

# PREA Facility Audit Report: Final

**Name of Facility:** Jasper County Jail

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** 06/07/2018

**Date Final Report Submitted:** 11/30/2018

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> Kevin Boldt	<b>Date of Signature:</b> 11/30/2018

AUDITOR INFORMATION	
<b>Auditor name:</b>	Boldt, Kevin
<b>Address:</b>	
<b>Email:</b>	kboldtllc@gmail.com
<b>Telephone number:</b>	
<b>Start Date of On-Site Audit:</b>	04/24/2018
<b>End Date of On-Site Audit:</b>	04/26/2018

FACILITY INFORMATION	
<b>Facility name:</b>	Jasper County Jail
<b>Facility physical address:</b>	2300 Law Center Drive, Newton, Iowa - 50208
<b>Facility Phone</b>	641-791-7081
<b>Facility mailing address:</b>	
<b>The facility is:</b>	<input checked="" type="radio"/> County <input type="radio"/> Federal <input type="radio"/> Municipal <input type="radio"/> State <input type="radio"/> Military <input type="radio"/> Private for profit <input type="radio"/> Private not for profit
<b>Facility Type:</b>	<input type="radio"/> Prison <input checked="" type="radio"/> Jail

Primary Contact			
<b>Name:</b>	Wendy Hecox	<b>Title:</b>	Chief Jailer
<b>Email Address:</b>	whecox@jaspersheriff.org	<b>Telephone Number:</b>	641-791-7081

Warden/Superintendent			
<b>Name:</b>	Wendy Hecox	<b>Title:</b>	Chief Jailer
<b>Email Address:</b>	whecox@jaspersheriff.org	<b>Telephone Number:</b>	641-791-7081

Facility PREA Compliance Manager			
<b>Name:</b>		<b>Email Address:</b>	

Facility Health Service Administrator			
<b>Name:</b>	Wendy Hecox	<b>Title:</b>	Chief Jailer
<b>Email Address:</b>	whecox@jaspersheriff.org	<b>Telephone Number:</b>	641-791-7081

Facility Characteristics		
<b>Designed facility capacity:</b>	84	
<b>Current population of facility:</b>	59	
<b>Age Range</b>	Adults: 18-82	Youthful Residents: 17
<b>Facility security level/inmate custody levels:</b>	5 levels	
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	16	

## AUDIT FINDINGS

### **Narrative:**

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

The Jasper County Jail Chief Jailer Wendy Hecox contacted this auditor for an audit in the spring of 2018. A date of April 24-25, 2018 was agreed upon and a contract was signed and delivered on 12-19-17. The On Line Audit System was applied for and accessed on 12-18-17, Chief Jailer Hecox was instructed on how to begin the Pre-audit questionnaire and to contact this auditor if there were any questions.

On 03-06-18 a copy of the PREA Audit visit posting was sent to the Jasper County Jail for posting on or before 03-12-18. The information was posted on 03-06-18 and a photo was taken of the posting and sent to this auditor for records.

On 03-09-18 a confirmation was received that the Pre-audit questionnaire and accompanying documents were ready for review on the On Line Audit System.

Information reviewed included the Pre-Audit Questionnaire, agency policies, procedures, forms, education materials, training documentation, organizational charts, posters, brochures, Jasper County Sheriff and Jail web site and other PREA related materials that were provided to demonstrate compliance with the PREA standards.

On Monday 04-09-18 an e-mail was sent to Chief Jailer Hecox with a list of items needed upon arrival for review, this list included: Staff Schedule, PREA Postings, Current Inmate Roster, Staff Training Files, Staff Personnel Files, Inmate Files, Medical Files, Contractor/Volunteer Training Forms and Background Checks, PREA Reporting Files, Policy Updates, Jail Rule Book, Unannounced Rounds Documentation, State Jail Inspection Report, and a note there would be more items requested during the audit tour. This e-mail list also contained an itinerary for the on site audit which included interviews with staff, inmates, investigators and administration. A meeting with the Sheriff, Chief Deputy and Chief Jailer was requested for 0800 on 04-24-18 to answer any questions they may have and to explain the audit process while at the facility.

This auditor visited the JCJF on the evening of 04-23-18 and entered the public lobby to review any postings and information available to the public. There were several postings of Domestic Abuse Services and Sexual Assault Services information available in the lobby to the public.

On 04-24-18 this auditor was met by Chief Jailer Wendy Hecox, upon confirming my identity, I was given access to the facility and introduced to Sheriff John Halferty and Chief Deputy Duane Rozendahl. I was escorted to a conference room in the Sheriff's Office where the informational meeting was held with these administrators.

Sheriff Halferty, Chief Deputy Rozendahl and Chief Jailer Hecox were all explained the review of information received through the Pre-audit questionnaire and some of the findings at this point. It was explained that not all information was obtained and the on site audit and review of information would

assist with a better understanding of corrective actions.

It was learned that Sheriff Halferty was the newly elected Sheriff having been the Chief Deputy under the former administration. Sheriff Halferty hired Rozendahl as Chief Deputy upon taking office. The Sheriff had some knowledge of the PREA Standards and assigned Chief Jailer Hecox to implement policy and training to become compliant with PREA Standards. Chief Jailer Hecox has been working on this assignment and has completed a tremendous amount of work and training to get to this point. It was also learned there has been an extensive amount of updating of the Jasper County Sheriff's Office Policy and Procedure Manual.

The group was told that based on the policy as written to meet PREA Standards, there would need to have several more items addressed and changed from what was currently written. All three administrators were aware of possible shortcomings of the current policy and it was explained that due to the many areas that needed changed, the most informative way to update this would be to use the PREA Standards as a template for a revised policy. All information would be available in the updated policy manual and staff could review areas as situations arose. All three understood and were agreeable to this revision with the understanding that there was a time limit we had to work with, policy would need to be revised, reviewed, implemented, trained and practiced. This would all need to be reviewed and confirmed in time for the final report to be issued. This would be a priority for the Jasper County Sheriff's Administration.

The administrators were also advised that a minimum of 16 inmates would be interviewed, the audit would go into three days on site instead of the previously anticipated two days.

I was given access to the conference room for the duration of the audit, this conference room was to be used for staff interviews.

The on site tour was begun where this auditor was escorted into the Intake area where notes were taken using the on site review notes forms for all auditors. Informational postings were reviewed, cameras, monitors, phone systems, inmate files, staff training files, medical files, medical office, shower facilities, changing rooms, searching areas, housing pods, rec areas, interview rooms, corridors and all other aspects of the facility. See Facility Characteristics for further. Staff interaction and inmate movements were also observed.

At the beginning of the audit, there were sixty-eight (68) inmates being held at the JCJF. During the audit, there were sixteen (16) inmates selected for interviews. These interviews were conducted in an interview room in the secure area of the jail. Staff was given a list of inmates to escort to the interview and when the interview was completed, staff would be advised via radio the interview was completed, staff would remove the inmate and escort another to the interview.

This random sample of inmates included inmates from every housing unit in the facility. Interviews with inmates were conducted using the DOJ PREA protocol questions. All inmates confirmed they had signed the PREA information form during booking and they were made aware of the PREA Rules that were in the rule book. They stated there is a PREA reporting prompt on the phones in the pods and all they need to do is push #1 to file a PREA report,. They were also aware of the PREA Audit dates as this information had been posted for several weeks prior to the audit visit.

Inmate interviews included adult male and adult female, general population and a sample from every pod in the facility. There was one inmate being held in administrative segregation that was not interviewed due to a safety and security risk. This inmate was heard on several occasions during the on site visit to be loud, demanding and at times threatening.

There were no youthful inmates or inmates with physical disabilities, blind deaf, hard of hearing or having

cognitive disabilities, no inmates that identified themselves as believing they were vulnerable or identifying as LGBTI and no inmates who were segregated due to high risk of sexual victimization and none that reported sexual victimization during screening.

Of these 16 inmates one was interviewed that had reported a sexual assault to staff and that investigation has been completed as unfounded. The reporting inmate stated they had received immediate response from staff and was removed from the pod, was interviewed and the alleged aggressor removed and there has been no contact with this inmate since.

There was one inmate who was limited English proficient. During the explanation and disclaimer procedure the inmate advised he was not able to understand all that was being said by this auditor. This inmate was able to communicate that he understood enough English at booking to answer the booking questions presented by staff but not for this interview and they had not needed an interpreter up to this point while at the JCJF, he also stated he was given information in Spanish from staff and he was able to use the telephone system as it can be prompted to Spanish.

The JCJF staff was requested to contact an interpreter to continue the interview. An interpreter was contacted by staff for completion of the interview.

Staff interviews included: 12 Random Staff, 2 Intake, 2 First Responders, 1 Segregated Housing and 1 Risk Screening, 4 Volunteers and Contractors and 1 Medical. These interviews were conducted using the DOJ PREA Protocol Interview Questions. The security staff at the JCJF perform the multiple functions of all duties and are not task specific to each job at the jail and are trained on all these responsibilities as required by Department Policy, Iowa Code 501 and Iowa Law Enforcement Academy Jail Training. The Medical staff are on duty part time and do not perform forensic exams at the facility. Volunteers and contractors are aware of the repercussions to violating the Zero Tolerance Policy.

The on site audit was concluded on 04-26-18 with a meeting involving the Sheriff and Jail Administrator. This meeting was an informational meeting to explain some areas that needed corrective actions completed. This auditor advised the administrators an interim report would be completed and sent to them with the corrective action requirements spelled out specifically. A list of items that could be worked on was explained and documented by the Jail Administrator.

A recommendation to revise the entire PREA policy was offered. This was due to several areas not addressed and to be complete, it would be easier to implement the standards to fit the needs of the Jasper County Jail. This was agreed upon and time lines were set to allow as much time for the Jasper County Administration to utilize the days before the Interim Report would be due then the 180 day Corrective Action Period.

Interviews with the administration were not conducted at this time since there were many policies that needed implemented, the administration would be in a position to not be able to answer appropriately.

The administration would begin work on several areas that needed corrective action and would be in contact over the next several months in preparation of the Corrective Actions being implemented.

A date of November 29, 2018 was agreed upon to return to the JCJF to perform the review of all corrective actions that had been identified in the interim report.

Prior to the November 29 date, this auditor had been in contact several time with Jail Administrator Hecox regarding required action. This auditor was able to review new policies and make recommendations. I was informed policies were approved and training of staff was ongoing. Documentation and photos were sent regarding changes made since the on site visit.

On November 29, 2018 this auditor arrived at the Jasper County Jail and met with Jail Administrator Hecox. A tour of the facility was given where observations were made of updates and needed corrective actions. The corrective actions needed and corrective actions taken are all explained in detail in the individual standard within this report.

Interviews were completed with the Administration and Investigator during the corrective action review. This auditor also conducted informal interviews with line staff and inmates to confirm policy and practices had been implemented as needed.

Upon completion of interviews and observations, this auditor spoke to Jail Administrator Hecox to explain the findings and that a final report would be completed over the next few days.

At this point with all the updates in policy, training, and all other areas needing corrective action that were addressed by the Jasper County Jail Administration and staff, the Jasper County Jail would meet all PREA Standards.

See individual standards for details and corrective actions needed and corrective actions taken.

## AUDIT FINDINGS

### Facility Characteristics:

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

The JCJF was built in 2005 and houses the Jasper County Sheriff's Office, County wide dispatch and County Emergency Coordinator. This facility was built approximately 6 miles east of Newton, Iowa and is accessible from Interstate I-80.

Staffing of the jail is the responsibility of the Jasper County Sheriff who uses civilian staff members. This staff includes the Chief Jailer, 16 full time and 2 part time employees. There are a minimum of 2 security staff members on duty at all times with one being a female. The schedule is reviewed daily and any updates are addressed immediately upon learning new information.

