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# PREA Facility Audit Report: Final

**Name of Facility:** Cape May County Correctional Center

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** 01/02/2017

**Date Final Report Submitted:** 03/09/2017

| Auditor Certification   |                                      |
|---|--------------------------------------|
| The contents of this report are accurate to the best of my knowledge.   | <input checked="" type="checkbox"/>  |
| No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.   | <input checked="" type="checkbox"/>  |
| I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template. | <input checked="" type="checkbox"/>  |
| <b>Auditor Full Name as Signed:</b> Gerald Francis Grogan   | <b>Date of Signature:</b> 03/09/2017 |

| AUDITOR INFORMATION                 |                    |
|-------------------------------------|--------------------|
| <b>Auditor name:</b>                | Grogan , Gerald    |
| <b>Address:</b>                     |                    |
| <b>Email:</b>                       | gfgrogan@yahoo.com |
| <b>Telephone number:</b>            |                    |
| <b>Start Date of On-Site Audit:</b> | 12/05/2016         |
| <b>End Date of On-Site Audit:</b>   | 12/07/2016         |

| FACILITY INFORMATION              |  |
|-----------------------------------|--|
| <b>Facility name:</b>             | Cape May County Correctional Center  |
| <b>Facility physical address:</b> | 125 Cerst Haven Road, Cape May Court House,<br>New Jersey - 08210  |
| <b>Facility Phone</b>             |  |
| <b>Facility mailing address:</b>  | 4 Moore Road , Cape May Court House , New<br>Jersey - 08210  |
| <b>The facility is:</b>           | <input checked="" type="radio"/> County<br><input type="radio"/> Federal<br><input type="radio"/> Municipal<br><input type="radio"/> State<br><input type="radio"/> Military<br><input type="radio"/> Private for profit<br><input type="radio"/> Private not for profit |
| <b>Facility Type:</b>             | <input type="radio"/> Prison<br><input checked="" type="radio"/> Jail  |

| Primary Contact       |                             |                          |                            |
|-----------------------|-----------------------------|--------------------------|----------------------------|
| <b>Name:</b>          | Louis Taylor III            | <b>Title:</b>            | PREA Compliance<br>Manager |
| <b>Email Address:</b> | louis.taylor@cmcsheriff.net | <b>Telephone Number:</b> | 609-465-1237               |

| Warden/Superintendent |                                |                              |              |
|-----------------------|--------------------------------|------------------------------|--------------|
| <b>Name:</b>          | Donald Lombardo                | <b>Title:</b>                | Warden       |
| <b>Email Address:</b> | donald.lombardo@cmcsheriff.net | <b>Telephone<br/>Number:</b> | 609-465-1256 |

|                                  |                             |                          |              |
|----------------------------------|-----------------------------|--------------------------|--------------|
| Facility PREA Compliance Manager |                             |                          |              |
| <b>Name:</b>                     | Louis Taylor III            | <b>Title:</b>            | Officer      |
| <b>Email Address:</b>            | louis.taylor@cmcsheriff.net | <b>Telephone Number:</b> | 609-465-1237 |

|                                       |                                      |                          |                              |
|---------------------------------------|--------------------------------------|--------------------------|------------------------------|
| Facility Health Service Administrator |                                      |                          |                              |
| <b>Name:</b>                          | Kristi Siekierski RN                 | <b>Title:</b>            | Health Service Administrator |
| <b>Email Address:</b>                 | ksiekierski@correctcaresolutions.com | <b>Telephone Number:</b> | 609-465-1251                 |

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| Facility Characteristics   |                          |                     |
| <b>Designed facility capacity:</b>   | 188                      |                     |
| <b>Current population of facility:</b>   | 246                      |                     |
| <b>Age Range</b>   | Adults: 18-80            | Youthful Residents: |
| <b>Facility security level/inmate custody levels:</b>  | Minimum/ Medium/ Maximum |                     |
| <b>Number of staff currently employed at the facility who may have contact with inmates:</b> |                          |                     |

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| AGENCY INFORMATION   |  |
| <b>Name of agency:</b>                                       | Cape May County Sheriff's Office                               |
| <b>Governing authority or parent agency (if applicable):</b> |  |
| <b>Physical Address:</b>                                     | 9 North Main Street , Cape May Court House, New Jersey - 08210 |
| <b>Mailing Address:</b>                                      |  |
| <b>Telephone number:</b>                                     |  |

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

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| Agency-Wide PREA Coordinator Information |                               |                          |                       |
| <b>Name:</b>                             | Kourtney Perry                | <b>Title:</b>            | Detective First Class |
| <b>Email Address:</b>                    | kourtney.perry@cmcsheriff.net | <b>Telephone Number:</b> | 609-465-1029          |

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| AUDIT FINDINGS |
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| <p><b>Narrative:</b></p> <p>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.</p> <p>During the pre-audit phase, I reviewed all policies related to PREA. The policies used the same language as the standards. Any policy corrections were noted for corrective action. During the on-site phase, I was given a tour of the entire facility. I observed the intake process, location of the screening instrument, holding cells with TVs that played the PREA education video. I also spoke with intake staff about the screening instrument and followup procedures. I toured the cell blocks. All blocks had Posters with PREA reporting procedures and telephone numbers. Cell blocks had a sleeping area and a separate area for showering and restroom. Other areas of the facility include classroom, laundry, kitchen, medical office. I requested and was given documents that demonstrated compliance with numerous standards, other documents will be provided during the corrective action phase. I was able to interview line staff from all shifts and rotations. Interviews with specialty staff were scheduled in-between inmate interviews and staff interviews. I was able to interview one inmate from each housing area and one inmate whom reported sexual abuse at another facility. The agency is currently under the corrective action phase. The agency was given a copy of the interim report noting areas of "Does not meet." I gave recommendations to the PREA manager to achieve compliance.</p> |
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**Facility Characteristics:**

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

Cape May County Correctional Facility is a small resort town facility. The population is low (240) compared to neighboring facilities. The facility comprises of one hallway with indirect supervision cell blocks located on either side. The jail holds men and women most of whom stated to me that they lived in the area. During the summertime the jail has more people from out of town. The housing units are split into two sections; a sleeping and day area and a separate area for showering and restrooms. The shower and restroom areas have obstructed views from the hallways. Special housing units are linear 2 man cells. There is a private shower area and access to phones. Medical and Mental health is provided by CCS. Food service is provided by ARMARK. The jail offers many educational and religious programs. The facility provides daily recreation.

**Summary of Audit Findings:**

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

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| <b>Number of standards exceeded:</b> | 1  |
| <b>Number of standards met:</b>      | 44 |
| <b>Number of standards not met:</b>  | 0  |

Exceeds standard: 1

Meets standard: : 29

Does not meet standard: 13

A summary of the standards that does not meet include:

115.11 agency plan to implement, prevent and detect sexual abuse. Agency strategy added to policy

118.13 Agency staffing plan

115.17 Hiring, promotion and employee evaluation questions.

115.22 post investigation referral policy on the web site.

