

PREA Facility Audit Report: Final

Name of Facility: Lake Correctional Institution

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 08/08/2019

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Alton Baskerville	Date of Signature: 08/08/2019

AUDITOR INFORMATION	
Auditor name:	Baskerville, Alton
Address:	
Email:	abville42@aol.com
Telephone number:	
Start Date of On-Site Audit:	2019-06-26
End Date of On-Site Audit:	2019-06-27

FACILITY INFORMATION	
Facility name:	Lake Correctional Institution
Facility physical address:	19225 U.S. Highway 27, Clermont, Florida - 34715
Facility Phone	352-394-6146
Facility mailing address:	

Primary Contact	
Name:	Ronda Flowers
Email Address:	Ronda.Flowers@fdc.myflorida.com
Telephone Number:	352-989-9208

Warden/Jail Administrator/Sheriff/Director	
Name:	Amy Frizzell
Email Address:	Amy.Frizzell@fdc.myflorida.com
Telephone Number:	352-989-9206

Facility PREA Compliance Manager	
Name:	Ronda Flowers
Email Address:	Ronda.Flowers@fdc.myflorida.com
Telephone Number:	M: (352) 394-6146
Name:	Melissa Robinson
Email Address:	MELISSA.ROBINSON@fdc.myflorida.com
Telephone Number:	M: (352) 394-6146

Facility Health Service Administrator On-site	
Name:	Virginia Mesa
Email Address:	vmesa@CenturionofFL.com
Telephone Number:	352-989-9291

Facility Characteristics	
Designed facility capacity:	1093
Current population of facility:	1069
Average daily population for the past 12 months:	
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	
Age range of population:	
Facility security levels/inmate custody levels:	Close/Community
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	373
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	

AGENCY INFORMATION	
Name of agency:	Florida Department of Corrections
Governing authority or parent agency (if applicable):	
Physical Address:	501 S Calhoun Street, Tallahassee, Florida - 32399
Mailing Address:	
Telephone number:	850-488-5021

Agency Chief Executive Officer Information:	
Name:	Mark Inch
Email Address:	Mark.Inch@fdc.myflorida.com
Telephone Number:	850-488-5021

Agency-Wide PREA Coordinator Information			
Name:	Judy Cardinez	Email Address:	Judy.Cardinez@fdc.myflorida.com

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 PREA Audit of Lake Correctional Institution (Lake C I) was conducted by United States Department of Justice Certified Auditor Alton Baskerville and assistant Phyllis Baskerville. This is the second PREA audit for Lake C I. The onsite audit occurred from June, 26, 2019 through June 27, 2019.

The pre-audit preparations for the audit included a review of the Pre-Audit Questionnaire and supporting documents. The supporting documents included Florida Department of Corrections policies and procedures, staff rosters, inmate housing lists, inmate job assignment lists, organizational charts, educational materials, investigative files, a sampling of staff records, a sampling of inmate records, brochures in multiple languages, as well as other materials provided to support PREA compliance with each standard. The lead auditor did a complete, thorough tour of Lake C I. The auditor spoke with a number of staff and inmates while touring the facility. The impressions the auditor received from his interactions with staff and inmates were positive. Everyone was aware of the PREA audit and had received notification, and/or refresher training within recent weeks of the audit.

Notification of the audit with the auditor's contact information was sent to Lake C I for posting on April 9, 2019. The auditor received correspondence from one inmate who was recently transferred from Lake C I to Suwanee C I. The auditor received information that this inmate was receiving mental health treatment and was stabled. There were no recent PREA incident filed by this inmate.

On June 26, 2019, the audit team arrived at Lake C I at approximately 8:30 A.M. We were escorted to the conference room in the administration building where we met Warden A. Frizzell, Assistant Warden R. Flowers, and other senior staff members. Judy Cardinez, Agency-Wide PREA Coordinator, and Christina Counce, Correctional Services Consultant (PREA) were also present.

Warden Frizzell introduced her staff and the audit team shared their experience, purpose, and schedule for the onsite audit. At the conclusion of the entry meeting, the audit team gave the facility staff a pre-selected list of inmates to be interviewed during the audit. Shortly after 9:00 A.M., the lead auditor was given a tour of Lake C I. The assistant auditor was given a private office inside the compound to interview inmates.