The JCJF is a podular remote facility with a capacity of 84 inmates. The intake area is designed to accommodate the incoming arrests prior to being placed in housing. This Intake area contains the temporary holding cells, an interview and intoxilyzer room, booking desk, solitary cell, medical cells and medical exam room. Inmates are limited to their appropriate cell unless escorted by security staff. The Intake area has cameras monitored by the Control room staff. The individual cells do not have cameras for monitoring purposes.

The jail court room is just off Intake where a closed circuit system is used for initial appearances. Each inmate is placed in front of a camera and monitor for the magistrate while determining bond or release.

The change out room does not utilize a camera for observation purposes, staff will stay outside of the open door for safety reasons.

The housing area is designed with a central control unit for staff that is surrounded by glass. All housing units can be observed by control room security staff and this control room staff has the responsibility to open doors and allow entry of anyone requesting access to the facility. They are also tasked with security of those leaving the facility.

There are cameras that are also utilized for monitoring of inmates while they are in the living unit. Pods have lower and mezzanine levels for the cells with the common day room on the lower level. There are showers and toilets available on both levels of each pod.

The inmates at the JCJF are classified at the time of booking for placement into the selected pods to keep felony and misdemeanor charged inmates separated along with special need or pretrial detainees from time servers.

Pods were all equipped with inmate rule books, informational postings and a phone system. The phone system has been programmed to assist inmates reporting a PREA violation by pressing #1 when prompted. This system also has Spanish instructions available.

Cameras are mounted in the day room and hallways of the JCJF. These cameras allow viewing of inmates while in the day rooms but do not allow viewing of inmates while in their individual cells, while in showers or while using the bathroom facilities.

There are limits to the camera and monitors for viewing inmates while at the door of the pods though

these areas can be seen by control staff from the control room.

The JCJF is able to keep females and males separated by facility design. A common exercise room divides these areas and is also monitored for inmates safety.

The JCJF does have a kitchen that does not allow inmate access. The kitchen staff has no contact with inmates as the food is taken by security staff once prepared.

All other rooms within the facility are kept secured and not accessible to inmates.

Visitation is conducted via a camera and monitoring system to keep inmates separated from the public.

The JCJF does have counselors and church services available for inmates as requested.

## AUDIT FINDINGS

### Summary of Audit Findings:

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

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

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

### Interim Report

Number of standards exceeded: 0

Number of standards met: 16

Number of standards not met: 29

Number of standards not applicable: 0

Each standard has been addressed individually within this report with the corrective actions necessary. See attached standards.

## Standards

### Auditor Overall Determination Definitions

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

### Auditor Discussion Instructions

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

115.11	<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 Jasper County Jail Facility has implemented Policy 400.00 which outlines the agency's zero tolerance policy and compliance with the PREA Standards, stating in part "The Jasper County Sheriff's Office has a zero tolerance policy for an incident of rape, sexual assault or sexual misconduct, and makes every effort to comply with applicable components of the Prison Rape Elimination Act of 2003."</p> <p>This policy continues by stating:</p> <p>A. The agency shall have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlining the agency's approach to preventing, detecting, and responding to such conduct.</p> <p>B. An agency shall employ or designate an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities.</p> <p>Policy 401.00 includes all definitions regarding PREA terminology.</p> <p>Observations:</p> <p>The JCJF employs a Chief Jailer who has been assigned the position of PREA Coordinator to fill these responsibilities, the Chief Jailer has been given the time and authority to perform the job as PREA Coordinator.</p> <p>The Jasper County Jail has a web page that posts the information of the zero tolerance policy of the jail.</p> <p>Interviews:</p> <p>During the on site audit, this auditor was able to confirm all staff were aware of the policy as written and understood their responsibilities as trained per the PREA Policies.</p> <p>Interviews with the Sheriff, Chief Deputy and PREA Coordinator confirm the Zero Tolerance Policy has been implemented and the PREA Coordinator responsibilities have been assigned to the Chief Jailer.</p> <p>Documentation:</p> <p>Policy 400.00</p> <p>Policy 401.00 Definitions</p> <p>Web site</p>

115.12	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF has established policy 402.00 regarding contracting with outside agencies to hold inmates. This policy requires the contracting agency to be PREA compliant and allows the Jasper County Sheriff to check the facility at any time to ensure the agency is in compliance.</p> <p>Observations:  The JCJF has a capacity of 84 inmates. The average daily inmate population for the time period of Feb 2017 thru Feb 2018 is documented to be 46. With this population, the JCJF is not saddled with the need to outsource their inmates for housing and so does not contract with other agencies for inmate housing needs.</p> <p>Interviews:  Administration confirmed they do not outsource their inmates to other facilities and are not currently contracting with other agencies.  If they were to contract with other facilities, they would require that agency comply with the PREA Standards.</p> <p>Policy:  402.00</p>

115.13	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF was assessed by Ryan Correctional Consulting Services and report dated August 11, 2014. This consultation was requested by Sheriff Halferty and included a staffing recommendation. This assessment followed the National Institute of Corrections protocol for staffing along with the personal observations by Ryan Correctional Consulting Services Staff. Since this report was issued in 2014, the JCJF has begun to implement the PREA Standards as their operating policy.</p> <p>At the time of the pre-audit questionnaire and on site visit, the JCJF does not have a documented Staffing Plan. The agency does have a minimum number of staff they schedule for the daily work required. The administration does observe any non-routine circumstances that may strain a minimum staffing level and makes adjustments as needed. The facility utilizes a central control room where staff can observe inmates in all the pods and hallways, this observation of staff also includes multiple cameras that are monitored from the control room.</p> <p>The JCJF, at the time of the on site audit, did not practice unannounced rounds by a supervisor or document rounds.</p> <p>Corrective action needed: PREA Standard 115.13 requirements should be reviewed and implemented into policy:</p> <p>(a) The agency shall ensure that each facility it operates shall develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect inmates against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring, facilities shall take into consideration:</p> <ol style="list-style-type: none"> <li>(1) Generally accepted detention and correctional practices;</li> <li>(2) Any judicial findings of inadequacy;</li> <li>(3) Any findings of inadequacy from Federal investigative agencies;</li> <li>(4) Any findings of inadequacy from internal or external oversight bodies;</li> <li>(5) All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated);</li> <li>(6) The composition of the inmate population;</li> <li>(7) The number and placement of supervisory staff;</li> <li>(8) Institution programs occurring on a particular shift;</li> <li>(9) Any applicable State or local laws, regulations, or standards;</li> <li>(10) The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and</li> <li>(11) Any other relevant factors.</li> </ol> <p>The JCJF should also assign a supervisor to conduct and document the unannounced rounds during the evening and overnight hours.</p> <p>Corrective Action Taken:</p> <p>The JCJF has implemented a staffing plan that includes a minimum staffing requirement that includes:</p>

Consideration for staffing minimums included the following.

- Facility design
- Video monitoring
- Proximity of deputies from other divisions
- Inmate population
- Inmate classification composition
- Inmate gender composition
- Empirical knowledge of frequency and severity of inmate incidents
- Federal, state, and local laws or mandates
- Number and frequency of activities that require inmate movement inside the facility
- Supervisory staff training and duties
- Booking data related to admission volume, type, and frequency.

The JCJF has implemented policy 403.00 to includes upper level management are required to conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. These rounds will not be done on a regular basis or on a schedule that staff will know about ahead of time.

The Jail Administrator has been assigned the task of performing unannounced rounds within the facility. The Jail Administrator is assigned to day shift though regularly will visit the jail during off hours and will conduct these unannounced rounds.

Interviews:

Staff and administration confirm they abide by the written staffing plan and make adjustments as needed.

Staffing is adjusted on a daily basis if needed and for any special circumstances that may arise.

The JCJF security is such that entry to the facility must be confirmed before being admitted. Staff assigned to the JCJF are aware they are not to notify other staff due to the unannounced rounds policy.

The Jail Administrator is assigned to perform the unannounced rounds.

The Jail Administrator advised a new supervisory position has been created and will be filled after January 1, 2019, This supervisor will also be assigned to assist with unannounced rounds.

Documentation:

Policy 403.00

Staffing Plan

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>JCJF Policy 301.00 restricts the holding of juveniles at the Jasper County Jail unless they are charged with a forcible felony, all other youthful offenders are removed from the facility upon being booked in.</p> <p>This policy requires all adult inmates to be kept sight and sound separated from the youthful inmate and also accompanied by a staff member at all times.</p> <p>The Iowa Jail Standards 201-50 require juveniles to be kept sight and sound separated from adults while in custody. A copy of the Iowa Jail Inspection report dated 11-16-17 states the JCJF is authorized by the State Of Iowa to hold youthful offenders. This certification report was issued by the Iowa State Jail Inspector.</p> <p>Observations:</p> <p>There were no youthful offenders being held at the JCJF during the on site audit. The JCJF has ample space to house youthful offenders if required.</p> <p>During the last 12 months, there was one youthful inmate held for a 13 day period. This inmate was court ordered to be held at the JCJF and was placed in a cell that was sight and sound separate from adult inmates. This offender was given the opportunity to all the same programs, exercise and other opportunities as adult inmates and was also afforded the opportunity to continue his high school education requirements.</p> <p>Interviews:</p> <p>Staff and administration stated they would hold juveniles only on a court order but would work with other agencies to provide placement to prevent housing any youthful offenders.</p> <p>Documentation:</p> <p>Policy 301.00 Iowa State Jail Inspection Report</p>

115.15	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF has issued search policy 203 and 405.00 which allows searches of individuals upon entry to the JCJF.</p> <p>This policy states in part: A. The facility shall not conduct cross-gender strip searches or cross-gender visual body cavity searches except in exigent circumstances or when performed by medical practitioners.</p> <p>The facility shall document all cross-gender strip searches and cross-gender visual body cavity searches, and shall document all cross-gender pat-down searches of female inmates. The facility shall not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, it may be determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner.</p> <p>The agency shall train security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.</p> <p>This policy is in conjunction with the provisions of Iowa Code Chapter 804.30 which addresses the search guidelines per Iowa Law. The Iowa Law is also consistent with PREA Standard 115.15.</p> <p><b>Interviews:</b></p> <p>Staff confirm they do not conduct cross-gender pat down searches on inmates as there is a male and female staff member present at all times at the JCJF. They do not conduct cross-gender strip searches without a court order and will conduct these searches with same gender and medical personnel present , these searches are documented.</p> <p>Interviews with staff and training documentation confirm staff has been trained to conduct cross gender pat down searches by the Iowa Law Enforcement Academy Instructors during their annual training.</p> <p>Interviews of inmates and staff confirmed that female inmates are never restricted from any programs or opportunities due to a female staff member not being available to perform a pat down search.</p> <p>During interviews, it was determined the staff do not always announce their presence when entering a pod housing opposite gender inmates.</p> <p><b>Inmate Interviews:</b></p> <p>Interviews with inmates also confirmed they were never in view of staff while undressed or using the toilet. Inmates also went on to say they were required to be fully clothed when in the living quarters.</p> <p><b>Observations:</b></p> <p>All areas of the facility were observed along with cameras and video monitoring equipment, there were no areas besides B-Pod (see corrective action needed) that would allow any cross gender viewing.</p>

Corrective Action Needed B-Pod:

The B-Pod toilets can be seen and inmates can be observed performing bodily functions. This was discussed during visit and exit interview. It was recommended a shower curtain type of solution to be installed in B-Pod allowing staff to observe inmates for security while limiting staff from view of inmate's genitalia when using the toilets.

Corrective Action Needed: The administration was advised staff should be trained to announce their presence when entering a pod of the opposite gender.