115.31 Training documentation (signatures)

115.32 Training documentation (signatures)

115.34 Complete specialized training

115.35 Complete specialized training

115.42 Document how screening decisions are made.

115.64 Reporting and reports

115.71 Investigator training

118.86 Incident review team (format/reporting)

115.401 No audit conducted during the first audit cycle.

## **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.

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| <b>115.11</b> | <b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>   |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | <p>The agency has a written policy that mandates a zero tolerance toward all forms of sexual abuse and sexual harassment in the facility. The policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment. The policy includes sanctions for those found to have participated in prohibited behaviors. The agency has a designated PREA Coordinator as well as a PREA Compliance Manager. The PREA Coordinator reports directly to the Warden or the Executive Undersheriff. The PREA Compliance Manager reports to the Coordinator or the Warden. The PREA coordinator and the PREA compliance manager both have sufficient time and authority to manage all PREA responsibilities. This was determined following interviews with both.</p> <p>(a)-2 SOP1131 does not contain an outline of the implementation process, prevention process or detection. The policy does contain an internal process.<br/>I recommend that the PREA Coordinator prepare a report of the implementation process and add an outline to the policy. The agency SART agreement should be included.</p> <p>(a)-5 The policy has a statement but doesn't describe a strategy.<br/>I recommend adding a strategy to the statement.</p> <p>The agency has now updated their policy; it includes an outline of the implementation process, prevention process, detection process and strategy.<br/>The agency has also attached a copy of the County's SART agreement with the agency.<br/>The agency has now met all of the requirements of the standard.</p> |

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| <b>115.12</b> | <b>Contracting with other entities for the confinement of inmates</b>    |
|               | <b>Auditor Overall Determination:</b> Meets Standard                     |
|               | <b>Auditor Discussion</b>  |
|               | The agency does not contract with any other facilities to house inmates. |

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| <b>115.13</b> | <b>Supervision and monitoring</b>  |
|               | <b>Auditor Overall Determination:</b> Meets Standard   |
|               | <b>Auditor Discussion</b>  |
|               | <p>Agency policy requires that intermediate-level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. These rounds are conducted on all shifts. The policy prohibits staff from alerting other staff of the conduct of such rounds. I reviewed logs documenting supervisor rounds. The rounds covered all shifts. Interviews with staff and supervisors confirmed that staff does not alert others of the rounds.</p> <p>115.13 (a)-1 The Agency needs to complete a staffing plan.<br/>I will provide the PREA Coordinator with a staffing plan tool kit published by NIC as well as provide an example of a completed plan.</p> <p>115.13 (c)-1 A review of the staffing plan should be attached by the review comity.</p> <p>"The agency shall assess, determine, and document whether adjustments are needed to:<br/>(1) The staffing plan established pursuant to paragraph (a) of this section; (2) The facility's deployment of video monitoring systems and other monitoring technologies; and (3) The resources the facility has available to commit to ensure adherence to the staffing plan."</p> <p>During the corrective action phase, the PREA manager created a staffing plan using the "Staffing Plan Tool Kit" from the NIC website. The report contains calculations for staff levels on all shifts and review of the 9 elements required by the standards.<br/>The agency has now met all of the requirements of the standard.</p> |

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| <b>115.14</b> | <b>Youthful inmates</b>   |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | <p>The Agency has a policy to address youthful offenders that complies with the PREA Standards. The Agency reports that they have not held a youthful offender post 2012.</p> |

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| <b>115.15</b> | <b>Limits to cross-gender viewing and searches</b>  |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | <p>The facility does not conduct cross-gender strip or cross-gender visual body cavity searches of inmates, unless its performed by medical staff. The facility does not permit cross-gender pat-down searches of female inmates, absent exigent circumstances. The facility does not restrict female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision. Facility policy requires that all cross-gender strip searches and cross-gender visual body cavity searches be documented on form 711-A and accompanied by a narrative report. Facility policy requires that all cross-gender pat-down searches of female inmates be documented. The documentation must include: Why the search was not postponed, why there was not eligible staff to perform the search, what steps were taken to call eligible staff in, were the steps unsuccessful, was contraband found. The facility has a policy prohibiting staff from searching or physically examining a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. All security staff have been trained on conducting cross-gender pat-down searches and searches of transgender and intersex inmates in a professional and respectful manner. The training material that was used, was developed by the Moss Group and obtained from the PRC website.</p> <p>During the facility tour, I observed male staff announce their presence prior to entering the female housing unit as well as female staff announcing their presence before entering the male housing units. Interviews with inmates confirm these announcements. Staff can view day areas from hallways or by CCTV. Inmates are not allowed to be undressed in this area. Inmates confirm that they only dress in the shower area. The shower and restroom areas are obstructed from common view as well as CCTV.</p> |

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| <b>115.16</b> | <b>Inmates with disabilities and inmates who are limited English proficient</b>  |
|               | <p><b>Auditor Overall Determination:</b> Meets Standard</p>  |
|               | <p><b>Auditor Discussion</b></p>   |
|               | <p>The agency has established procedures to provide disabled inmates 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 by showing the PREA video (developed by the MOSS Group) to all inmates during intake. Providing reading material, displaying posters in hallways, cell blocks and work areas. Medical and Mental Health staff are available to assist mentally challenged inmates. The facility has Spanish speaking officers as well as officers that can sign ASL. The agency also has a language line available. The facility does not use inmate interpreters for PREA related cases. Staff confirms that inmate interpreters are not used.</p> |

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| <b>115.17</b> | <b>Hiring and promotion decisions</b>  |
|               | <p><b>Auditor Overall Determination:</b> Meets Standard</p>  |
|               | <p><b>Auditor Discussion</b></p>   |
|               | <p>Agency policy prohibits hiring or promoting anyone who may have contact with inmates and prohibits enlisting the services of any contractor who may have contact with inmates who have been convicted of any felony. The hiring packet the investigator uses, asks about convictions but does not ask the questions specified by the standards. The agency needs to add those questions. The agency will need to add those questions to promotion documentation as well as yearly evaluations. The agency conducts ongoing criminal background checks for all employees, contractors and volunteers.</p> <p>During the corrective action phase, the agency has revised the hiring packet questions to match the standard. The agency has added an affirmation to their annual employee evaluations and to their promotion acceptance letter.</p> <p>The agency has now met all of the requirements of the standard.</p> |

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| <b>115.18</b> | <b>Upgrades to facilities and technologies</b>  |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | <p>The agency has not had any new construction or modifications.</p> <p>The agency is getting ready for the construction of a new facility. This standard will apply during their next audit.</p> |

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| <b>115.21</b> | <b>Evidence protocol and forensic medical examinations</b>  |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | <p>Administrative sexual abuse investigations are conducted by Internal Affairs. Criminal investigations are conducted by the county Prosecutors Office. The Agency is also a part of the county's SART (Sexual Assault Response Team). All services required by this standard are made available through the SART agreement. The SART agreement provides access to forensic medical examinations free of cost to the victim. (provided at the local hospital by SAFEs, SANEs or FNEs. A victim advocate from a rape crisis center. City and County governments in many states have required prosecutors to form SARTs. These SART agreements put in place a consistent and complete response to any sexual assault case.</p> |