The audit team spent (11) hours working on site on the first day of audit. We visited all the housing units and program areas. In addition to visiting the housing units, we toured the Mental Health Unit, Medical, Confinement Unit, Classification, Food Service, Education, Chapel and Visiting Area. All areas were secure and had adequate staff supervision. Inmates were well behaved and under staff supervision. PREA posters were seen throughout the buildings visited. Female staff announced their presence prior to entering the housing units. The inmates had appropriate privacy that allowed them to dress, to shower, and to use the toilet without being viewed by staff of the opposite gender. The inmates had access to telephones located in the day rooms of the housing units daily. Also, they could use the kiosk located in

each housing unit to transact activities, including emailing family members.

During the tour of the housing units, the lead auditor conducted a number of confidential interviews with random security staff. The team stayed after 7:00 P.M. to interview correctional officers assigned to the night shift. A significant number of inmates and staff were interviewed on the first day of the audit.

The audit team worked approximately (8) hours on the last day of the onsite audit. The team conducted additional interviews with inmates and staff, reviewed documents, files, policy and procedures. The audit team interviewed (25) random inmates representing all housing units. There were (15) targeted interviews conducted. The breakdown of targeted inmates are as follows: (2) inmates with physical disability, (2) inmates who are deaf or hard of hearing, (2) inmates who are LEP, (2) inmates who identify as gay or bisexual, (3) inmates who identify as transgender or intersex, (1) inmate who reported sexual abuse, and (3) inmates who reported sexual victimization during risk screening.

The audit team interviewed (13) random staff and (17) specialized staff. The random staff was chosen from all housing units and from day and night shifts.

The specialized staff included warden, assistant warden, director of nursing, PREA compliance manager, investigative staff, human resource staff, intermediate staff, staff who supervise inmates in segregated housing, security and non-security staff who have acted as first responders, intake staff, sane/safe staff, designated staff member charged with monitoring retaliation, staff who perform screening for risk of victimization and abusiveness, and, volunteers, and contractors who may have contact with inmates. The interviews of staff and inmates produced evidence that PREA training had taken place within 12 months of the audit. Training documentation was reviewed for everyone who was interviewed.

The exit meeting was conducted in the afternoon of June 27, 2019 with Warden Frizzell, Assistant Warden Flowers, Judy Cardinez, Christina Counce and other key staff members. The audit reviewed the preliminary findings with the those present. They were informed that the Interim or Final Report will be submitted to the facility within 45 days. The audit team thanked all who were present for their cooperation, and hospitality.

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.

Lake Correctional Institution is a level V Security facility within the Florida Department of Corrections. It houses close and community custody inmates. Lake C I is located in Lake County Florida approximately six miles north of Clermont, Florida. The physical address is 19225 US Highway 27 Clermont, Florida. The facility sits on 202.27 acres of land. Lake C I has a rated capacity of 1,093. The population on the first day of the audit was 1,084. The mission statement of the Lake Correctional Institution is to "Provide a continuum of service to meet the needs of those entrusted in our care, creating a safe and professional environment with the outcome of reduced victimization, safer communities and an emphasis on the premium of life".

Lake C I was originally established as a migrant labor camp in the 1940's. The physical has been a bait farm, and a beverage distribution warehouse in 1950. In 1973, it was converted by the Florida Department of Corrections to house adult male inmates. The Lake C I compound can house inmates with special needs to include wheel chairs, medical grades one through four and psychological grades one through six.

Lake Correctional Institution has a small five acre lake located within the institutional compound. There is a fence around the lake to prevent inmate access.

In the 1990's Lake Correctional Institution had several major structural alterations and added the Mental Health Unit, Confinement Unit, Classification, Food Service, Laundry, and Medical Buildings. The facility currently consists of 28 buildings inside the secured perimeter and 22 buildings outside the secured perimeter.

There is an Administration building adjacent to the facility that houses the Regional Staff Offices, Regional Maintenance and Regional Construction Offices. Lake C I has the Administrative, Investigation, Information Technology, Wellness Center, Training, Warehouse, Maintenance, Shakedown and Equipment Storage buildings located outside the secured perimeter. The materials of construction are of concrete slab floors, block walls and steel main structures that house administrative offices, programs, education, inmate housing, food service, laundry, medical canteen, religious services, maintenance and visiting.

Lake C I has three open bay dormitories, A, B and C dormitories, that were built in 1975. Each of these dorms has two wings that houses 70 inmates in each wing for a total of 140 inmates in each dormitory. These dormitories each have a total square footage of 7,975 square feet.