Corrective Action Taken:

The JCJF has installed a shower / privacy curtain to prevent staff viewing of B-Pod inmates while using the toilet facilities.

Staff has been instructed to announce their presence when entering the housing units of opposite gender inmates.

The privacy curtain was observed to have been installed and does prevent staff from viewing inmates who use the toilet facilities but does not cause a security issue.

Interviews with staff confirm they have been trained and have adopted the practice of announcing their presence when entering the housing unit of the opposite gender.

Inmate interviews confirm staff are announcing their presence upon entering a housing unit of the opposite gender.

Documentation:

Policy 230, 405.00

Iowa Code 804.30

Training Records

115.16	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF ensures inmates with disabilities and who are limited English proficient to 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.</p> <p><b>Interviews:</b>  Interviews of staff all confirmed they had the options of contacting a staff member who could interpret for the inmate, they could use an online interpreting service or using a phone app for interpreting services if needed.</p> <p>There were no inmates to interview that reported they were limited English proficient but it was discovered that during random inmate interviews that there was in fact a limited English proficient inmate. This auditor was able to advise staff of a needed interpreter, an interpreter was contacted and was used for the interview. It was learned the inmate had understood all the booking and classification questions he was asked at the time of booking. He stated the paperwork and information given to him at booking was understandable and he had no language problems while in the jail. He did state the questions and disclaimer information given to him during the PREA Inmate Interview was too complicated to conduct without the interpreter. He also confirmed the phone system has a Spanish speaking format.</p> <p>The booking and classification forms, jail rules and other booking information is available in Spanish.</p> <p>Interviews with staff all stated Spanish is the predominant language used by non-English speaking inmates.</p> <p><b>Observations:</b>  Postings in Spanish are throughout the jail for inmates to observe.  The comprehensive PREA Video is shown in English and Spanish and subtitled in both English and Spanish.  The inmate telephone system has prompts for English or Spanish.</p> <p><b>Corrective Actions Needed:</b>  The PREA postings for Spanish speaking inmates should be posted in all pods and in the Intake area of the jail.</p> <p><b>Corrective Action Taken:</b>  Postings in the pods are in both English and Spanish.</p>

115.17	<b>Hiring and promotion decisions</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The JCJF requires all jail staff to meet the hiring requirements as set by the Iowa Jail Inspection Standards 201-50.10. This includes being of good moral character as determined through a background check.</p> <p>The Jasper County Sheriff's Office is the hiring authority, this hiring process conducts a thorough background check including civil and criminal history.</p> <p>Interviews: Interviews with administration confirm they do conduct a thorough background check on all staff upon hiring.</p> <p>Corrective Actions Needed: The JCJF will implement policy requiring contractor and employee background checks to occur at least once every five years and documentation of these checks. Volunteers and contractors will not be allowed contact to inmates if they have a confirmed history of sexual abuse or harassment. This policy will include self reporting from staff, volunteers and contractors for any criminal or civil findings of sexual abuse or sexual harassment and will address the discipline for staff, volunteers and contractors upon findings of any violations. The JCJF will provide information on substantiated allegations as required by law.</p> <p>The JCJF has implemented Policy 407.00 which states in part: A. The agency shall not hire or promote anyone who may have contact with inmates, and shall not enlist the services of any contractor who may have contact with inmates, who— 1. Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997); 2. Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or 3. Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section. B. The agency shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates. C. Before hiring new employees who may have contact with inmates, the agency shall: 1. Perform a criminal background records check; and 2. Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. D. The agency shall also perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates. E. The agency shall either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in</p>

place a system for otherwise capturing such information for current employees.

F. The agency shall ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. The agency shall also impose upon employees a continuing affirmative duty to disclose any such misconduct.

G. Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

H. Unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.

The JCJF has also implemented a Contractor Acknowledgement form requiring contractors to be trained on the PREA Policy, reporting and notifications to comply with policies 407.00 and 412.00.

**Interviews:**

Administrative staff has implemented a formal zero tolerance training and background check process of volunteers and contractors before admittance to the JCJF.

Volunteers understand the zero tolerance policy and training as required along with being barred from the facility or possible criminal charges if violations occur.

**Documentation:**

Iowa Code 201.10 Jail Standards

Policy 407.00, 412.00

Contractor and Volunteer Acknowledgement form

Back ground checks.

115.18	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF was built in 2005 and has not made any upgrades to the facilities structure or video monitoring system since opening.</p> <p>The JCJF does have plans to add an additional dorm style pod to allow another classification option of inmates. During the planning of this pod, the administration has researched the PREA Standards and has considered the location of video monitoring, bathroom and shower facilities and all areas of the pod to enhance the agency's ability to protect inmates from sexual abuse.</p> <p>The JCJF does have policy 408.00 which addresses upgrades to the facility which states in part: the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse.</p> <p>Interviews:</p> <p>Interviews with administration revealed the video monitoring system is in the planning stages for an upgrade. The staff are aware of the dated equipment currently in use and are working with contractors to upgrade these systems for inmate and staff safety.</p> <p>Observations:</p> <p>Upgrades to the visitation and monitoring system are being installed and will allow staff to post information to inmates in a digital form and can be constantly updated.</p> <p>Documentation:</p> <p>Policy 408.00</p>

115.21	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF has implemented a policy for a Jasper County Sheriff's Office Investigator to investigate allegations of sexual abuse or sexual harassment.</p> <p>The JCJF has made contact with the Domestic Violence Alternatives Sexual Assault Center of Jasper County (DVA) and has a Letter Of Understanding (LOU) dated 08-02-12 with this organization to assist with services in the event of PREA violations.</p> <p>Corrective Actions Needed:</p> <p>The Jasper County Sheriff's Office Detective(s) assigned to any sexual abuse investigation should be trained as Sexual Abuse Investigations as required by PREA Standard 115.34, this training can be obtained through a training program via the National Institute of Corrections. This training with the current sexual abuse and investigative training the investigators have will meet the training requirements.</p> <p>The LOU from the DAV should be updated and have an addition of a Sexual Abuse Forensic Examiner or Sexual Abuse Nurse Examiner opportunity if available, victim advocate opportunity, age appropriate exams and all services at no cost to the victim. These items should all be addressed and added to the current agreement.</p> <p>Corrective Actions Taken:</p> <p>The JCJF has implemented Policy 409.00 which includes:</p> <p>Policy</p> <p>A. To the extent the agency is responsible for investigating allegations of sexual abuse, the agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.</p> <p>B. The protocol shall be developmentally appropriate for youth where applicable, and, as appropriate, shall be adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011.</p> <p>C. The agency shall offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The agency shall document its efforts to provide SAFEs or SANEs.</p> <p>D. The agency shall attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the agency shall make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member. Agencies shall document efforts to secure services from rape crisis centers. For the purpose of this standard, a rape crisis center refers to an entity that provides intervention and related assistance, such as the services specified in 42 U.S.C. 14043g(b)(2)(C), to victims of sexual assault of all ages. The agency may utilize a rape crisis center that is part of a governmental unit as long as the center</p>

is not part of the criminal justice system (such as a law enforcement agency) and offers a comparable level of confidentiality as a nongovernmental entity that provides similar victim services.

E. As requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals.

F. To the extent the agency itself is not responsible for investigating allegations of sexual abuse, the agency shall request that the investigating agency follow the requirements of paragraphs (a) through (e) of this section.

G. The requirements of paragraphs (a) through (f) of this section shall also apply to:

1. Any State entity outside of the agency that is responsible for investigating allegations of sexual abuse in prisons or jails; and

2. Any Department of Justice component that is responsible for investigating allegations of sexual abuse in prisons or jails.

H. For the purposes of this section, a qualified agency staff member or a qualified community-based staff member shall be an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual assault and forensic examination issues in general.

#### Procedure

##### Crisis Intervention Services

500 High Ave West

Oskaloosa, IA 52577

641-673-0336 Phone

641-676-1997 Fax

800-270-1620 24/7 Line

In the event of an incident that requires forensic evidence to be gathered jail staff will:

A. Immediately separate the victim into a single cell, offer medical treatment, if needed.

B. Advise the victim not to shower, brush their teeth, drink anything or change clothing.

C. Contact a PREA investigative deputy to come to the jail for an emergency PREA investigation event.

D. Secure the cell/pod area and do not allow anyone into the area so the scene is preserved for the investigating deputy.

E. Offer the victim access to Crisis Intervention Services for a counselor to talk to or come sit with them.

F. Contact Crisis Intervention Services, if the victim wants to talk to them.

G. The victim examination will be performed at Skiff Medical Center by a certified SANE examiner.

H. The PREA investigator and SANE examiner will take every effort to preserve any and all evidence in the case.

I. The PREA investigator will keep the victim advised of the investigation.

The JCJF has entered into an agreement with Skiff Medical Center and Crisis Intervention Services of Oskaloosa, IA to perform medical and counselling services as required by PREA Standards.

Sexual Assault Forensic Exams will be conducted at Skiff Medical Center.

Investigator Rozendahl has completed training for Investigating Sexual Abuse in Confined Settings.

Interviews:

Investigator has completed training for conducting sexual abuse investigation in a confined setting;

Crisis Intervention Services will provide reporting , counselling and other support services as needed for victims of sexual abuse.

Documentation:

Policy 409.00

MOU from Crisis Intervention Services

Investigator Training Certification

115.22	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF has in place their PREA Policy 410.00 that addresses all sexual abuse or sexual harassment complaints will be investigated.</p> <p><b>Observations:</b>  A review of the last 12 months showed there were two allegations referred to investigations regarding sexual harassment. The reports were reviewed and found the investigation was brought to a conclusion based on the evidence and interviews given.  Reports confirmed interviews, video recordings and any other evidence available was used to conduct these investigations.</p> <p><b>Corrective Action Needed:</b>  The PREA Policy as written addresses the criminal investigation but needs to insure allegations of administrative violations are also investigated.  The JCJF has an agency web site, this site should have the agency Zero Tolerance Policy and Investigation information posted for the public to observe.</p> <p><b>Corrective Action Taken:</b>  The JCJF has implemented Policy 410.00 that insures an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.</p> <p><b>Interviews:</b>  Interviews with administrative staff confirm they will conduct an investigation on any and all sexual abuse or sexual harassment allegations.  Interview with the investigator confirms he will be informed and investigate all allegations of sexual abuse in the JCJF.  Interview with the investigator confirm he will conduct all criminal investigations of allegations and will provide assistance for administrative investigations as to prevent any conflicts of interest during any investigation of allegations.</p> <p><b>Observations:</b>  The agency policy on zero tolerance has been posted on the Jasper County Jail Web Site.</p> <p><b>Documentation:</b>  Policy 410.00  Jasper County Jail Web Site</p>

115.31	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF trains all jail staff by requiring them to attend the Iowa Law Enforcement Academy Jail School upon being hired. Staff is also required to attend Iowa mandated 20 hours of jailer training annually and any in house training offered by Jasper County.</p> <p>This training includes:</p> <p>Zero Tolerance Policy for sexual abuse and sexual harassment, their responsibilities of prevention, detection, reporting and responses. Staff is also trained on the inmate's rights to be free from sexual abuse and sexual harassment, inmate's and employee's rights to be free from retaliation for reporting, training to understand the dynamics of sexual abuse and harassment in confinement, common reactions of sexual abuse and harassment victim, how to detect and respond to signs of threatened and actual sexual abuse and how to avoid inappropriate relationships with inmates.</p> <p>The JCJF training includes requirements of Iowa Chapter 50 Jail Standards. The Iowa Jail Standards require training on sexual abuse and reporting for all jail staff, this mandatory training is set by the Iowa Law Enforcement Academy and requires new employees receive training within the first year of employment.</p> <p>Iowa jails are inspected annually by the Iowa State Jail Inspector. This annual report requires documentation of mandated training. The 2017 Annual Jail Inspection report confirms training has been conducted of all staff.</p> <p>The JCJF has implemented new policy and training for PREA related items. The staff has signed off for training of this policy.</p> <p>Interviews:</p> <p>Interviews with staff confirm they were knowledgeable and understand the PREA training received.</p> <p>Employee Training records document PREA training has been received by all staff</p> <p>The Iowa Department Of Corrections Annual Jail Inspection Report confirms all required training and policy knowledge has been documented.</p> <p>Documentation:</p> <p>PREA Policy Training</p> <p>PREA Policy Sign Off</p> <p>2017 Jail Inspection Report</p>