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| <b>115.22</b> | <b>Policies to ensure referrals of allegations for investigations</b>   |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | <p>The agency ensures that an administrative (IA) or criminal investigation (County Prosecutor) is completed for all allegations of sexual abuse and sexual harassment, including inmate-on-inmate sexual abuse and staff sexual misconduct. The agency requires that allegations of sexual abuse be referred for investigation to the Cape May County Prosecutor's Office whom has the legal authority to conduct criminal investigations, The agency's policy regarding the referral of allegations of sexual abuse for criminal investigation is not published on the agency website or made publicly available via other means. The agency documents all referrals of allegations of sexual abuse for criminal investigation.</p> <p>The agency needs to put its referral policy on its website.</p> <p>During the corrective action phase; the agency has posted its referral policy to the website. The agency has now met all of the requirements of this standard</p> |

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| <b>115.31</b> | <b>Employee training</b>  |
|               | <p data-bbox="305 184 917 216"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="305 262 560 294"><b>Auditor Discussion</b></p> <p data-bbox="305 340 1445 867">The agency has trained all employees on the following: 1) Its zero-tolerance policy for sexual abuse and sexual harassment; (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; (3) Inmates' rights to be free from sexual abuse and sexual harassment; (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; (5) The dynamics of sexual abuse and sexual harassment in confinement; (6) The common reactions of sexual abuse and sexual harassment victims; (7) How to detect and respond to signs of threatened and actual sexual abuse; (8) How to avoid inappropriate relationships with inmates; (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates. Training is conducted through classroom and powerpoint instruction. I have reviewed the training material and interviewed the PREA manager who is also the instructor.</p> <p data-bbox="305 926 1360 995">The agency needs to train employees on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.</p> <p data-bbox="305 1010 1388 1121">The agency documents that employees have attended the training however, the agency needs to document that employees understand the training they have received through employee signature or electronic verification.</p> <p data-bbox="305 1178 1442 1331">During the corrective action phase, the agency has trained all employees on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. The agency has also provided a copy of the training with electronic signatures stating that the employee understands the training.</p> <p data-bbox="305 1346 1101 1377">The agency has now met all of the requirements of the standard.</p> |

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| <b>115.32</b> | <b>Volunteer and contractor training</b>  |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | <p>All volunteers and 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. The level and type of training provided to volunteers and contractors is the same training given to all staff. All volunteers and contractors who have contact with inmates have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents. Training records and Interviews conducted confirm that volunteers and contractors have received training and know their response and reporting duties.</p> <p>The agency needs to document that volunteers understand the training.</p> <p>The Agency has now added the the acknowledgement that volunteers and contractors understand the training they have received.</p> |

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| <b>115.33</b> | <b>Inmate education</b>   |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | <p>During the intake process, inmates are given PREA related reading material and required to watch a PREA video (MOSS Group). Inmate PREA education is available in formats accessible to all inmates, including those who are limited English proficient. This is done through Spanish translated reading material, Staff translators or through the use of a language line. Inmates whom are disabled will receive assistance from instructors, medical or mental health staff. The agency also has an officer that signs ASL. Documentation of inmate participation is kept in the inmate's records. The agency also provides PREA information in the inmate Handbook, PREA related posters and reporting instructions and options in all housing units. The determination was made during the facility walk through and inmate interviews.</p> |

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| <b>115.34</b> | <b>Specialized training: Investigations</b>  |
|               | <b>Auditor Overall Determination:</b> Meets Standard   |
|               | <b>Auditor Discussion</b>  |
|               | <p>The Agency investigator needs to complete training on: Conducting sexual abuse investigations in confinement settings.</p> <p>The Agency needs to ask the investigator from the Prosecutor's Office to complete the training.</p> <p>During the corrective action phase; agency investigators have completed the required training (conducting sexual abuse investigations in confinement settings)</p> <p>The agency used the training provided by the National Institute of Corrections.</p> <p>They have also sent a request to the Prosecutor's Office requesting that their investigator complete the training also.</p> |

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| <b>115.35</b> | <b>Specialized training: Medical and mental health care</b>   |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | <p>All medical and mental health staff have received the same training as correctional staff. Medical and Mental health staff need to complete the specialized training required by this standard. I recommend using the training provided on the PREA website using a qualified instructor or completing the training online through NIC.</p> <p>During the corrective action period, medical and mental health staff completed the NIC online courses for specialized training. The PREA manager provided copies of their certificates. The facility has now met the requirements of this standard.</p> |

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| <b>115.41</b> | <b>Screening for risk of victimization and abusiveness</b>  |
|               | <p data-bbox="305 184 917 216"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="305 262 565 294"><b>Auditor Discussion</b></p> <p data-bbox="305 340 1445 913">The agency screens (upon admission to a the facility) for risk of sexual abuse victimization or sexual abusiveness toward other inmates. The risk assessment is conducted using an objective screening instrument. The screening instrument considers the following: (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. Agency policy prohibits disciplining inmates for refusing to answer or for not disclosing complete information. Information collected during screening is given to classification. That information is not shared with staff that are not in the "Need to know."</p> |

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| <b>115.42</b> | <b>Use of screening information</b>  |
|               | <p data-bbox="305 1108 917 1140"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="305 1186 565 1218"><b>Auditor Discussion</b></p> <p data-bbox="305 1264 1396 1459">The classification department uses information from the risk screening to make 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. The facility reports that they have had no transgender or intersex inmates in the last 12 months.</p> <p data-bbox="305 1516 1364 1585">After reviewing the documentation provided, the agency needs to document how each decision was determined.</p> <p data-bbox="305 1642 1421 1711">During the corrective action phase; the agency provided me a report that is created on any inmate who's screening form indicates that some action is required.</p> <p data-bbox="305 1726 1339 1795">The report contains information from a personal interview and recommendations for housing.</p> <p data-bbox="305 1852 1079 1883">The agency now meets all of the requirements of the standard.</p> |

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| <b>115.43</b> | <b>Protective Custody</b>  |
|               | <b>Auditor Overall Determination:</b> Meets Standard   |
|               | <b>Auditor Discussion</b>  |
|               | The agency has a policy prohibiting 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. The agency reports that no inmates were held in involuntary segregation. |

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| <b>115.51</b> | <b>Inmate reporting</b>  |
|               | <b>Auditor Overall Determination:</b> Meets Standard   |
|               | <b>Auditor Discussion</b>  |
|               | The agency has established procedures allowing for multiple internal ways for inmates to report privately to agency officials. They can tell any employee, call IA or the Prosecutor's office directly, submit a request slip. The agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties. Staff are required to document verbal reports immediately or before their shift ends. The agency has established procedures for staff to privately report sexual abuse and sexual harassment of inmates by reporting to IA or calling the County Prosecutor. The staff is informed of this procedure during training. |

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| <b>115.52</b> | <b>Exhaustion of administrative remedies</b>   |
|               | <p data-bbox="305 184 917 216"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="305 262 560 294"><b>Auditor Discussion</b></p> <p data-bbox="305 340 1437 535">Agency policy or procedure allows an inmate to submit a grievance regarding an allegation of sexual abuse at any time, regardless of when the incident is alleged to have occurred. (b)-2 Agency policy conflicts with the standard: The agency shall not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.</p> <p data-bbox="305 550 1404 619">Policy states: An inmate is to use an informal grievance process, (attempt to resolve with staff), an alleged incident of sexual abuse before proceeding to a formal grievance.</p> <p data-bbox="305 634 1388 745">This was policy error was corrected on site. The policy now reads, "An inmate is not required to use an informal grievance process, (attempt to resolve with staff), an alleged incident of sexual abuse before proceeding to a formal grievance.</p> <p data-bbox="305 760 1421 829">The agency's policy and procedure allows an inmate to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint.</p> <p data-bbox="305 844 1453 1165">Decisions on the merits of any grievance or portion of a grievance alleging sexual abuse are made within 90 days of the filing of the grievance. Agency policy and procedure 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 agency has a policy and established procedures for filing an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse. These must be answered within 48 hours and a final agency decision be issued within 5 days.</p> |

