarding PREA and filing grievances. GCSO PREA Policy requires that a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 30 days of the filing of the grievance. The agency provided the auditor copies of all grievances they received over the past 12 months. None of grievances involved allegations of sexual abuse or harassment. The agency follows the policy relating to grievances and are fully compliant with the PREA standards. permits third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of inmates. The policy requires that if an inmate declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the inmate's decision to decline.</p> <p>The PREA Policy mandates procedures for filing an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse and for emergency grievances alleging substantial risk of imminent sexual abuse requires an initial response within 48 hours. The facility has not had any emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months.</p> <p>GCSO PREA Policy, pages 19-20, states the agency limits its ability to discipline an inmate for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the inmate filed the grievance in bad faith. A review of all of the grievances filed within the jail over the past 12 months found that "zero" alleged sexual abuse and therefore, "zero" resulted in disciplinary action by the agency against the inmate for having filed the grievance in bad faith.</p>

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Per GCSO PREA Policy pages 20-21, Inmate Access to Confidential Community-Based Services, GCSO will provide inmates access to outside victim advocates for emotional support services related to sexual abuse via The Heart of Grant County organization. The mailing address, phone number, and 24-hour hotline is provided to all inmates at intake and pamphlets with all of the information can be found in each housing area and is posted throughout the facility.</p> <p>Per GCSO PREA Policy pages 20-21, the facility informs inmates, prior to giving them access to outside support services, the extent to which such communications will be monitored. Information relating to mandatory reporting rules are provided to inmates. This was verified through interviews with 6 out of the 8 inmates housed in the facility during the interview process conducted, May 5 to May 6, 2020, via Zoom due to Covid 19 precautions.</p> <p>GCSO has a formal agreement with the Executive Director of Heart of Grant County, to be appointed as the outside agency that will accept inmate reports of sexual abuse or harassment in a confidential manner. The auditor reviewed the agreement, interviewed a sexual assault advocate from Heart of Grant County on, 5/7/20, and the facility is compliant with PREA standards.</p>

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Per GCSO PREA Policy, page 21, Third Party Reporting, the agency provides a method to receive third-party reports of inmate sexual abuse or sexual harassment. The facility posts information on how to report inmate sexual abuse or sexual harassment on behalf of inmates in the visiting room. The pamphlet provided within the visiting room entitled "What Can I do to Help Keep my Family and Friends Safe While in Jail," clearly outlines the zero-tolerance policy, how to report an incident of sexual abuse/harassment, and how to report information to the Sheriff's Office or the Heart of Grant County (outside organization).</p>

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>GCSO PREA Policy pages 21-22, Staff and Agency Reporting Duties, requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. Interviews while onsite with random staff verified they were all aware of the PREA Policy relating to mandatory reporting and the requirement for all staff to report immediately and according to agency policy any retaliation against inmates or staff who reported such an incident. GCSO PREA Policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions. Random interviews with day shift and graveyard staff verified they were all aware of PREA Policy relating to staff reporting requirements. Interviews with the Under Sheriff, PREA Coordinator, and the contracted nurse verified the agency is following policy and staff shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.</p>

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>GCSO PREA Policy, page 22, Agency Protection Duties, mandates the facility take immediate action when an inmate is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the inmate (i.e., it takes some action to assess and implement appropriate protective measures without unreasonable delay). In the past 12 months, the facility has not determined that any inmate was subject to a substantial risk of imminent sexual abuse. This was verified through interviews with the Under Sheriff, PREA Coordinator, the jail nurse, and random inmates (5 male and 1 female) along with inmate file reviews.</p>

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Compliant per GCSO PREA Policy page 22, "Reporting to Other Confinement Facilities." Interviews and file reviews verified that during the past 12 months, there were two female inmates received from DOC who had filed allegations of sexual abuse with DOC at Coffee Creek Correctional Facility before they were transferred to Grant Co Jail. The PREA Coordinator and the Under Sheriff were made aware of these allegations, and the active investigation by DOC, prior to their transfer to Grant Co Jail. There were two other intakes at Grant Co Jail who made allegations of prior sexual abuse from other facilities. The jail staff followed the PREA policy and procedures and it was reported to the PREA Coordinator, who notified the Sheriff, and the Sheriff notified the Jail Commander at the alleged facility within 72 hours. The alleagtions were properly investigated, per PREA standard.</p>

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>GCSO PREA policy requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence. However, the only non-security staff working within the facility is the nurse and she is aware of the proper actions to take, per PREA policy. This was verified through interviews with random staff and the jail nurse. The nurse works in the facility just one day a week for a few hours, or as needed, and she is escorted in and out of the facility by security staff.</p>

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	GCSO PREA Policy page 23, Coordinated Response, is a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Grant County has a bargaining agreement with Grant Co Police Officers Association (Currently 7/1/17 to 6/30/20). The collective bargaining agreement in place does not 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.