115.32	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF requires all volunteers and contractors that may have contact with inmates to sign a waiver and release form prior to meeting with inmates. This form does note the Zero Tolerance Policy and reporting requirements.</p> <p>Interviews:  During the interviews it was noted that all volunteers and contractors were aware of signing a form prior to entry into the jail and were familiar with the PREA term. These interviews did reveal the contractors and volunteers were not familiar with how to report an allegation if it was brought to their attention.</p> <p>Corrective Action Needed:  The contractors and volunteer form should be rewritten to cover the agency policy on zero tolerance, obligation to report, appropriate names and contact information for reporting an allegation, disciplinary remedies for infractions and appropriate response to a reported allegation.  Documentation of training received and understood by the contractor or volunteer.</p> <p>Corrective Action Taken:  The JCJF has updated a Contractor / Volunteer training and acknowledgment form that includes the agency policy on zero tolerance, obligation to report, who to report to and disciplinary remedies for infractions including being barred from the jail and possible criminal charges.</p> <p>Volunteers and Contractors have been retrained on PREA policy and reporting duties as spelled out on the new training and release form.</p> <p>Interviews:  Volunteers and Contractors are now aware of the zero tolerance policy, reporting duties and disciplinary remedies.</p> <p>Documentation:  Policy 412.00  Contractor Acknowledgment</p>

115.33	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF begins the inmate education during the booking process in Intake. This process begins by issuing the jail rule book information on the Jasper County Jail Zero Tolerance Policy and reporting information. The inmates are required to sign a form stating they have been told and understand the PREA Policy and reporting information.</p> <p>The PREA inmate training information is available in both English and Spanish in the booking area and in all the housing units.</p> <p>Interviews:</p> <p>The staff interviews conducted confirm the inmates sign the PREA Information Sign Off Sheet advising them of the information in the Inmate Rule Book.</p> <p>Interviews with inmates revealed they do know the PREA reporting information is included in the rule book and this was received in Intake during the booking process. The inmates advised they had signed paperwork but were unfamiliar with the PREA Policy and reporting information without finding it in the rule book.</p> <p>Corrective Action Needed:</p> <p>The JCJF should train staff to advise inmates of the Zero Tolerance Policy and how to report incidents of sexual assault or sexual harassment during the booking process, this information can also be documented and signed for while in booking.</p> <p>The JCJF must provide comprehensive PREA training to inmates within 30 days of booking. The JCJF has been advised to use the PREA comprehensive inmate training video that can be obtained from YouTube. At the time of the on site visit, the facility has no way of showing the video to all the pods due to cable restrictions. A recommendation is to obtain a player and monitor on a cart to move from pod to pod for comprehensive training if the cable system cannot be tapped into.</p> <p>This comprehensive training must also be documented. The JCJF has the ability to log this information in the computerized record keeping system.</p> <p>Corrective Action Taken:</p> <p>Inmates are booked in and given reporting information at time of booking. This is explained and signatures obtained stating they understand the zero tolerance policy and reporting process.</p> <p>A comprehensive training video is now being shown weekly to all inmates in all housing units, this video is in English, Spanish and close captioned.</p> <p>Inmates now sign they have seen the comprehensive video and jail log confirms when video is played.</p> <p>Interview:</p> <p>During the audit review stage, informal interviews were conducted with inmates. These interviews confirmed the PREA information is being relayed to inmates upon booking and the comprehensive videos are being shown. Inmates also stated they have signed the forms confirming they have viewed the video.</p>

Documentation:  
Intake Form

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF Policy regarding sexual abuse investigations includes the requirement that a sworn Jasper County Deputy will conduct the investigation. The Jasper County Sheriff's Office does have an Investigative Division to perform multiple investigations including sex crimes. The Sheriff will determine whether a Jasper County Investigator will conduct the investigation or if the case will be taken by the Iowa Division of Criminal Investigation.</p> <p>In the event the Jasper County Sheriff Investigator is assigned to the case, the investigator assigned will have specialized training in confinement settings, techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.</p> <p><b>Corrective Action Needed:</b>  At the time of the on site audit, the investigators have not received the specialized training as required by PREA Standard 115.34. The Jasper County Investigators should contact the National Institute of Corrections to obtain specialized investigator training to perform Sexual Abuse Investigations in Confined Settings.  The agency shall maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.</p> <p><b>Corrective Action Taken:</b>  The JCJF has implemented Policy 414.00 which states in part:  A. The Jasper County Sheriff's Office (JCSO) will provide specialized PREA Investigation training to deputies assigned to PREA Investigation duties. The JCSO is currently using the PREA Investigator program provided by the National Institute of Corrections.  B. The JCSO shall maintain documentation that all PREA investigators have completed the proper training program for PREA investigators.</p> <p>The Jasper County Investigators have completed the required Sexual Assault Investigations Training.</p> <p><b>Interview:</b>  Interview with the Investigator confirmed he has completed training in investigations of sexual abuse in confined settings through the National Institute of Corrections.  The JCJF has assigned other investigators to receive this training.</p> <p><b>Documentation:</b>  Policy 414.00  Investigator Training Certificate</p>

115.35	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF employs a part time nurse and part time Dr. These medical staff employees have received medical training as required by the Iowa Medical Profession which includes how to detect and assess signs of sexual abuse and sexual harassment and how to respond effectively and professionally to victims of sexual abuse and sexual harassment and they have been trained to report allegations of sexual abuse or harassment to security staff members.</p> <p>These medical personnel staff are employed through Advanced Corrections Healthcare where they receive PREA training which includes: Victim Advocacy, Mandatory Reporting, Community Service Provider Services, Sexual Assault Victim Signs and Evidence Preservation.</p> <p>The medical professionals at the JCJF do not conduct Forensic Exams and the facility is not equipped to perform these functions.</p> <p>Interviews: Interviews with medical staff confirm they do work with victim services and will offer care as needed to assist. Medical staff do not conduct forensic exams at the facility. Medical staff have completed PREA training as required by JCJF for volunteers and contractors, they also have been trained on Healthcare Responsibilities for PREA through Advanced Correctional Health Care.</p> <p>Corrective Action Needed: Medical staff must receive the Zero Tolerance Policy and Reporting information training as given to volunteers and contractors. This training must be documented in the training file.</p> <p>Corrective Action Taken; Medical staff have been trained on the JCJF PREA policy on zero tolerance and reporting duties.</p> <p>Documentation: PREA Training Acknowledgement Medical Sign Off</p>

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF has implemented a PREA Policy regarding screening and placement of inmates. This policy addresses the screening of inmates upon booking at the JCJF for the risk of being sexually abused by other inmates or sexually abusive toward other inmates, information obtained during the screening includes:</p> <ul style="list-style-type: none"> <li>Whether the offender has a mental, physical, or developmental disability</li> <li>The age of the offender;</li> <li>The physical build of the offender;</li> <li>Whether the offender has previously been incarcerated;</li> <li>Whether the offender's criminal history is exclusively nonviolent;</li> <li>Whether the offender has prior convictions for sex offenses against an adult or child;</li> <li>Whether the offender is or is perceived to be gay, lesbian, bisexual, transgender, intersex or gender nonconforming;</li> <li>Whether the offender has previously experienced sexual victimization;</li> <li>The offender's own perception of vulnerability.</li> </ul> <p>The intake screening shall consider prior acts of sexual abuse, prior convictions for violent offenses and history of prior institutional violence or sexual abuse, as known to the agency, in assessing offenders for risk of being sexually abusive. If the inmate is being held on a civil immigration purpose only</p> <p>Inmates may not be disciplined for refusing to answer, or for not disclosing complete information in response to screening questions staff are trained to document the refusal to answer and move to the next question.</p> <p>The screening information is secured and only available to security staff that would need the information to assist in appropriate placement of the inmate.</p> <p>Interviews:</p> <p>Booking is completed usually within 2 hours of admission to the JCJF. Staff advised that all inmates are given the Risk Screening questions at booking. If they have difficulty or need an interpreter, the staff will offer any assistance needed. Staff secure this form in the inmate file which is kept in a secure area accessible only to security staff.</p> <p>Staff stated that if an inmate is determined to need special placement due to victimization, they will reassess housing placement as soon as new information is obtained. Staff also stated there would be no disciplinary action held against an inmate for failing to disclose complete information in response to the screening questions</p> <p>Inmate Interviews:</p> <p>There were no inmates that perceived themselves to be victims, at risk of abusiveness or LGBTI being held at the JCJF during the on site audit. Those inmates that were interviewed stated they had been asked the Risk Assessment questions during booking.</p>

Observations:

A random sample of inmate files were reviewed. All files contained the Booking Screening for Risk of Sexual Victimization and Abusiveness form filled out.

Inmate files are secured and available only to security staff that need the information for placement or review.

Corrective Action Needed:

The Policy should reflect a maximum of 30 days to reassess the risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening. This policy should also state a reassessment when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness.

Corrective Action Taken:

The JCJF has added policy 416.00 which includes ". Within a set time period, not to exceed 30 days from the inmate's arrival at the facility, the facility will reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening. "

Interviews:

Administration confirmed that in a case for review, the inmate will be observed daily by staff and any reports information will be forwarded and reassessment will occur as information is obtained. This will be completed within 30 days.

Observations:

The JCJF staff observe and interact with the inmates. The staff's observations of any problems or conflicts are addressed by line staff or administration as soon as they observe any issue.

Inmates were open and comfortable around staff, allowing a free flow of communication of any problems or issues they wished to be addressed.

Interviews:

Staff stated they would be aware of behavior changes inmates may have that would reveal problems that may come up.

Inmates stated they were comfortable talking to all staff members if they felt an issue needed addressed.

Policy:

416.00

115.42	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF uses the screening information obtained at booking to determine housing for all inmates 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 JCJF considers on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems, these placements are reviewed and reassessed whenever new information is obtained. Transgender inmates own views with respect to his or her own safety are given serious consideration in housing decisions. All inmates are given the opportunity to shower separately from other inmates.</p> <p>The JCJF has in place policy 417.00 which states:</p> <p>A. The agency shall use information from the risk screening required by § 115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p>B. The agency shall make individualized determinations about how to ensure the safety of each inmate.</p> <p>C. In deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems.</p> <p>D. Placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety experienced by the inmate.</p> <p>E. A transgender or intersex inmate's own views with respect to his or her own safety shall be given serious consideration.</p> <p>F. Transgender and intersex inmates shall be given the opportunity to shower separately from other inmates.</p> <p>G. The agency shall not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.</p> <p>Interviews:</p> <p>Interviews with the staff confirmed they use the risk screening information to determine placement of all inmates at the Jasper County Jail. This information is available to security staff only.</p> <p>The staff will speak to each inmate to determine their risk and make individual and case by case determinations for housing placements.</p> <p>Staff will reassess placement any time new information is presented to them concerning safety</p>

to all inmates.

Staff stated if an inmate feels uncomfortable using a shower in the pod, they can be taken to intake for showering.