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| <b>115.53</b> | <b>Inmate access to outside confidential support services</b>  |
|               | <p data-bbox="305 1358 917 1390"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="305 1436 560 1467"><b>Auditor Discussion</b></p> <p data-bbox="305 1514 1453 1835">The facility provides inmates with access to outside victim advocates for emotional support services related to sexual abuse by providing telephone numbers of agencies and providing access to telephones. The telephones are located in all cell blocks. The inmates are able to use the phones all day and evening till lock down. The inmates are aware that communication with these agencies are not monitored or recorded and these agencies duty to report. The facility maintains a memorandum of understanding with the Coalition Against Rape and Abuse Inc. (CARA). They provide inmates with emotional support services related to sexual abuse. A copy of the MOU was provided for the auditor.</p> |

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| <b>115.54</b> | <b>Third-party reporting</b>  |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | The facility provides a method to receive third-party reports of inmate sexual abuse or sexual harassment through its website or the Cape May Prosecutor's Office. Visitors are given information on how to report. |

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| <b>115.61</b> | <b>Staff and agency reporting duties</b>  |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | The agency 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. To report immediately any retaliation against inmates or staff who reported such an incident or any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Staff does not share information to any one without a need to know. Interviews with line staff, medical staff and the Warden confirms staff knowledge of this policy. |

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| <b>115.62</b> | <b>Agency protection duties</b>   |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | When the facility learns that an inmate is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the inmate by reassigning housing and filing an IA report. Officers interviewed stated that they would immediately remove the inmate from their housing unit and inform their supervisor. |

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| <b>115.63</b> | <b>Reporting to other confinement facilities</b>   |
|               | <p data-bbox="305 184 917 220"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="305 262 560 298"><b>Auditor Discussion</b></p> <p data-bbox="305 340 1437 619">The agency has a policy requiring that, upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility (Warden) must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. The facility reports two occurrences. In each case the Warden contacted the Warden of the other facility. Both cases were investigated. The Case files note when the report was taken, and when the other agency was notified. In both cases, the agency was notified within 72 hours.</p> |

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| <b>115.64</b> | <b>Staff first responder duties</b>  |
|               | <p data-bbox="305 816 917 852"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="305 894 560 930"><b>Auditor Discussion</b></p> <p data-bbox="305 972 1437 1419">The agency has a first responder policy for allegations of sexual abuse. All staff members were able to explain during their interviews that they must: (1) Separate the alleged victim and abuser; (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; (3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and (4) If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.</p> <p data-bbox="305 1430 1448 1545">If the first staff responder is not a security staff member, the responder is required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff.</p> <p data-bbox="305 1598 1448 1755">The agency policy and staff knowledge meet the requirements of the standard. The agency during the corrective action phase is going to provide staff reports for my review (redacting personal information/identifiers). Final determination on compliance will be made after I have reviewed these reports.</p> <p data-bbox="305 1808 1377 1881">After a complete review of case files; I have determined that first responders as well as other staff and investigators have acted and preformed correctly.</p> <p data-bbox="305 1892 943 1927">The agency meets all requirements of the standard.</p> |

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| <b>115.65</b> | <b>Coordinated response</b>   |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | The facility has developed 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. The agency's participation on the SART is also a part of this plan. Interviews with staff, supervisors and the PREA Manager confirms that all parties involved know their responsibilities if an incident occurs. |

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| <b>115.66</b> | <b>Preservation of ability to protect inmates from contact with abusers</b>  |
|               | <b>Auditor Overall Determination:</b> Meets Standard   |
|               | <b>Auditor Discussion</b>  |
|               | I reviewed the collective bargaining agreement (article IV). There is nothing that prohibits or restricts the agency from conducting investigations or retaining information in the employee's personnel file. An interview with the IA investigator and the Warden confirmed compliance with this standard. |

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| <b>115.67</b> | <b>Agency protection against retaliation</b>  |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | The agency has 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. The PREA manager is responsible for monitoring compliance with this standard. The agency/facility monitors the conduct or treatment of inmates or staff who reported sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation by inmates or staff for a period of 90 days. Monitoring will continue beyond 90 days if necessary.<br>The agency reports no cases requiring monitoring. |

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| <b>115.68</b> | <b>Post-allegation protective custody</b>   |
|               | <p data-bbox="305 184 917 220"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="305 262 560 298"><b>Auditor Discussion</b></p> <p data-bbox="305 340 1412 583">The agency has a policy prohibiting 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. If an involuntary segregated housing assignment is made, the facility affords each such inmate a review every 30 days to determine whether there is a continuing need for separation from the general population.</p> <p data-bbox="305 630 1153 665">The agency reports no involuntary segregated housing assignments.</p> |

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| <b>115.71</b> | <b>Criminal and administrative agency investigations</b>   |
|               | <p data-bbox="305 856 917 892"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="305 934 560 970"><b>Auditor Discussion</b></p> <p data-bbox="305 1012 1445 1129">The agency/facility has a policy related to criminal and administrative agency investigations. Internal Affairs investigates all complaints. Criminal complaints are referred to the Cape May County Prosecutor's office. All case files are maintained in the IA office.</p> <p data-bbox="305 1176 1372 1253">The agency will achieve compliance with this standard after investigators complete the specialized training.</p> <p data-bbox="305 1299 1360 1377">Where sexual abuse is alleged, the agency shall use investigators who have received special training in sexual abuse investigations pursuant to § 115.34.</p> <p data-bbox="305 1423 1323 1501">During the corrective action phase; The agency investigator and the prea manager completed the specialized training through the NIC on-line training portal.</p> <p data-bbox="305 1505 1006 1541">The agency now meets all requirements of this standard.</p> <p data-bbox="305 1545 1421 1623">The agency also provided a letter to the County Prosecutor, requesting that they complete the course as well.</p> |

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| <b>115.72</b> | <b>Evidentiary standard for administrative investigations</b>   |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | The IA investigator 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. An interview with the investigator and a review of case files show compliance with this standard. |

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| <b>115.73</b> | <b>Reporting to inmates</b>   |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | <p>The agency has a policy requiring that any inmate who makes an allegation that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation. For criminal investigations, the agency requests the relevant information from the Prosecutor's Office in order to inform the inmate of the outcome of the investigation. Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency subsequently informs the inmate (unless the agency has determined that the allegation is unfounded) whenever:</p> <ul style="list-style-type: none"> <li>• The staff member is no longer posted within the inmate's unit;</li> <li>• The staff member is no longer employed at the facility;</li> <li>• The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or</li> <li>• The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.</li> </ul> <p>Following an inmate's allegation that he or she has been sexually abused by another inmate in an agency facility, the agency subsequently informs the alleged victim whenever:</p> <ul style="list-style-type: none"> <li>• The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or</li> <li>• The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.</li> </ul> <p>These notifications or notated in the inmate's case file.</p> |