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Per GCSO PREA Policy, page 24, "Agency Protection Against Retaliation" the agency is meeting all PREA standards for this item. GCSO has designated the Jail Sergeant and the PREA Coordinator to monitor any possible retaliation. Interviews with the Under Sheriff and Jail Sergeant (designated to monitor any retaliation) verified the facility is compliant with all PREA standards for this section.</p>

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>GCSO PREA Policy, page 25, prohibits the placement of inmates who allege to have suffered sexual abuse 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. There have been "zero" inmates who have alleged to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment. This was verified through interviews with the Jail Sergeants, Under Sheriff, and random inmates, along with inmate file reviews.</p>

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Interviews with the designated PREA investigators verified they have received 4 hours of PREA Investigator training. This can always be enhanced and improved but meets PREA standards criteria as it covers all required areas. of investigation techniques and strategies. The Oregon State Police,, who will be conducting the PREA Investigations once the initial investigations have been completed, receive regular training relating to sexual abuse investigations as they are the primary investigators for the Oregon Department of Corrections as well. No allegations of sexual abuse have occurred with the facility. One case is currently being investigated by State Police, and then by DOJ, relating to allegations of inappropriate conduct between a staff member and former inmate. All proper procedures are being followed. Interviews with the PREA Coordinator (Sergeant) and the Under Sheriff, and a review of GCSO PREA policy, verified when outside agencies investigate sexual abuse, the facility shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation. No inmates who reported sexual abuse were available to interview as the facility has not had any incidents related to sexual abuse/harassment. Per GCSO PREA policy, and the policy of the Oregon State Police, substantiated allegations of conduct that appear to be criminal are referred for prosecution.</p>

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	A review of GCSO PREA Policy, pages 25-26, verified the agency imposes a standard of a preponderance of the evidence or a lower standard of proof when determining whether allegations of sexual abuse or sexual harassment are substantiated.

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Per GCSO PREA Policy, page 26, Reporting to Inmates (e), the policy follows and meets all PREA criteria and the agency is meeting the PREA standards. To date, there have not been any incidents relating to sexual abuse or harassment reported within the GCSO jail facility.

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of GCSO PREA Policy, page 27-Disciplinary Sanctions of Staff, verified the policy clearly indicates 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, are reported to law enforcement agencies (unless the activity was clearly not criminal) and to any relevant licensing bodies, disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories,</p> <p>To date, there have not been any staff from the facility who have violated agency sexual abuse or sexual harassment policies. A review of personnel files verified this, along with interviews with HR and management staff,</p>

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of GCSO PREA Policy, page 27-Corrective Action for Contractors and Volunteers, verified agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies (unless the activity was clearly not criminal) and to relevant licensing bodies. Additionally, agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with inmates. To date, there have not been any contractors or volunteers that have been reported to law enforcement agencies and relevant licensing bodies for engaging in sexual abuse of inmates.</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of GCSO PREA Policy, page 27-28-Disciplinary Sanctions for Inmates, verified inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, and are are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse, inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, and are are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse. To date, there have been "zero" administrative findings of inmate-on-inmate sexual abuse that have occurred at the facility, and "zero" criminal findings of guilt for inmate-on-inmate sexual abuse that have occurred at the facility. Per GCSO PREA Policy, page 27-28, the agency disciplines inmates for sexual conduct with staff only upon finding that the staff member did not consent to such contact. To date, there have not been any incidents of inmates having sexual conduct with staff within the facility. Per GCSO PREA Policy, page 27-28, the agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation.</p>