The JCJF uses the screening information obtained at booking to determine housing for all inmates 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 JCJF considers on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems, these placements are reviewed and reassessed whenever new information is obtained.

Transgender inmate's own views with respect to his or her own safety are given serious consideration in housing decisions.

All inmates are given the opportunity to shower separately from other inmates.

Observations:

The JCJF is designed with single person showers that have curtain coverage to prevent viewing. There is no need to remove an inmate from a housing unit to offer a more private shower.

There were no LGBTI or inmates who reported possible victimization to be interviewed during the on site audit. The interviews of random inmates all concluded the staff at the JCJF were very professional and all inmates felt they could speak candidly with security staff knowing any problem would be addressed immediately.

Documentation:

Inmate Risk Screening Form

Policy 417.00

115.43	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF has implemented the risk screening evaluation at booking to determine housing placement of all inmates including those at risk to offend or at risk of sexual victimization. This screening is used in part with the inmate's fear of victimization or likelihood to offend. The JCJF has several pods available to house inmates based on their classification and any behavioral information.</p> <p>During the last year, the JCJF has not used involuntary segregation housing because of a high risk for victimization.</p> <p>Interviews:</p> <p>Interviews with staff confirmed there were no inmates that viewed themselves as being at risk of sexual victimization.</p> <p>Staff also stated if any information was obtained about an inmate being at risk, that inmate would be moved and classification reviewed to return the inmate to population within 30 days.</p> <p>Interviews with inmates also confirmed there were no inmates that felt they were at risk of victimization and none of these inmates had ever been placed in involuntary segregation for being at risk.</p> <p>Inmates also felt very safe in all the pods and were confident staff would respond to any concerns that may be brought to their attention.</p> <p>Observations:</p> <p>During the audit tour, there were no inmates being housed in involuntary segregation due to a risk of victimization to be interviewed.</p> <p>Corrective Action Needed:</p> <p>Though the JCJF has not been confronted with this issue, the PREA Standards require a response and documentation, for this reason, a policy should be added to reflect PREA Standard 115.43 to give guidance and insure all the requirements are met:</p> <p>Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.</p> <p>(b) Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document:</p> <ol style="list-style-type: none"> <li>(1) The opportunities that have been limited;</li> <li>(2) The duration of the limitation; and</li> <li>(3) The reasons for such limitations.</li> </ol> <p>(c) The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment</p>

shall not ordinarily exceed a period of 30 days.

(d) If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, the facility shall clearly document:

- (1) The basis for the facility's concern for the inmate's safety; and
- (2) The reason why no alternative means of separation can be arranged.

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

#### Corrective Action Taken:

The JCJF has implemented policy 418.00 which states:

A. Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.

B. Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document:

1. The opportunities that have been limited;
2. The duration of the limitation; and
3. The reasons for such limitations.

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

D. If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, the facility shall clearly document:

1. The basis for the facility's concern for the inmate's safety; and
2. The reason why no alternative means of separation can be arranged.

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

#### Procedure

A. Staff will review screening classification at intake.

B. If the possible victimization of an inmate may occur alternate housing options will be utilized to protect the inmate.

C. Housing options for these inmates will be reviewed periodically to determine appropriate housing placement.

D. Documentation for alternate housing will be kept in the inmate's file.

#### Interviews:

Administration confirmed they will follow the 30 day requirement though staff observes inmates daily and will report any new information daily or as they obtain any new information.

#### Documentation:

Policy 418.00



115.51	<b>Inmate reporting</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p><b>Auditor Discussion</b></p> <p>The JCJF offers inmates multiple internal ways to privately report sexual abuse and sexual harassment allegations, this can be completed by reporting to staff during any staff security rounds, via the intercom system in the cells, reporting to medical staff, writing a note to staff or asking to be removed from the pod to speak to staff privately.</p> <p>The JCJF offers multiple options to report sexual abuse and sexual harassment allegations to outside entities also. The phone system in the pods are programmed for inmates to report any PREA violation by simply pushing #1 as prompted by a recorded message. This occurs any time an inmate makes a phone call. The phones are also programmed to accept outgoing calls to the Domestic Violence Hotline without cost to the inmates. Each of these services will contact the JCJF to report the allegation immediately.</p> <p>Staff has been trained to accept all reports made verbally, in writing, anonymously and by third party, all reports are documented.</p> <p>Staff also has the ability to privately report any information to administration by phone, text, e-mail or in person.</p> <p>Inmates held on civil immigration purposes are given phone numbers and consulate contact information.</p> <p><b>Interviews:</b></p> <p>Interviews with staff confirmed they will accept all forms of reporting of sexual abuse or harassment from inmates including third party reporting. These reports will all be documented and the investigative process will begin.</p> <p>Staff also stated they can privately report any information to the Chief Jailer at any time, if the Chief Jailer is not on the premises, staff can make contact by phone or text and if there is no time restraint, an e-mail can be sent.</p> <p>All staff are allowed to carry their phone while on duty and all have a direct number to the Chief Jailer.</p> <p>Interviews with the inmates confirmed they were all aware when they picked up the phone, they could push #1 to report a PREA violation. They were also aware the rule book had other reporting information phone numbers available.</p> <p><b>Observations:</b></p> <p>During booking the inmates are given reporting information and once in the pods, the jail rule book is posted for all inmates to have access. This information includes how to report internally and advises how the toll free phone system works for reporting.</p> <p>There were no civil immigration hold only inmates to interview for confirmation of consulate information having been relayed at booking.</p> <p><b>Corrective Action Needed:</b></p> <p>The phone system for reporting PREA violations needs repaired to make the connection to the reporting entity.</p> <p>The phone number for the Domestic Violence Alternatives needs to be unblocked from the</p>

phone to allow toll free calls.

Postings in the pods should offer the internal, outside agency contact information and other options for reporting a PREA violation.

Corrective Action Taken:

The JCJF has repaired the phone system to allow outgoing calls to the appropriate agencies.

Reporting information given to inmates includes:

A. Inmates can report incidents of sexual abuse, sexual harassment, retaliation by inmates/staff for making a report; and staff neglect or violation of responsibilities that may have contributed to sexual abuse or sexual harassment in the following ways:

1. National Sex Abuse Hotline 1-800-656-4673
2. Iowa Sex Abuse Hotline 1-800-284-7821
3. S.A.N.E & S.A.F.E Local Hotline 1-800-270-1620
4. Pressing 01 on any inmate phone after picking it up

Observations:

During the corrective action review, the inmate phones were tested in the housing units. The phones now allow inmates to make toll free calls to report any PREA violation.

The PREA posting information is in all pods and in the rule book given to all inmates. The agency web site also contains the reporting information.

Documentation:

Inmate Rule Book

Housing unit postings

Policy 419.00

115.52	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF has in place a policy for grievances to be filed. This current policy is set as a normal disciplinary grievance system and not designed for PREA grievances or emergencies. The JCJF utilizes an inmate grievance procedure via the phone system.</p> <p>Corrective Action Needed: The JCJF should review PREA Standard 115.52 and implement this information into policy for guidance to a PREA related grievance. Implementing this into policy will assist with responses, time restrictions and emergencies.</p> <p>Corrective Action Taken: The JCJF has implemented policy 420.00 which states: A. (1) The agency shall not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse. (2) The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse. (3) The agency shall not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse. (4) Nothing in this section shall restrict the agency’s ability to defend against an inmate lawsuit on the ground that the applicable statute of limitations has expired. B. The agency shall ensure that— (1) An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and (2) Such grievance is not referred to a staff member who is the subject of the complaint. C. (1) The agency shall 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. (2) Computation of the 90-day time period shall not include time consumed by inmates in preparing any administrative appeal. (3) The agency may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The agency shall notify the inmate in writing of any such extension and provide a date by which a decision will be made. (4) At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, the inmate may consider the absence of a response to be a denial at that level. D. (1) Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, shall be permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of inmates. (2) If a third party files such a request on behalf of an inmate, the facility may require as a</p>

condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.

(3) If the inmate declines to have the request processed on his or her behalf, the agency shall document the inmate's decision.

E. (1) The agency shall establish procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse.

(2) After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, the agency shall immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken, shall provide an initial response within 48 hours, and shall issue a final agency decision within 5 calendar days. The initial response and final agency decision shall document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

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

#### Procedure

A. Any and all PREA complaints will be documented per policy.

B. Regardless of the date of occurrence the PREA policy and procedures will apply.

#### Interviews:

Administration advised they will accept grievances or reports for any PREA Violation and investigate thoroughly. They will follow the time lines as set by policy 420.00.

#### Observations:

There were no PREA related grievances filed to observe.

#### Documentation:

Policy 420.00

115.53	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF has implemented an agency wide PREA policy and are working to meet the PREA standards including 115.53 for Inmate's access to confidential support services.</p> <p>Interviews:</p> <p>Interviews with administration confirm they are working with the local hospital and Domestic Violence Alternatives of Jasper County to obtain victim advocate and support services related to sexual abuse. The contact information for these will be posted upon a Letter of Understanding being agreed upon to meet the needs of the JCJF.</p> <p>Inmate interviews confirmed they were aware of the posted phone numbers to support services.</p> <p>Inmate stated they were aware of the phones possibly being monitored and they understood staff would be required to pass on information they learned of any sexual abuse or harassment allegation.</p> <p>Observations:</p> <p>The JCJF has signs posted in intake informing inmates of communications possibly being monitored.</p> <p>Corrective Action Needed:</p> <p>Review and implementation into policy PREA Standard 115.53 for guidance and information purposes.</p> <p>Letter of Understanding from local hospital and Domestic Violence Alternatives from Jasper County or other victim advocate and emotional support services group.</p> <p>Posting contact information for these advocate services.</p> <p>Corrective Action Taken:</p> <p>Policy 421.00 has been implemented requiring the facility to provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations, and, for persons detained solely for civil immigration purposes, immigrant services agencies. The facility shall enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible.</p> <p>B. The facility shall inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.</p> <p>C. The agency shall maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse. The agency shall maintain copies of agreements or documentation showing attempts to enter into such agreements.</p> <p>The JCJF has entered into an agreement with Crisis Intervention Services for support services and counselling.</p>

Reporting information and phone numbers are posted in all housing units for inmates.

Interview:

Interview with Crisis Intervention Services confirm they have entered into a letter of understanding to provide victim advocate and support services related to sexual abuse and as required by PREA Standards.

Interview with administration confirm the letter of understanding with Crisis Intervention Services has been updated and services will be used as needed.

Observations:

Postings in housing units contain contact information for support services.

Inmate phones are programmed to dial 01 as direct link to Crisis Intervention Services.