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| <b>115.76</b> | <b>Disciplinary sanctions for staff</b>  |
|               | <b>Auditor Overall Determination:</b> Meets Standard   |
|               | <b>Auditor Discussion</b>  |
|               | <p>Staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. The 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. The agency reports no occurrences of staff requiring disciplinary action.</p> <p>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.</p> <p>The agency reports no occurrences of staff terminations related to PREA.</p> <p>An interview with HR confirms no occurrences.</p> |

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| <b>115.77</b> | <b>Corrective action for contractors and volunteers</b>   |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | <p>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. The facility takes appropriate remedial measures and considers whether to prohibit further contact with inmates in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p>The agency reports no violations.</p> <p>An interview with HR confirms no occurrences.</p> |

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| <b>115.78</b> | <b>Disciplinary sanctions for inmates</b>   |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | <p>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. Inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse.</p> <p>If the facility's Mental Health department offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse, the facility considers whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.</p> <p>The agency disciplines inmates for sexual conduct with staff only upon finding that the staff member did not consent to such contact.</p> <p>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> <p>The agency prohibits all sexual activity between inmates. The agency deems such activity to constitute sexual abuse only if it determines that the activity is coerced.</p> |

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| <b>115.81</b> | <b>Medical and mental health screenings; history of sexual abuse</b>   |
|               | <b>Auditor Overall Determination:</b> Exceeds Standard   |
|               | <b>Auditor Discussion</b>  |
|               | <p>All inmates at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.41 are offered a follow-up meeting with a medical or mental health practitioner. An interview with Medical and Mental Health reveals followup interviews occur within 72 hours. Medical and mental health staff maintain secondary materials (e.g., form, log) documenting compliance with the above required services. After review of case records, I found that most cases are reviewed in 24 hours. Information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners. 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.</p> <p>An interview with Medical and Mental Health staff confirmed compliance with this standard. All medical records are secured in the medical office.</p> |

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| <b>115.82</b> | <b>Access to emergency medical and mental health services</b>   |
|               | <p data-bbox="305 184 917 220"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="305 262 560 298"><b>Auditor Discussion</b></p> <p data-bbox="305 340 1437 535">Inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. These services are provided through the SART agreement. Medical treatment is done through the local hospital and crisis intervention services are provided through CARA. Medical and Mental Health staff determine the nature and scope of such services according to their professional judgment.</p> <p data-bbox="305 546 1453 661">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.</p> <p data-bbox="305 672 1437 787">Treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> |

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| <b>115.83</b> | <b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>  |
|               | <p data-bbox="305 1031 917 1066"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="305 1108 560 1144"><b>Auditor Discussion</b></p> <p data-bbox="305 1186 1453 1549">The facility offers 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. Female victims of sexual abusive vaginal penetration while incarcerated are offered pregnancy tests. If pregnancy results from sexual abuse while incarcerated, victims receive timely and comprehensive information about, and timely access to, all lawful pregnancy-related medical services. Inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. Treatment services are 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.</p> <p data-bbox="305 1560 1356 1633">Interviews with Medical and Mental health staff, The PREA Manager and the Warden confirm the services provided.</p> |

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| <b>115.86</b> | <b>Sexual abuse incident reviews</b>  |
|               | <p data-bbox="305 184 917 220"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="305 262 560 298"><b>Auditor Discussion</b></p> <p data-bbox="305 340 1437 499">The facility has not had to conduct a sexual abuse incident review. The policy specifies that at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded, they will conduct a sexual abuse incident review within 30 days.</p> <p data-bbox="305 550 1364 709">Because the facility has not had the need to conduct an incident review; I recommend attaching a document or form that outlines the review team process. The form should contain all elements required by the standard (115.86 (d), 115.86 (e)-1)<br/>This will insure that the proper format and considerations are completed.</p> <p data-bbox="305 760 1445 835">The agency has created a standardized form that will be used to conduct an incident review. The report format contains all elements required by the standard (115.86 (d), 115.86 (e)-1).</p> |

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| <b>115.87</b> | <b>Data collection</b>   |
|               | <p data-bbox="305 1024 917 1060"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="305 1102 560 1138"><b>Auditor Discussion</b></p> <p data-bbox="305 1180 1429 1465">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. The agency aggregates the incident-based sexual abuse data at least annually. The data includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice. The agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.</p> |

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| <b>115.88</b> | <b>Data review for corrective action</b>  |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | The Warden reviews data collected and aggregated pursuant to §115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including: <ul style="list-style-type: none"> <li>• Identifying problem areas;</li> <li>• Taking corrective action on an ongoing basis; and</li> <li>• 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.</li> </ul> |

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| <b>115.89</b> | <b>Data storage, publication, and destruction</b>   |
|               | <b>Auditor Overall Determination:</b> Meets Standard  |
|               | <b>Auditor Discussion</b>   |
|               | The agency has published its sexual abuse data to its website. The agency maintains sexual abuse data collected pursuant to §115.87 for at least 10 years after the date of initial collection, unless federal, state, or local law requires otherwise. |

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| <b>115.401</b> | <b>Frequency and scope of audits</b>  |
|                | <b>Auditor Overall Determination:</b> Meets Standard  |
|                | <b>Auditor Discussion</b>   |
|                | The agency did not have an audit during the first audit cycle. To achieve compliance with this standard, the agency will provide a report that will discuss the agency's plans for future audits during the upcoming years. |
|                | During the corrective action phase; the PREA Manager provided me a letter confirming on going intentions to comply with the PREA standards and on going audits.   |

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| <b>115.403</b> | <b>Audit contents and findings</b>                   |
|                | <b>Auditor Overall Determination:</b> Meets Standard |
|                | <b>Auditor Discussion</b>                            |
|                | The agency has not had a prior audit.                |



Appendix: Provision Findings

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| <b>115.11 (a)</b> | <b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>   |     |
|                   | Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?                | yes |
|                   | Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment? | yes |

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| <b>115.11 (b)</b> | <b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>  |     |
|                   | Has the agency employed or designated an agency-wide PREA Coordinator?   | yes |
|                   | Is the PREA Coordinator position in the upper-level of the agency hierarchy?   | yes |
|                   | Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities? | yes |

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| <b>115.11 (c)</b> | <b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>   |     |
|                   | If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)                                     | na  |
|                   | Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.) | yes |

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| <b>115.12 (a)</b> | <b>Contracting with other entities for the confinement of inmates</b>   |    |
|                   | If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.) | na |

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| <b>115.12 (b)</b> | <b>Contracting with other entities for the confinement of inmates</b>  |    |
|                   | Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates OR the response to 115.12(a)-1 is "NO".) | na |