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.81 (b) is scored as N/A as this is a small jail facility and not considered as a "prison" per PREA standards criteria. Information and compliance with 115.81 (b) sub-standards was verified during the audit process. The jail facility does not employ a mental health practitioner, however, the nurse is assigned as the initial point of contact for inmates to determine if additional mental health resources are appropriate. Per GCSO PREA Policy page 28, the nurse will see all inmates within 14 days of intake. Interviews with the PREA Coordinator and random staff who conduct intake screening verified there were "zero" inmates admitted to the facility who had a history of committing sexual abuse. The facility is meeting the PREA standards and is taking additional steps to fine-tune their tracking system for the screening process. During the onsite audit tour, and a follow-up interview with the nurse, it was verified the nurse maintains the medical/mental health secondary materials that are kept in a secure area.</p> <p>Per GCSO PREA Policy, page 28, any information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners (jail nurse).</p>

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Per GCSO PREA policy, page 29, inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. Additionally, the nature and scope of such services is initially determined by the jail nurse according to her professional judgment. The jail nurse refers anyone who has mental health needs to the county mental health agency, (Community Counseling Solutions) who will respond to the jail facility. The jail nurse and the mental health agency maintain their own confidential records relating to timeliness of emergency medical treatment and crisis intervention services that were provided.</p> <p>A review of GCSO PREA Policy, page 29 verified policy mandates that inmate victims of sexual abuse while incarcerated are 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. An interview with the jail nurse and with appropriate management staff (Sergeant and Under Sheriff) and a review of records verified the facility is compliant with these PREA standards.</p>

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	*There have not been any reports of sexual abuse within the jail facility so no inmates who have reported sexual abuse were available to interview. The GCSO PREA Policies contained on page 29 meets the PREA standards for this section and the jail nurse and random staff and inmates who were interviewed were aware of the policies and procedures available for any PREA incident that may arise.

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>GCSO PREA Policy, page 30, entitled, "Data Collection and Review-Sexual Abuse Incident Reviews" mandates the facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. Currently, there is one investigation involving allegations of inappropriate behavior between a staff member and an inmate. The GCSO PREA policy meets the PREA standards and interviews with the Jail Sergeant (PREA Coordinator) and the Under Sheriff verified the policy will be fully implemented if/when a sexual abuse incident occurs within the facility and when the pending investigation is completed.</p> <p>GCSO PREA Policy, page 30, follows the PREA standards and states the facility ordinarily conducts a sexual abuse incident review within 30 days of the conclusion of the criminal or administrative sexual abuse investigation.</p> <p>GCSO PREA Policy, page 30, follows the PREA standards and states the sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners. Interviews with the GCSO Under Sheriff indicated the incident review team will be comprised of the Jail Sergeant (PREA Coordinator, PREA Investigator), the Grant County Sheriff, the Grant County Under Sheriff, a Deputy, and the Jail Nurse.</p> <p>GCSO PREA Policy, page 30, states the facility prepares a report of its findings from sexual abuse incident reviews including, but not necessarily limited to, determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section and any recommendations for improvement, and submits such report to the facility head and PREA Coordinator.</p>

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A thorough review of the GCSO PREA Policy and interviews with the PREA Coordinator and the Under Sheriff verified the following:</p> <p>GCSO PREA Policy, pages 30-31, follows PREA standards and states the agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. To date there have not been any incidents of sexual abuse reported within the facility, but proper policy and procedures are in place to address and PREA related incidents that may occur.</p> <p>GCSO PREA Policy, pages 30-31, follows PREA standards and states the agency will aggregate the incident-based sexual abuse data at least annually once any incidents of sexual abuse occur.</p> <p>GCSO PREA Policy, pages 30-31 the incident-based data collected will include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.</p> <p>GCSO PREA Policy, pages 30-31, states the agency will maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.</p> <p>GCSO does not contract for the confinement of its inmates. To date, the Department of Justice has not requested data from the facility for the previous calendar year.</p>

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of GCSO PREA Policy, and interviews with the PREA Coordinator and the Under Sheriff verified the following: GCSO PREA Policy, page 31-Data Review for Corrective Action, indicated GCSO will review the data collected and aggregated in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including, Identifying problem areas, taking corrective action on an ongoing basis, and preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole. A review of the most recent Annual Report, 2019 provided to the auditor by the GCSO indicated the have been "zero" incidents of sexual abuse/harassment reports and listed 5 items related to Corrective Actions/Progress in Address Sexual Abuse including: 1. Preparing for 2020 PREA Audit. 2. Continually train staff on PREA standards (monthly). 3 Corrections staff are now wearing body cameras during all contact with inmates (they are turned on when they leave control room). 4. Policy was revised on camera footage and access. 5. Screening forms were revised to streamline notification process.</p> <p>GCSO PREA Policy page 31, states the annual report includes a comparison of the current year's data and corrective actions with those from prior years and the annual report provides and assessment of the agency's progress in addressing sexual abuse.</p> <p>The GCSO annual report will be approved by the Jail Administrator and will be made readily available to the public through its website or other means. This was verified through a review of GCSO PREA Policy, page 31, and through interviews with the Under Sheriff.</p>