Documentation:

Housing unit postings

Policy 421.00

LOU from Crisis Intervention Services

<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF will accept a third party report of any sexual abuse and sexual harassment allegation.</p> <p>Interviews: The JCJF staff all advised they would accept a third party report of information on any sexual abuse or harassment allegation and forward this information to the Chief Jailer to begin an investigation.</p> <p>Observations: The JCJF is part of the Jasper County Sheriff's Office that has a web page and Face Book page to inform the public of events and information. The web page gives a link to send e-mails and information to each administrator including a direct link to the Chief Jailer.</p> <p>Corrective Action Needed: Post information on how to report a PREA violation on the agency web site and Face Book page. This information should include how to report by third party, local and state sexual abuse hotlines, any victim service agencies the JCJF has entered into LOU's with, State Ombudsman's Office Info and any other group that may be a reporting service.</p> <p>Corrective Action Taken: The JCJF has implemented policy 422.00 requiring the agency to make available information for third party reporting.</p> <p>The reporting information is posted on the agency website with multiple support groups to report any PREA violation to. Links are also available on the web site to directly e-mail administrative staff.</p> <p>Documentation: Policy 422.00 Agency web site</p>

115.61	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF PREA Policy 423.00 reflects the staff reporting requirement that all staff are to immediately report any knowledge, suspicion or information regarding an incident of sexual of sexual abuse or sexual harassment that occurred in the Jasper County Jail.</p> <p>The JCJF policy also requires that jail staff are not allowed to reveal any information of a sexual investigation or other information obtained to anyone other than, to the extent necessary, to make treatment, investigation and other security decisions.</p> <p>Reporting of information by mental health staff in the jail is required for Iowa Mandatory Reporters. They must report any information of a confidential nature that involves sexual abuse or harassment as it pertains to possible criminal charges.</p> <p>All reports will be referred first to JCJF administration and then to investigations.</p> <p>Interviews:</p> <p>Staff interviews revealed that all staff were all aware of their responsibility to report allegations to their supervisors immediately upon receiving information on allegations and they all were aware of keeping information about their job and responsibilities as confidential. If there were any reports made, they would give that information to administration, investigators or other staff that would need the information for purposes of the inmate's safety or investigation.</p> <p>Medical staff advised they would advise inmates of their duty to report.</p> <p>Observations:</p> <p>During the on site audit tour it was observed the inmate's files and all confidential documentation were kept in secured areas not available to anyone other than security personnel or those required to access the information.</p> <p>Booking files were secured in the Chief Deputy's Office and accessible only to security staff. Medical files were secured in the Medical Office and accessible only to medical personnel. PREA files were secured in the Chief Deputy's Office where they are kept locked and secured.</p> <p>The administration has designed a Sexual Assault Response Plan Checklist to implement for notification and response protocol.</p> <p>Documentation:</p> <p>Policy 423.00 Sexual Assault Response Plan Checklist</p>

115.62	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>PREA Policy " Intake Screening " addresses housing placement and this placement considers the actions and housing assignment of inmates that may be a substantial risk of victimization. Inmates classification will be reviewed to determine the safest housing assignments available.</p> <p>Policy 424.00 also states in part: When an agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate.</p> <p>Interviews;  All staff stated that if they received information about an inmate who could be subject to substantial risk, the inmate would immediately be placed in a secure area pending an investigation or until more information is obtained to make a housing change.  This information would be passed on to the supervisor and all other security staff that would need the information to keep the inmate safe.</p> <p>Observation:  The JCJF utilizes a "Pass Down Shift Log" to advise oncoming security personnel of events that occurred throughout the day.  The JCJF has multiple pods that can be used to move inmates for their safety.  Staff interaction with inmates demonstrate they observe behavior changes and will address inmate needs for the best interest of the inmate.</p> <p>Documentation:  Policy 424.00</p>

115.63	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF has in place a policy to contact another facility to pass on information regarding a sexual abuse or harassment that occurred in that facility.</p> <p>The JCJF did receive information of an alleged abuse at another facility. This facility was contacted and it was learned an investigation had already been initiated.</p> <p>Corrective Action Needed:</p> <p>The JCJF should review 115.63 to reference that department heads will be the reporting parties and receivers of allegations, this should occur immediately if possible but within 72 hours of obtaining the information.</p> <p>These reports should also be documented.</p> <p>Corrective Action Taken:</p> <p>The JCJF has implemented policy 425.00 which states:</p> <p>A. Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred.</p> <p>B. Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.</p> <p>C. The agency shall document that it has provided such notification.</p> <p>D. The facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards.</p> <p>Interviews:</p> <p>Interview with the Jail Administrator advised they will follow this policy as written, follow the time line and document all reports and correspondence. These records will be kept in a secured area with other PREA related material.</p> <p>Documentation:</p> <p>Policy 423.00</p>

<b>115.64</b>	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF Policy 426.00 requires staff to separate the offender and the victim, protect the crime scene and any physical evidence and to contact a supervisor who will in turn contact an investigator to begin an investigation. Protecting the crime scene also entails staying in contact with the victim to assure evidence is not destroyed.</p> <p>Interviews:  Staff interviews confirmed they were all aware to first separate the alleged victim and perpetrator. The staff would also secure the pod to prevent destruction of any evidence that may be available.  Staff would also contact a supervisor who would notify an investigator.</p> <p>Observations:  The JCJF has a dedicated form to be used in the event of a PREA report, this form, " Sexual Assault Response Plan and Checklist" is available to all staff. This form is available in Intake and Housing. This form is a checklist for staff to follow for the multiple responsibilities they have upon taking the initial report.  The JCJF has ample cell space to remove victims from perpetrators in the event of any report. The JCJF staff are able to move inmates for their own protection pending an investigation or evidence preservation.</p> <p>Documentation:  Policy 426.00  Response Plan Checklist</p>

115.65	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Policy 427.00 for the JCJF has implemented a response plan for all staff to follow in the event of a sexual abuse allegation. This plan coordinates the actions of the first responders, medical, mental health and advocacy services, investigators and administration.</p> <p>Interviews:</p> <p>All staff interviewed have had training and knew they would first make sure the victim was safe by removing the alleged victim from the perpetrator.</p> <p>They also stated the victim would be instructed on what to do to preserve evidence.</p> <p>The first responder would contact a supervisor and any other person that would need to get involved with the victim's safety or the investigation.</p> <p>The first responders all knew where they could place victims and perpetrators to keep all inmates safe while still preserving evidence.</p> <p>Staff would contact the supervisor who in turn would notify an investigator.</p> <p>Medical staff, if available, would assist with medical needs.</p> <p>Staff would use the Sexual Assault Response Plan and Checklist to confirm proper steps are followed and documented.</p> <p>Observations:</p> <p>The JCJF has implemented a Sexual Assault Response Plan and Checklist for all staff to use in case of an allegation. This form covers all the responsibilities of a first responder to keep inmates safe upon reporting an allegation and through turning the information over to an investigator.</p> <p>The checklist is available in Intake and Housing.</p> <p>There are multiple beds and cells available for inmates to be housed in the event of a report and needed isolation.</p> <p>Documentation:</p> <p>Policy 427.00 Sexual Assault Response Plan and Checklist</p>

115.66	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Jasper County Sheriff's Office is the hiring authority for Jasper County Jail Staff. The jail staff do work under a union contract that does not limit the ability of the Sheriff to remove any employee from contact with a sexual abuse accuser during an investigation or to what extent the discipline is warranted.</p> <p>The Iowa Code requirements for jailers does not allow for anyone to be employed that is not of good moral character.</p> <p>Policy 428.00 requires review of policies and employment contracts for compliance.</p> <p>Jasper County Human Resources Manual does not allow Sexual Harassment and allows for discipline including up to termination of employment.</p> <p>Interview:  Administrative staff confirmed they are not restricted from disciplinary sanctions due to a labor contract.  Administration is not restricted from a disciplinary process or administrative suspension pending the outcome of an investigation.</p> <p>Documentation:  Policy 428.00  Jasper County Human Resources Manual</p>

<b>115.67</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>At the time of the on site visit, the JCJF did not have in place a policy to protect inmates and staff from retaliation for reporting sexual abuse allegations per PREA Standard 115.67.</p> <p>Corrective Action Needed:  Recommendation to adopt the requirements of 115.67 to include policy update, protection from retaliation of staff and inmates, monitoring assignment, housing changes, removal of alleged staff or inmate abusers from victims, emotional support services, 90 day monitoring of those who reported sexual abuse and periodic checks.</p> <p>Corrective Action Taken:  The JCJF has implemented policy 429.00 regarding retaliation; This policy states:  A. The agency shall establish a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff and shall designate which staff members or departments are charged with monitoring retaliation.  B. The agency shall employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.  C. For at least 90 days following a report of sexual abuse, the agency shall monitor the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff and shall act promptly to remedy any such retaliation. Items the agency should monitor include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The agency shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need.  D. In the case of inmates, such monitoring shall also include periodic status checks.  E. If any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation.  F. An agency's obligation to monitor shall terminate if the agency determines that the allegation is unfounded.</p> <p>Procedure  A. The Chief Jailer or designee shall oversee all PREA complaints to ensure no retaliation is ongoing.</p> <p>Interviews:  The Jail Administrator is assigned to oversee all complaints to ensure no retaliation is ongoing.</p>

The Jail Administrator can and will reassign duties to prevent retaliation.  
Policy 429.00 will be followed as written and has been trained to staff.

Documentation:  
Policy 429.00

115.68	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF has implemented the risk screening evaluation at booking to determine housing placement of all inmates including those at risk to offend or at risk of sexual victimization. This screening is used in part with the inmate's fear of victimization or likelihood to offend. The JCJF has several pods available to house inmates based on their classification and any behavioral information.</p> <p>During the last year, the JCJF has not used involuntary segregation housing because of a high risk for victimization.</p> <p><b>Interviews</b></p> <p>During the audit tour, there were no inmates being housed in involuntary segregation due to a risk of victimization to be interviewed.</p> <p>Interviews with staff also affirmed there were no inmates they viewed as being at risk of sexual victimization.</p> <p>Staff also stated if any information was obtained about an inmate being at risk, that inmate would be moved and classification reviewed to return the inmate to population within 30 days. Interviews with inmates also confirmed there were no inmates that felt they were at risk of victimization and none of these inmates had ever been placed in involuntary segregation for being at risk.</p> <p>Inmates also felt very safe in all the pods and were confident staff would respond to any concerns that may be brought to their attention.</p> <p><b>Corrective Action Needed:</b></p> <p>PREA Standard 115.68 requires protection under the PREA Standard 115.43. At the time of the on site audit, 115.43 will be in a corrective action stage, upon this standard being met, 115.68 will also be met. For this reason, the information below and implementation will meet standards as required:</p> <p>Though the JCJF has not been confronted with this issue, the PREA Standards require a response and documentation, for this reason, a policy should be added to reflect PREA Standard 115.43 to give guidance and insure all the requirements are met:</p> <p>Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.</p> <p>(b) Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document:</p> <ol style="list-style-type: none"> <li>(1) The opportunities that have been limited;</li> <li>(2) The duration of the limitation; and</li> <li>(3) The reasons for such limitations.</li> </ol> <p>(c) The facility shall assign such inmates to involuntary segregated housing only until an</p>

alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days.

(d) If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, the facility shall clearly document:

(1) The basis for the facility's concern for the inmate's safety; and

(2) The reason why no alternative means of separation can be arranged.

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

#### Corrective Action Taken:

The JCJF has implemented policy 418.00 which states:

A. Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.

B. Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document:

1. The opportunities that have been limited;

2. The duration of the limitation; and

3. The reasons for such limitations.

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

D. If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, the facility shall clearly document:

1. The basis for the facility's concern for the inmate's safety; and

2. The reason why no alternative means of separation can be arranged.

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

#### Procedure

A. Staff will review screening classification at intake.

B. If the possible victimization of an inmate may occur alternate housing options will be utilized to protect the inmate.

C. Housing options for these inmates will be reviewed periodically to determine appropriate housing placement.

D. Documentation for alternate housing will be kept in the inmate's file.

#### Interviews:

Administration and line staff stated high risk inmates will not be placed in involuntary segregated housing unless all other alternatives are reviewed and exhausted.

If there were an incident where this occurred, inmates would not be restricted from any programs or opportunities.

Inmates are observed daily and reviews of status will occur within 30 days or as new

information develops.

Observations:

The JCJF has multiple housing areas that could be utilized for high risk inmates that would not prevent them from programs or other opportunities that are available to all other inmates.