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| <b>115.13 (a)</b> | <b>Supervision and monitoring</b> |
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| <b>115.13 (a)</b> | <b>Supervision and monitoring</b>   |     |
|                   | Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?   | yes |
|                   | Does the agency ensure that each facility has documented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?  | yes |
|                   | Does the agency ensure that each facility's staffing plan takes into consideration the generally accepted detention and correctional practices in calculating adequate staffing levels and determining the need for video monitoring?   | yes |
|                   | Does the agency ensure that each facility's staffing plan takes into consideration any judicial findings of inadequacy in calculating adequate staffing levels and determining the need for video monitoring?   | yes |
|                   | Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from Federal investigative agencies in calculating adequate staffing levels and determining the need for video monitoring?  | yes |
|                   | Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from internal or external oversight bodies in calculating adequate staffing levels and determining the need for video monitoring?   | yes |
|                   | Does the agency ensure that each facility's staffing plan takes into consideration all components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated) in calculating adequate staffing levels and determining the need for video monitoring? | yes |
|                   | Does the agency ensure that each facility's staffing plan takes into consideration the composition of the inmate population in calculating adequate staffing levels and determining the need for video monitoring?  | yes |
|                   | Does the agency ensure that each facility's staffing plan takes into consideration the number and placement of supervisory staff in calculating adequate staffing levels and determining the need for video monitoring?   | yes |
|                   |   | yes |

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| <b>115.13 (a)</b> | <b>Supervision and monitoring</b>   |     |
|                   | Does the agency ensure that each facility's staffing plan takes into consideration the institution programs occurring on a particular shift in calculating adequate staffing levels and determining the need for video monitoring?                      |     |
|                   | Does the agency ensure that each facility's staffing plan takes into consideration any applicable State or local laws, regulations, or standards in calculating adequate staffing levels and determining the need for video monitoring?                 | yes |
|                   | Does the agency ensure that each facility's staffing plan takes into consideration the prevalence of substantiated and unsubstantiated incidents of sexual abuse in calculating adequate staffing levels and determining the need for video monitoring? | yes |
|                   | Does the agency ensure that each facility's staffing plan takes into consideration any other relevant factors in calculating adequate staffing levels and determining the need for video monitoring ?   | yes |

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

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| <b>115.13 (c)</b> | <b>Supervision and monitoring</b>   |     |
|                   | In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?                     | 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 |

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

|                   |   |    |
|-------------------|---|----|
| <b>115.14 (a)</b> | <b>Youthful inmates</b>   |    |
|                   | 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 |

|                   |  |    |
|-------------------|--|----|
| <b>115.14 (b)</b> | <b>Youthful inmates</b>  |    |
|                   | 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 |

|                   |  |    |
|-------------------|--|----|
| <b>115.14 (c)</b> | <b>Youthful inmates</b>  |    |
|                   | 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 |

|                   |   |     |
|-------------------|---|-----|
| <b>115.15 (a)</b> | <b>Limits to cross-gender viewing and searches</b>  |     |
|                   | 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 |

|                   |   |     |
|-------------------|---|-----|
| <b>115.15 (b)</b> | <b>Limits to cross-gender viewing and searches</b>  |     |
|                   | Does the facility always refrain from conducting cross-gender pat-down searches of female inmates in non-exigent circumstances? (N/A here for facilities with less than 50 inmates before August 20,2017.)  | yes |
|                   | Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A here for facilities with less than 50 inmates before August 20,2017.) | no  |

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.15 (d)</b> | <b>Limits to cross-gender viewing and searches</b>  |     |
|                   | Does the facility implement a policy and practice that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks? | yes |
|                   | Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?   | yes |

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

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



|                   |   |
|-------------------|---|
| <b>115.16 (a)</b> | <b>Inmates with disabilities and inmates who are limited English proficient</b> |
|-------------------|---|

| 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 abuse and sexual harassment, including: inmates who are blind or have low vision?                          | 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 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 |
|            |  | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.16 (a)</b> | <b>Inmates with disabilities and inmates who are limited English proficient</b>  |     |
|                   | 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? |     |
|                   | 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 |

|                   |   |     |
|-------------------|---|-----|
| <b>115.16 (b)</b> | <b>Inmates with disabilities and inmates who are limited English proficient</b>   |     |
|                   | Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient? | yes |
|                   | Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?                                      | yes |

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.17 (a)</b> | <b>Hiring and promotion decisions</b>   |     |
|                   | Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?   | yes |
|                   | Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?            | yes |
|                   | Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?   | yes |
|                   | Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?  | yes |
|                   | Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? | yes |
|                   | Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?  | yes |

|                   |   |     |
|-------------------|---|-----|
| <b>115.17 (b)</b> | <b>Hiring and promotion decisions</b>   |     |
|                   | Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates? | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.17 (c)</b> | <b>Hiring and promotion decisions</b>  |     |
|                   | 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 |

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|-------------------|--|-----|
| <b>115.17 (d)</b> | <b>Hiring and promotion decisions</b>  |     |
|                   | Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates? | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.17 (e)</b> | <b>Hiring and promotion decisions</b>  |     |
|                   | 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 |

|                   |   |     |
|-------------------|---|-----|
| <b>115.17 (f)</b> | <b>Hiring and promotion decisions</b>   |     |
|                   | 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 |

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

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

|                   |   |    |
|-------------------|---|----|
| <b>115.18 (a)</b> | <b>Upgrades to facilities and technologies</b>  |    |
|                   | If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.) | na |

|                   |   |    |
|-------------------|---|----|
| <b>115.18 (b)</b> | <b>Upgrades to facilities and technologies</b>  |    |
|                   | If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.) | na |

|                   |   |     |
|-------------------|---|-----|
| <b>115.21 (a)</b> | <b>Evidence protocol and forensic medical examinations</b>  |     |
|                   | If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) | yes |

|                   |  |    |
|-------------------|--|----|
| <b>115.21 (b)</b> | <b>Evidence protocol and forensic medical examinations</b>   |    |
|                   | Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)  | na |
|                   | Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) | na |

|                   |   |     |
|-------------------|---|-----|
| <b>115.21 (c)</b> | <b>Evidence protocol and forensic medical examinations</b>  |     |
|                   | Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate? | yes |
|                   | Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?  | yes |
|                   | If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?      | yes |
|                   | Has the agency documented its efforts to provide SAFEs or SANEs?  | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.21 (d)</b> | <b>Evidence protocol and forensic medical examinations</b>   |     |
|                   | Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?   | yes |
|                   | If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? | yes |
|                   | Has the agency documented its efforts to secure services from rape crisis centers?   | yes |

|                   |   |     |
|-------------------|---|-----|
| <b>115.21 (e)</b> | <b>Evidence protocol and forensic medical examinations</b>  |     |
|                   | As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews? | yes |
|                   | As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?  | yes |

|                   |  |    |
|-------------------|--|----|
| <b>115.21 (f)</b> | <b>Evidence protocol and forensic medical examinations</b>   |    |
|                   | If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.) | no |

|                   |   |    |
|-------------------|---|----|
| <b>115.21 (h)</b> | <b>Evidence protocol and forensic medical examinations</b>  |    |
|                   | If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.21(d) above.) | na |

|                   |   |     |
|-------------------|---|-----|
| <b>115.22 (a)</b> | <b>Policies to ensure referrals of allegations for investigations</b>   |     |
|                   | Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?      | yes |
|                   | Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment? | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.22 (b)</b> | <b>Policies to ensure referrals of allegations for investigations</b>  |     |
|                   | Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior? | yes |
|                   | Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?  | yes |
|                   | Does the agency document all such referrals?   | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.22 (c)</b> | <b>Policies to ensure referrals of allegations for investigations</b>  |     |
|                   | If a separate entity is responsible for conducting criminal investigations, does such publication describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).) | yes |

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

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

|                   |  |     |
|-------------------|--|-----|
| <b>115.31 (c)</b> | <b>Employee training</b>   |     |
|                   | Have all current employees who may have contact with inmates received such training?   | yes |
|                   | Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures? | yes |
|                   | In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?                         | yes |