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of GCSO PREA Policy, page 31, and interviews with the PREA Coordinator and the Under Sheriff verified the following:</p> <p>GCSO will ensure data collected are securely retained, aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website (GCSO does not currently contract with any other facilities), before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers, and the agency maintains sexual abuse data collected for at least 10 years after the date of initial collection, unless federal, state, or local law requires otherwise.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A PREA audit was conducted during August of 2017 and the final PREA audit report was submitted, 8/29/17, that indicated full compliance with PREA standards. During the onsite audit, the auditor had access to, and the ability to observe, all areas of the audited facility. During the current audit, the agency provided the auditor with copies of any requested documents and information (including electronically stored information). Copies of required documents were attached to the pre-audit questionnaire, and during the onsite audit, the auditors was granted access to personnel files, inmate files, medical records, and any other requested documentation. During the current audit, the agency permitted the auditor to conduct interviews with any inmates that were requested by the auditor. These interviews were conducted via Zoom, due to current Covid 19 polices and safety precautions. GCSO PREA Policy follows the standards. Auditor contact information and an announcement relating to the audit was posted throughout the facility well in advance of the audit and inmates were permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	GCSO PREA Policy states the agency shall ensure that the audit report is published on the agency's website, or is otherwise made readily available to the public. The final PREA audit report from, 8/29/2017, was posted on the agency's website following the audit.

Appendix: Provision Findings		
115.11 (a)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.11 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
115.11 (c)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	na
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	na
115.12 (a)	Contracting with other entities for the confinement of inmates	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na
115.12 (b)	Contracting with other entities for the confinement of inmates	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na
115.13 (a)	Supervision and monitoring	
	Does the facility have a documented staffing plan that provides for	yes

	adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	na
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes

115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes
115.14 (a)	Youthful inmates	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	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, except in exigent circumstances? (N/A if the facility does not have female inmates.)	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 if the facility does not have female inmates.)	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 (N/A if the facility does not have female inmates)?	yes

115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies 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 have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.15 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
115.16 (a)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual	yes

	abuse and sexual harassment, including: inmates who are blind or have low vision?	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes

115.16 (b)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.16 (c)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes

115.17 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether 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?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes

115.17 (h)	Hiring and promotion decisions	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	na
115.18 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	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)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes

115.21 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency 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.)	yes
115.21 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	yes
115.22 (a)	Policies to ensure referrals of allegations for investigations	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes

115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy 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).)	yes
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes

115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes

115.33 (a)	Inmate education	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	Inmate education	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	Inmate education	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	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 receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (b)	Specialized training: Investigations	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	na

115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

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

115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as 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, as 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, as 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 an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.41 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates?	yes

115.42 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.42 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
115.42 (c)	Use of screening information	
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems?	yes

115.42 (d)	Use of screening information	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes
115.42 (e)	Use of screening information	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
115.42 (f)	Use of screening information	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
115.42 (g)	Use of screening information	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	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? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	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? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	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 any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na

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? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	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.	yes

115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes

115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes

115.52 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes

115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	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? (N/A if the facility never has persons detained solely for civil immigration purposes.)	yes
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes

115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.61 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes

115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.63 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes

115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.64 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes

115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes

115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes

115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
115.73 (c)	Reporting to inmates	
	Following an 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 inmate 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 an 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 an 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 an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes

115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.76 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes

115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	Disciplinary sanctions for inmates	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	Disciplinary sanctions for inmates	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	Disciplinary sanctions for inmates	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes

115.78 (f)	Disciplinary sanctions for inmates	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
115.78 (g)	Disciplinary sanctions for inmates	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
115.81 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes

115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
115.82 (a)	Access to emergency medical and mental health services	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes

115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes

115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na
115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes

115.86 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes

115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na
115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.88 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes

115.88 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, 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? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes

115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a “no” response does not impact overall compliance with this standard.)	no
	If this is the second year of the current audit cycle, 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 during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	yes
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403 (f)	Audit contents and findings	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. 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, there has never been a Final Audit Report issued.)	yes