Documentation:

Policy 418.00

115.71	<b>Criminal and administrative agency investigations</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The JCJF has in place policy and procedure to investigate sexual abuse and sexual harassment allegations by using a Jasper County Deputy. This Deputy is to be trained to investigate sex crimes in confined settings, be trained regarding administrative requirements, evidence collection, interviews and all other investigatory requirements.</p> <p>Corrective Actions Needed:  At the time of the on site visit, the investigators have not completed the required training, this has been addressed in PREA Standard 115.34.  It is recommended the JCJF adopt the requirements of 115.71 regarding "Criminal and Administrative Agency Investigations" into the JCJF PREA Policy, this review and addition will meet requirements of 115.71</p> <p>Corrective Action Taken:  The JCJF has implemented policy 431.00: Criminal and Administrative Agency Investigations: This policy states in part:  When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations.  A. Jasper County Sheriff's Office will maintain certified PREA investigators who will follow PREA guidelines set forth in the PREA code and policy.</p> <p>The JCJF has also implemented a policy 414.00 for special training of investigators. Policy 414.00 states in part:  A. The Jasper County Sheriff's Office (JCSO) will provide specialized PREA Investigation training to deputies assigned to PREA Investigation duties. The JCSO is currently using the PREA Investigator program provided by the National Institute of Corrections.  B. The JCSO shall maintain documentation that all PREA investigators have completed the proper training program for PREA investigators.</p> <p>Policy 410.00 has been implemented stating in part:  A. The agency shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.  B. The agency shall have in place a policy to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The agency shall publish such policy on its website or, if it does not have one, make the policy available through other means. The agency shall document all such referrals.</p> <p>The agency has trained investigators for sexual abuse investigations in confined settings.</p> <p>Interviews:  Interview with the JCJF Investigator confirmed all allegations of sexual abuse will be investigated thoroughly and to completion.  The investigator has been trained in investigations of Sexual Assault in Confined Settings.</p>

Investigator will gather all evidence available including DNA, physical evidence, monitoring data, victim, witness and all other pertinent information to complete an investigation.

The County Attorney will be involved with criminal decisions.

Administrative investigations will be conducted by administrators and if needed an outside agency, the Iowa Division of Criminal Investigation will be called in for assistance.

Documentation:

Policy: 431.00, 414.00, 410.00

Investigator Training Records

115.72	<p><b>Evidentiary standard for administrative investigations</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The Jasper County Sheriff will assign an Deputy to investigate an allegation of sexual abuse or sexual harassment by staff. This investigator will present the evidence upon completion to the County Attorney for possible criminal charges and to the Sheriff for possible administrative remedies.</p> <p>Corrective Action Needed: Though the Sheriff can determine administrative sanctions, the terminology and policy adopted should contain "The agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated."</p> <p>Corrective Actions Taken: The JCJF has implemented policy 432.00 which states: The agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>Procedure</p> <p>A. Preponderance of the evidence will be the standard used in determining if allegations are substantiated.</p> <p>B. Will not conflict with any union contract.</p> <p>Interviews: Interview with the investigator confirmed the policy will be followed as written. The Sheriff has the authority to discipline based on this standard and is not restricted from terminating employment of the offender.</p> <p>Documentation: Policy 432.00</p>
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115.73	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>During the course of a sexual assault or sexual harassment investigation, the Jasper County Sheriff's Office Investigators will be in contact with the JCJF Administration. This information is to be passed on to the victim.</p> <p>Corrective Action Needed:  At the time of the on site audit, there were no policies regarding notification to inmates who reported a sexual assault of sexual harassment. It is recommended the JCJF review and implement the information from PREA Standard 115.73 into their policy to meet the standard and have the information available in the event of an investigation.</p> <p>Corrective Actions Taken:  JCJF has implemented policy 433.00 which states:</p> <p>A. Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, the agency shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.</p> <p>B. If the agency did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the inmate.</p> <p>C. Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever:</p> <ol style="list-style-type: none"> <li>1. The staff member is no longer posted within the inmate's unit;</li> <li>2. The staff member is no longer employed at the facility;</li> <li>3. The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or</li> <li>4. The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.</li> </ol> <p>D. Following an inmate's allegation that he or she has been sexually abused by another inmate, the agency shall subsequently inform the alleged victim whenever:</p> <ol style="list-style-type: none"> <li>1. The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or</li> <li>2. The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.</li> </ol> <p>E. All such notifications or attempted notifications shall be documented.</p> <p>F. An agency's obligation to report under this standard shall terminate if the inmate is released from the agency's custody.</p> <p>Procedure</p> <p>A. At the conclusion of an investigation into an inmate's allegation that he or she was sexually abused in the facility the agency will inform the inmate if the allegation was sustained, unsubstantiated or unfounded. This may be done in writing from the investigative deputy.</p>

B. At the conclusion of an investigation into an inmate's allegation that he or she was sexually abused by a staff member where the allegation is found to be unfounded, the inmate will be notified that the outcome is unfounded in writing.

C. At the conclusion of an investigation into an inmate's allegation that he or she was sexually abused by a staff member, where the allegation is other than unfounded, the agency shall inform the inmate when:

1. The staff member is no longer posted on their unit
2. The staff member is no longer employed at the facility
3. The staff member is indicted on charges related to sexual abuse within the facility
4. The staff member is convicted on a charge related to sexual abuse within the facility.

D. At the conclusion of an investigation into an inmate's allegation that he or she was sexually abused by another inmate, the agency shall inform the alleged victim whenever:

1. The agency learns the alleged abuser has been indicted on a charge related to sexual abuse within the facility.
2. The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

E. A copy of the notifications listed above will be attached to the rest of the documentation of the incident.

F. All obligation to make notifications under this policy shall terminate if the inmate is released from Jasper County's custody.

**Interviews:**

Investigator advised this policy will be followed and all reporting duties will be met to the victim and any reporting entities.

The investigation will continue even if the victim is no longer in custody or employment has been terminated.

**Observations:**

There were two PREA investigations completed in the past 12 months. A review of these investigations revealed the victim was notified of the findings upon completion of each investigation.

**Documentation:**

Policy 433.00

115.76	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Jasper County Human Resource Manual Section II. #4. Sexual Harassment and Sexual Discrimination states in part "C. Disciplinary Action: "Jasper County affirms its right to discipline any employee under this policy through suspension without pay or any other disciplinary action it deems appropriate in light of the seriousness of the incident."</p> <p>JCJF Policy 434.00 states in part: A. Any staff member subject to disciplinary sanctions under the disciplinary policy and procedures will be subject to the current administrative investigative process. B. The disciplinary sanction process will be compliant with employee's rights as written under the current bargaining agreement.</p> <p>Interviews: Interviews with administration confirm The Jasper County Sheriff will use discipline commensurate with the nature and circumstances of the offense. Termination is an appropriate disciplinary action the Sheriff can take. Iowa Law mandates that law enforcement agencies must report sex offenders to relevant licensing bodies.</p> <p>Documentation: Policy 434.00 Jasper County Human Resource Manual</p>

115.77	<b>Corrective action for contractors and volunteers</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1469 618">The JCJF issues a "Waiver of liability and knowledge of expectations" to all visitors including contractors and volunteers which states: "The Jasper County Sheriff's Office does not condone nor tolerate any type of inmate rape, sexual assault, sexual misconduct, consensual sexual contact, sexual abuse and sexual harassment toward any inmate(s)." This will include discipline of refusal to permit visitors into the facility and possible criminal charges by stating "The Jasper County Jail aggressively pursues any criminal acts, complaints, suspicions of sexual misconduct, up to and including prosecution under Iowa Code."</p> <p data-bbox="252 669 392 703">Interviews:</p> <p data-bbox="252 712 1477 790">Interviews with volunteers and contractors confirm they are aware they may be denied access to the facility and possible criminal charges if allegations are founded.</p> <p data-bbox="252 842 1425 920">Administration confirm they perform back ground checks on all volunteers and contractors prior to them being allowed into the facility.</p> <p data-bbox="252 929 1457 1008">Administration will deny access to volunteers and contractors during an investigation and will report findings as required to law enforcement agencies.</p> <p data-bbox="252 1059 459 1093">Documentation:</p> <p data-bbox="252 1102 882 1135">Waiver of liability and knowledge of expectations</p>

115.78	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Inmate rule book page 3 #18." An inmate will not commit or attempt to commit any lewd or indecent sexual act." This restrict inmates from having any form of sexual contact while in the JCJF.</p> <p>Inmates of the JCJF are held to administrative disciplinary sanctions pursuant to a formal disciplinary process and finding that the inmate engaged in inmate on inmate sexual abuse or upon a criminal finding of guilt.</p> <p>The administrative sanctions are posted in the Inmate Rule Book.</p> <p>The disciplinary process shall consider whether an offender's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.</p> <p>Corrective Actions Needed: The JCJF Administration will implement the requirements of 115.78 to fulfill the entire standard.</p> <p>Corrective Actions Taken: The JCJF has implemented policy 436.00 to include all the requirements of standard 115.78. Policy 436.00 states:</p> <p>A. Inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.</p> <p>B. Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.</p> <p>C. The disciplinary process shall consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.</p> <p>D. If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.</p> <p>E. The agency may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.</p> <p>F. For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.</p> <p>G. An agency may, in its discretion, prohibit all sexual activity between inmates and may discipline inmates for such activity. An agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced.</p> <p>Procedure</p>

- A. If a complaint is reported and founded disciplinary sanctions will apply.
- B. Criminal charges may be filed based on the investigation outcome.
- C. All reported PREA complaints will be documented per procedure.
- D. Complaints filed in good faith will not be subject to disciplinary sanctions.
- E. False reports or reports made in retribution are subject to disciplinary sanctions and possible criminal charges.

Interviews:

Administration confirm policy 436.00 as written will be followed and enforced for the protection and safety of all inmates.

Observations:

There were no disciplinary actions taken due to a PREA violation to review.

Documentation:

Policy 436.00

115.81	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF uses the risk screening information during booking to determine housing assignments of inmates. This screening tool has questions regarding previous sexual abuse victimization or abuser status and whether it occurred in another institution or community. This information is passed on to the medical personnel for followup counseling and evaluation.</p> <p>Policy 437.00 requires medical staff to ensure the inmate is offered a follow up screening within 14 days of reporting prior sexual abuse.</p> <p>Interviews: Interviews with medical confirm they are to receive information from staff regarding sexual abuse victim or abuser status of inmates. This information is used as part of an interview and physical assessment for inmates that are housed for more than 14 days at the SCJF. Medical staff advise inmates that they are mandatory reporters and must pass on any information relating to sexual abuse to the proper authorities. The medical staff are part time only and are at the JCJF on Tuesdays and Thursdays.</p> <p>Corrective Action Needed: Upon answering "yes" the questions of sexual victim or abuser history, the inmates are to be interviewed by medical staff within 14 days. Due to the part time hours of medical staff, an event should be entered for medical to meet with the inmate prior to the 14 day requirement.</p> <p>Corrective Action Taken: Booking staff will inform medical of any inmate who responds positively as to being a victim or abuser. Medical staff checks all intake paperwork to determine if an inmate has responded positively to being a victim or abuser. Medical staff will be aware this information within 2 to 3 days of booking and will offer follow up treatment within the 14 day requirement.</p> <p>Interviews; Administration confirmed this policy is being followed by medical staff and they review the medical booking information to offer treatment.</p> <p>Documentation: Policy 437.00</p>

115.82	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF medical staff work on a part time basis and do interview inmates as circumstances allow.</p> <p>At the time of the on site audit, the Sheriff's Office Administration and Chief Jailer are working with the local hospital and Domestic Violence Alternatives of Jasper County to agree on a Letter of Understanding to meet the requirements of 115.82.</p> <p>Corrective Actions Needed:</p> <p>Review of PREA Standard 115.82 and adopt this information into the JCJF Policy.</p> <p>Create an agreement with the local hospital or Domestic Violence Alternatives to offer the support, services, information in accordance with professionally accepted medical standards. This agreement should address treatment services that shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>Corrective Actions Taken:</p> <p>The JCJF has implemented policies 438.00 and 439.00</p> <p>Policy 438.00 states in part:</p> <p>A. Inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment.</p> <p>B. If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant to § 115.62 and shall immediately notify the appropriate medical and mental health practitioners.</p> <p>C. Inmate victims of sexual abuse while incarcerated shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.</p> <p>D. Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>Procedure</p> <p>A. Victims will be offered immediate medical treatment per ACH protocols.</p> <p>B. Victims will be offered counseling for mental health.</p> <p>C. Staff will document the acceptance or refusal of care.</p> <p>Policy 439.00</p> <p>A. The facility shall offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.</p>

- B. The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.
- C. The facility shall provide such victims with medical and mental health services consistent with the community level of care.
- D. Inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests.
- E. If pregnancy results from the conduct described in paragraph (d) of this section, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.
- F. Inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate.
- G. Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.
- H. All prisons shall 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.