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

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.32 (b)</b> | <b>Volunteer and contractor training</b>  |     |
|                   | Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)? | yes |

|                   |   |    |
|-------------------|---|----|
| <b>115.32 (c)</b> | <b>Volunteer and contractor training</b>  |    |
|                   | Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received? | no |

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

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

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.33 (d)</b> | <b>Inmate education</b>   |     |
|                   | 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 |

|                   |   |     |
|-------------------|---|-----|
| <b>115.33 (e)</b> | <b>Inmate education</b>   |     |
|                   | Does the agency maintain documentation of inmate participation in these education sessions? | yes |

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|-------------------|---|-----|
| <b>115.33 (f)</b> | <b>Inmate education</b>   |     |
|                   | 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 |

|                   |   |     |
|-------------------|---|-----|
| <b>115.34 (a)</b> | <b>Specialized training: Investigations</b>   |     |
|                   | In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) | yes |

|                   |   |     |
|-------------------|---|-----|
| <b>115.34 (b)</b> | <b>Specialized training: Investigations</b>   |     |
|                   | Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)  | yes |
|                   | Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)  | yes |
|                   | Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)  | yes |
|                   | Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.34 (c)</b> | <b>Specialized training: Investigations</b>  |     |
|                   | Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) | yes |

|                   |  |    |
|-------------------|--|----|
| <b>115.35 (a)</b> | <b>Specialized training: Medical and mental health care</b>  |    |
|                   | Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment?                           | no |
|                   | 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?  | no |
|                   | 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? | no |
|                   | 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?      | no |

|                   |  |    |
|-------------------|--|----|
| <b>115.35 (b)</b> | <b>Specialized training: Medical and mental health care</b>  |    |
|                   | If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams.) | na |

|                   |   |    |
|-------------------|---|----|
| <b>115.35 (c)</b> | <b>Specialized training: Medical and mental health care</b>   |    |
|                   | Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? | no |

|                   |   |     |
|-------------------|---|-----|
| <b>115.35 (d)</b> | <b>Specialized training: Medical and mental health care</b>   |     |
|                   | Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31?   | yes |
|                   | Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? | yes |

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

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

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|-------------------|---|-----|
| <b>115.41 (c)</b> | <b>Screening for risk of victimization and abusiveness</b>                            |     |
|                   | Are all PREA screening assessments conducted using an objective screening instrument? | yes |



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

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

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

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

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

|                   |  |     |
|-------------------|--|-----|
| <b>115.41 (i)</b> | <b>Screening for risk of victimization and abusiveness</b>   |     |
|                   | Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates? | yes |

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

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

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|-------------------|--|-----|
| <b>115.42 (c)</b> | <b>Use of screening information</b>  |     |
|                   | 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 |

|                   |  |     |
|-------------------|--|-----|
| <b>115.42 (d)</b> | <b>Use of screening information</b>  |     |
|                   | 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 |

|                   |   |     |
|-------------------|---|-----|
| <b>115.42 (e)</b> | <b>Use of screening information</b>   |     |
|                   | 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 |

|                   |   |     |
|-------------------|---|-----|
| <b>115.42 (f)</b> | <b>Use of screening information</b>   |     |
|                   | Are transgender and intersex inmates given the opportunity to shower separately from other inmates? | yes |

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

| <b>115.43 (a)</b> | <b>Protective Custody</b>   |     |
|-------------------|---|-----|
|                   | 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 |

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

| <b>115.43 (c)</b> | <b>Protective Custody</b>  |     |
|-------------------|--|-----|
|                   | 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 |

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|-------------------|---|-----|
| <b>115.43 (d)</b> | <b>Protective Custody</b>   |     |
|                   | 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 |

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|-------------------|---|-----|
| <b>115.43 (e)</b> | <b>Protective Custody</b>   |     |
|                   | 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 |

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|-------------------|---|-----|
| <b>115.51 (a)</b> | <b>Inmate reporting</b>   |     |
|                   | 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 |

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| <b>115.51 (b)</b> | <b>Inmate reporting</b>  |     |
|                   | Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?                | yes |
|                   | Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?   | yes |
|                   | Does that private entity or office allow the inmate to remain anonymous upon request?  | yes |
|                   | Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? | yes |

|                   |   |     |
|-------------------|---|-----|
| <b>115.51 (c)</b> | <b>Inmate reporting</b>   |     |
|                   | 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 |

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

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|-------------------|--|----|
| <b>115.52 (a)</b> | <b>Exhaustion of administrative remedies</b>   |    |
|                   | Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse. | no |

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|-------------------|---|-----|
| <b>115.52 (b)</b> | <b>Exhaustion of administrative remedies</b>  |     |
|                   | 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 |

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| <b>115.52 (c)</b> | <b>Exhaustion of administrative remedies</b>  |     |
|                   | 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) | <b>Exhaustion of administrative remedies</b>  |     |
|------------|---|-----|
|            | 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) | <b>Exhaustion of administrative remedies</b>   |     |
|------------|--|-----|
|            | 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 |

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| <b>115.52 (f)</b> | <b>Exhaustion of administrative remedies</b>   |     |
|                   | 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 |

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|-------------------|--|-----|
| <b>115.52 (g)</b> | <b>Exhaustion of administrative remedies</b>   |     |
|                   | 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 |

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| <b>115.53 (a)</b> | <b>Inmate access to outside confidential support services</b>   |     |
|                   | Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations? | yes |
|                   | Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies?   | yes |
|                   | Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?  | yes |

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|-------------------|--|-----|
| <b>115.53 (b)</b> | <b>Inmate access to outside confidential support services</b>  |     |
|                   | Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws? | yes |

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|-------------------|--|-----|
| <b>115.53 (c)</b> | <b>Inmate access to outside confidential support services</b>  |     |
|                   | Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse? | yes |
|                   | Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?   | yes |

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| <b>115.54 (a)</b> | <b>Third-party reporting</b>  |     |
|                   | Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?                   | yes |
|                   | Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate? | yes |

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|-------------------|--|-----|
| <b>115.61 (a)</b> | <b>Staff and agency reporting duties</b>   |     |
|                   | 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 |

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

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

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

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| <b>115.61 (e)</b> | <b>Staff and agency reporting duties</b>   |     |
|                   | Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators? | yes |

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

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| <b>115.63 (a)</b> | <b>Reporting to other confinement facilities</b>   |     |
|                   | Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred? | yes |

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

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

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| <b>115.63 (d)</b> | <b>Reporting to other confinement facilities</b>   |     |
|                   | Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards? | yes |

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| <b>115.64 (a)</b> | <b>Staff first responder duties</b>   |     |
|                   | Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?   | yes |
|                   | Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?  | yes |
|                   | Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?     | yes |
|                   | Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? | yes |

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|-------------------|--|-----|
| <b>115.64 (b)</b> | <b>Staff first responder duties</b>  |     |
|                   | If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff? | yes |

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|-------------------|---|-----|
| <b>115.65 (a)</b> | <b>Coordinated response</b>   |     |
|                   | Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse? | yes |

|                   |   |     |
|-------------------|---|-----|
| <b>115.66 (a)</b> | <b>Preservation of ability to protect inmates from contact with abusers</b>   |     |
|                   | Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted? | yes |

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

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

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

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.67 (e)</b> | <b>Agency protection against retaliation</b>  |     |
|                   | If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation? | yes |

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

|                   |  |     |
|-------------------|--|-----|
| <b>115.71 (a)</b> | <b>Criminal and administrative agency investigations</b>   |     |
|                   | When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).) | yes |
|                   | Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)  | yes |

|                   |   |    |
|-------------------|---|----|
| <b>115.71 (b)</b> | <b>Criminal and administrative agency investigations</b>  |    |
|                   | Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34? | no |

|                   |  |     |
|-------------------|--|-----|
| <b>115.71 (c)</b> | <b>Criminal and administrative agency investigations</b>   |     |
|                   | Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data? | yes |
|                   | Do investigators interview alleged victims, suspected perpetrators, and witnesses?   | yes |
|                   | Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?  | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.71 (d)</b> | <b>Criminal and administrative agency investigations</b>   |     |
|                   | When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution? | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.71 (e)</b> | <b>Criminal and administrative agency investigations</b>   |     |
|                   | Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?                           | yes |
|                   | Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding? | yes |

|                   |   |     |
|-------------------|---|-----|
| <b>115.71 (f)</b> | <b>Criminal and administrative agency investigations</b>  |     |
|                   | Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?  | yes |
|                   | Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings? | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.71 (g)</b> | <b>Criminal and administrative agency investigations</b>   |     |
|                   | Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible? | yes |

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

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

|                   |  |     |
|-------------------|--|-----|
| <b>115.71 (j)</b> | <b>Criminal and administrative agency investigations</b>   |     |
|                   | Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation? | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.71 (l)</b> | <b>Criminal and administrative agency investigations</b>   |     |
|                   | When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).) | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.72 (a)</b> | <b>Evidentiary standard for administrative investigations</b>  |     |
|                   | Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated? | yes |

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.73 (b)</b> | <b>Reporting to inmates</b>   |     |
|                   | If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.) | yes |

| <b>115.73 (c)</b> | <b>Reporting to inmates</b>   |     |
|-------------------|---|-----|
|                   | Following a inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?  | yes |
|                   | Following a inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?   | yes |
|                   | Following a inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?      | yes |
|                   | Following a inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility? | yes |

| <b>115.73 (d)</b> | <b>Reporting to inmates</b>  |     |
|-------------------|--|-----|
|                   | Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?  | yes |
|                   | Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility? | yes |

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

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

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.76 (c)</b> | <b>Disciplinary sanctions for staff</b>   |     |
|                   | Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories? | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.76 (d)</b> | <b>Disciplinary sanctions for staff</b>  |     |
|                   | Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)? | yes |
|                   | Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?  | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.77 (a)</b> | <b>Corrective action for contractors and volunteers</b>  |     |
|                   | Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?   | yes |
|                   | Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)? | yes |
|                   | Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?   | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.77 (b)</b> | <b>Corrective action for contractors and volunteers</b>  |     |
|                   | In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates? | yes |

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

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

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.78 (d)</b> | <b>Disciplinary sanctions for inmates</b>   |     |
|                   | If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits? | yes |

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.78 (f)</b> | <b>Disciplinary sanctions for inmates</b>   |     |
|                   | For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation? | yes |

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

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

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

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.81 (d)</b> | <b>Medical and mental health screenings; history of sexual abuse</b>  |     |
|                   | Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law? | yes |

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.82 (a)</b> | <b>Access to emergency medical and mental health services</b>   |     |
|                   | Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment? | yes |

|                   |   |     |
|-------------------|---|-----|
| <b>115.82 (b)</b> | <b>Access to emergency medical and mental health services</b>   |     |
|                   | If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62? | yes |
|                   | Do security staff first responders immediately notify the appropriate medical and mental health practitioners?  | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.82 (c)</b> | <b>Access to emergency medical and mental health services</b>  |     |
|                   | Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate? | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.82 (d)</b> | <b>Access to emergency medical and mental health services</b>  |     |
|                   | Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident? | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.83 (a)</b> | <b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>   |     |
|                   | Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility? | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.83 (b)</b> | <b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>   |     |
|                   | Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody? | yes |

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

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.83 (e)</b> | <b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>  |     |
|                   | If pregnancy results from the conduct described in paragraph § 115.83 (d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if all-male facility.) | yes |

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

|                   |  |     |
|-------------------|--|-----|
| <b>115.83 (g)</b> | <b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>   |     |
|                   | Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident? | yes |

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.86 (a)</b> | <b>Sexual abuse incident reviews</b>  |     |
|                   | Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded? | yes |

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.86 (c)</b> | <b>Sexual abuse incident reviews</b>  |     |
|                   | Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners? | yes |

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

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

|                   |  |     |
|-------------------|--|-----|
| <b>115.87 (a)</b> | <b>Data collection</b>   |     |
|                   | Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions? | yes |

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

|                   |  |     |
|-------------------|--|-----|
| <b>115.87 (c)</b> | <b>Data collection</b>   |     |
|                   | Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice? | yes |

|                   |  |     |
|-------------------|--|-----|
| <b>115.87 (d)</b> | <b>Data collection</b>   |     |
|                   | Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews? | yes |

|                   |  |    |
|-------------------|--|----|
| <b>115.87 (e)</b> | <b>Data collection</b>   |    |
|                   | Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.) | na |

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

|                   |  |     |
|-------------------|--|-----|
| <b>115.88 (a)</b> | <b>Data review for corrective action</b>   |     |
|                   | Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?   | yes |
|                   | Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?  | yes |
|                   | Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole? | yes |

|                   |   |    |
|-------------------|---|----|
| <b>115.88 (b)</b> | <b>Data review for corrective action</b>  |    |
|                   | Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse? | no |

|                   |  |     |
|-------------------|--|-----|
| <b>115.88 (c)</b> | <b>Data review for corrective action</b>   |     |
|                   | Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means? | yes |

|                   |   |     |
|-------------------|---|-----|
| <b>115.88 (d)</b> | <b>Data review for corrective action</b>  |     |
|                   | Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility? | yes |

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

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

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

|                   |   |     |
|-------------------|---|-----|
| <b>115.89 (d)</b> | <b>Data storage, publication, and destruction</b>   |     |
|                   | Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise? | yes |

|                    |  |    |
|--------------------|--|----|
| <b>115.401 (a)</b> | <b>Frequency and scope of audits</b>   |    |
|                    | During the three-year period starting on August 20, 2013, and during each three-year period thereafter, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once.? (N/A before August 20, 2016.) | no |

|                    |   |    |
|--------------------|---|----|
| <b>115.401 (b)</b> | <b>Frequency and scope of audits</b>  |    |
|                    | During each one-year period starting on August 20, 2013, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited? | no |

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

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

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

|                    |   |     |
|--------------------|---|-----|
| <b>115.401 (n)</b> | <b>Frequency and scope of audits</b>  |     |
|                    | Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel? | yes |

|                    |  |    |
|--------------------|--|----|
| <b>115.403 (f)</b> | <b>Audit contents and findings</b>   |    |
|                    | The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports within 90 days of issuance by auditor. The review period is for prior audits completed during the past three years PRECEDING THIS AGENCY AUDIT. In the case of single facility agencies, the auditor shall ensure that the facility's last audit report was published. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or in the case of single facility agencies that there has never been a Final Audit Report issued.) | na |