#### Procedure

- A. Continuous access to medical and mental health resources will be available.

A agreement has been entered into with the Crisis Intervention Services of Oskaloosa who will provide services to the Jasper County Jail for PREA reporting and investigations including support services.

#### Interviews:

Jail Administrator advised the policy will be adhered to as written.

Crisis Intervention Staff confirmed the agreement with the JCJF is in effect and all victim and counselling needs will be met by Crisis Intervention Services as written.

#### Documentation:

Policy 438.00 and 439.00

Crisis Intervention Services Agreement

115.83	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF has been updating and implementing policy and training to meet PREA Standards.</p> <p>Interviews:</p> <p>Interviews with medical staff confirm they offer medical treatment to victims of sexual abuse and refer mental health counseling to the mental health care takers, this evaluation and treatment includes treatment plans and follow up services consistent with community care. Medical staff will offer victims pregnancy tests and information to lawful pregnancy related medical care and sexually transmitted diseases.</p> <p>Administration also stated this would occur with no cost to the victim.</p> <p>Corrective Action Needed:</p> <p>Though this is the practice of the JCJF, a policy should be included for staff and community services guidance.</p> <p>LOU or MOU from the local hospital or victim advocacy group that is to be written to comply with PREA Standard 115.82 will allow 118.83 to meet standards.</p> <p>Corrective Actions Taken:</p> <p>The JCJF has implemented policy 439.00 which states:</p> <ul style="list-style-type: none"> <li>A. The facility shall offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.</li> <li>B. The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.</li> <li>C. The facility shall provide such victims with medical and mental health services consistent with the community level of care.</li> <li>D. Inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests.</li> <li>E. If pregnancy results from the conduct described in paragraph (d) of this section, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.</li> <li>F. Inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate.</li> <li>G. Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</li> <li>H. All prisons shall 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.</li> </ul> <p>Procedure</p> <ul style="list-style-type: none"> <li>A. Continuous access to medical and mental health resources will be available.</li> </ul>

The Letter of Understanding from Crisis Intervention Services states they will provide services to victims of sexual assault as needed for any PREA investigation and reporting.

Interviews:

Administrative staff confirm all aspects of policy 439.00 will be followed.

Crisis Intervention Services will meet all requirements of the agreement entered into with the JCJF.

Documentation:

Policy 439.00

Crisis Intervention Services Agreement

<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>During the Pre-audit review, it was learned the JCJF has not implemented a policy regarding sexual abuse incident reviews.</p> <p>Corrective Action Needed:  The JCJF should review the information from PREA Standard 115.86 into policy to implement an appropriate review team to review sexual abuse investigations within 30 days of the completed investigation. This PREA Standard reports the guidelines and responsibilities of a review team and the recommendations that should be made.</p> <p>Corrective Action Taken:  During the Corrective Action stage, the JCJF has implemented policy 440.00 which states:  A. The facility shall conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded.  B. Such review shall ordinarily occur within 30 days of the conclusion of the investigation.  C. The review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.  D. The review team shall:  1. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;  2. Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility;  3. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;  4. Assess the adequacy of staffing levels in that area during different shifts;  5. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and  6. Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section, and any recommendations for improvement and submit such report to the facility head and PREA compliance manager.  E. The facility shall implement the recommendations for improvement or shall document its reasons for not doing so.</p> <p>Interviews:  Administrative staff advised they will include upper level, line staff, medical or mental health staff, investigators and agency administration to conduct reviews of incidents. This will be completed within 30 days of the conclusion of investigations.  This review team will address all the requirements as written in policy 440.00.  Reviews will be documented and files retained.</p>

	Policy: 440.00
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<b>115.87</b>	<b>Data collection</b>
	<p data-bbox="252 170 895 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1342 405">As with the sexual abuse investigation and review team of 115.86, the JCJF has not addressed a policy regarding data collection.</p> <p data-bbox="252 456 592 490">Corrective Action Needed:</p> <p data-bbox="252 501 1477 580">A review of PREA Standard 115.87 and implementation of this information into policy to supply the JCJF with guidance for collecting data for reporting purposes.</p> <p data-bbox="252 629 576 663">Corrective Action Taken:</p> <p data-bbox="252 674 970 707">The JCJF has implemented policy 442.00 which states:</p> <p data-bbox="252 719 1469 831">A. The agency shall review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by:</p> <ol data-bbox="252 842 1461 999" style="list-style-type: none"> <li>1. Identifying problem areas;</li> <li>2. Taking corrective action on an ongoing basis; and</li> <li>3. Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.</li> </ol> <p data-bbox="252 1010 1422 1133">B. Such report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse.</p> <p data-bbox="252 1144 1445 1256">C. The agency's report shall be approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means.</p> <p data-bbox="252 1267 1477 1391">D. The agency may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility but must indicate the nature of the material redacted.</p> <p data-bbox="252 1447 1477 1559">Policy 441.00 has also been added to include "The incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice"</p> <p data-bbox="252 1615 392 1648">Interviews:</p> <p data-bbox="252 1659 1430 1771">Administration confirm they will follow policy 441.00 and 442.00 as written to collect data to report to the Department of Justice information needed to complete the Survey of Sexual Violence.</p> <p data-bbox="252 1783 1406 1861">There will be an annual review of all investigations to determine any corrective actions or changes needed for the protection of inmates.</p> <p data-bbox="252 1917 336 1951">Policy:</p> <p data-bbox="252 1962 344 1995">441.00</p> <p data-bbox="252 2007 344 2040">442.00</p>

115.88	<b>Data review for corrective action</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>At the time of the on site visit, the JCJF has not addressed a policy to review data for corrective action.</p> <p>Corrective Action Needed: The JCJF should review of PREA Standard 115.88 and implement this information into policy to supply the JCJF with guidance for data review and corrective action purposes.</p> <p>Corrective Action Taken: The JCJF has implemented policy 441.00 which states:</p> <ul style="list-style-type: none"> <li>A. The agency shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.</li> <li>B. The agency shall aggregate the incident-based sexual abuse data at least annually.</li> <li>C. The incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.</li> <li>D. The agency shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.</li> <li>E. The agency also shall obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates.</li> <li>F. Upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.</li> </ul> <p>Procedure</p> <ul style="list-style-type: none"> <li>A. The Jasper County Jail will keep statistical data on all reports of sexual abuse and sexual harassment that occur in or are reported to the facility.</li> <li>B. Annually the Sheriff's Office will publish on their website the overview of all reports of sexual abuse and sexual harassment that occurred for the year before.</li> </ul> <p>This data will include the month of the report, if the allegation is sexual abuse or sexual harassment and if the outcome was substantiated, unsubstantiated or unfounded. This will be in a spreadsheet format for ease of data reporting.</p> <p>Interviews: Administration confirms they will review all information obtained to assess and improve the effectiveness of the PREA implementation. The Sheriff will approve all reports for publication including information and statistics posted on the agency web site. The Jail Administrator will redact personal information or security information that would be a threat to the facility.</p> <p>Observations: The JCJF web site contains the previous two years PREA reporting information.</p>

Policy:  
441.00  
JCJF Web Site

115.89	<b>Data storage, publication, and destruction</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The JCJF Chief Jailer has a secured and locked file in their office. This file will contain all PREA related records.</p> <p><b>Corrective Actions Needed:</b>  Upon implementing policy and data per 115.87, this information will be kept in a secure file. To comply with 115.89 the JCJF should review PREA Standard 115.89 and implement this information into policy to supply the JCJF with guidance for data storage, publication and destruction.</p> <p><b>Corrective Actions Taken:</b>  The JCJF has implemented policy 443.00 which states:  A. The agency shall ensure that data collected pursuant to § 115.87 are securely retained.  B. The agency shall make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means.  C. Before making aggregated sexual abuse data publicly available, the agency shall remove all personal identifiers.  D. The agency shall maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.</p> <p><b>Procedure</b>  A. A copy of investigation files shall be kept in a separate file location that is locked.  B. All records and report files will be kept for at least 10 years after the date of the initial data collection unless law dictates otherwise.</p> <p><b>Interviews:</b>  The JCJF Jail Administrator maintains all PREA related information.  This material is kept in a locked cabinet accessible only to the Jail Administrator, Chief Deputy and Sheriff.  The Jail Administrator will be responsible to redact personal information from published reports.  The Jail Administrator will follow policy 443.00 as written.</p> <p><b>Observations:</b>  All PREA files are kept in a locked cabinet in the Jail Administrator's office.  The JCJF web site contains the previous 2 years of reporting information.</p> <p><b>Policy:</b>  443.00</p>

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The JCJF has recently begun the process of implementing policy and training to comply with the PREA Standards, making this is the first audit to be conducted at the JCJF.</p> <p>This auditor was permitted to review all relevant agency-wide policies, procedures, reports, internal and external audits, and accreditation.</p> <p>This auditor was permitted to review a sampling of relevant documents and other records and information for the most recent one-year period including inmate files, including electronic and hard copy, staff files, inmate files, training files and all other files requested.</p> <p>This auditor was given access to, and observed all areas of the audited facilities.</p> <p>The auditor was permitted to receive copies of any relevant documents (including electronically stored information).</p> <p>This auditor was given access to interview inmates and staff in appropriate interview rooms. Inmates were given the opportunity to correspond and speak to this auditor in confidence.</p>

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This is the first audit of the JCJF and there are no previous audit reports to determine compliance. The JCJF administration have agreed they will publish this report on the Jasper County Website within the 90 day requirement.</p>

## Appendix: Provision Findings

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

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

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

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

<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

<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	yes

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

<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.)	yes

<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

115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

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

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

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

115.15 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes

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

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

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

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

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

115.16 (a)	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all	yes

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

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

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

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

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

115.17 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with inmates, does the agency: perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency: consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes

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

115.17 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes

115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	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.)	no

<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.)	yes

<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

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

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

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

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

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

115.21 (f)	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes

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

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

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

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

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

115.31 (b)	<b>Employee training</b>	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes

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

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

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

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

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

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

<b>115.33 (b)</b>	<b>Inmate education</b>	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	no
	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?	no
	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?	no

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

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

115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	no

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

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

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

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

115.35 (a)	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment?	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse?	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment?	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment?	yes

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

<b>115.35 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere?	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

115.43 (b)	<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

115.43 (c)	<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

115.43 (d)	<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

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

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

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

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

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

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

115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes

115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes

115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes

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

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

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

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

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

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

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

115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes

115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

<b>115.71 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

<b>115.83 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.)	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?	no

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

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

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

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

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

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

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

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

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

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

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

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

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

<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	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