D-Dorm, shaped like an "L" , was built in 1975 with two tiers and a total of four wings with a total of 12,576 square feet of space. On the first floor, Wing One has 36 beds and Wing two has 38 beds. The second floor has Wing Three with 38 beds and Wing Four with 38 beds. D-Dorm has a total of 147 beds.

Lake CI's remaining inmate housing units, E, F, and H are multiple occupancy cell housing units. E-Dorm was built in 1994 and has 22,000 square feet of space. It has a butterfly design with four wings. It has two tiers with Wings One, Two and three housing 56 inmates each; Wing Four houses 54 inmates for a total bed capacity of 222.

F-Dorm is a 35,000 square feet secured cell housing unit that was built in 1995. F-Dorm has the shape of a "T". F-Dorm has three wings with two tiers that house 43 inmates on the lower tier and 43 inmates on the upper tier. There are 86 offenders on each wing and F-Dorm has a total of 258 secured housing beds. F-Dorm's Wing One is Secured Housing; Wing Two is Administrative Confinement; and Wing three is Disciplinary Confinement.

H-Dorm is the Mental Health Unit. It was built in 1997 and has 62,050 square feet of space. The Mental Health Unit has eight wings with two tiers. It houses 25 inmates on Wing One, Two, Three and 19 offenders on Wing Four on the Upper Floor. The mission of the Mental Health Unit is to provide a safe, secure, humane environment for its offenders, in which health is a primary goal, and to provide an atmosphere and opportunity for successful reintegration into society through the use of treatment, discipline, constructive classification, education, employment, training and social programs.

Lake Correctional Institution has several special offender programs. They include Victim Awareness, Anger Management, Inside Out Dads, Alcoholics and Narcotics Anonymous, Individual Monthly Counseling Sessions, Mapping (Life Skills Program), 100-Hour Transition Program, Religious Education, Treatment Planning and Addiction Education.

Lake Correctional Institution inmates are assigned to work assignments, treatment programs, and education goals according to their skill levels and program requirements. Lake C I has offender Department of Transportation and Public Work Squads.

Lake Correctional Institution is a "Florida Ready To Work Assessment Center" which test and scores inmates based on their skills and work ethic. This assists inmates when they are released back to the community.

Lake Correctional Institution has integrated the placement of inmates with acute mental health problems into its mission in the Mental Health Unit. The Mental Health Unit has one bed devoted to crisis stabilization, 50 beds for transitional care and 131 involuntary treatment facility for severe and persistent mental illness. In excess of 500 offenders in the general population receive mental health treatment on an outpatient basis.

There were a total of 1084 inmates assigned to Lake Correctional Institution on the first day of the audit.

Lake C I has a total of 371 assigned staff of which approximately 280 are security staff. There are over 90 contract employees working in Medical and the Mental Health Departments. Providing inpatient and outpatient care to the majority of the inmate population constitute a major part of the facility's mission. Lake C I appears to be doing this well based upon observations, interviews of inmates and staff, and review of written documentations.

AUDIT FINDINGS

Summary of Audit Findings:

The summary should include the number of standards exceeded, number of standards met, and number of standards not met, along with a list of each of the standards in each category. If relevant, provide a summarized description of the corrective action plan, including deficiencies observed, recommendations made, actions taken by the agency, relevant timelines, and methods used by the auditor to reassess compliance. Auditor Note: No standard should be found to be "Not Applicable" or "NA". A compliance determination must be made for each standard.

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

The Lake Correctional Institution is found to be in compliance all 45 Standards. Zero Standards exceeded, Zero Standards not met, 45 Standards met.

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	<p>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Agency Policy 602.053 (Prison Rape: Prevention, Detection, and Response) details the required practice in the agency’s approach for preventing, detecting, and responding to allegations of sexual abuse and sexual harassment. The policy includes definitions of prohibited behaviors regarding sexual assault and sexual harassment of inmates with sanctions for those found to have participated in these prohibited behaviors. The policy, available to staff and inmates, defines the specific prohibited acts, and details the responsibilities regarding staff reporting obligations. The policy also outlines the investigative responsibilities. During random interviews, staff personnel exhibited knowledge of the agency’s zero tolerance policy of sexual abuse, sexual assault, and sexual harassment. They also knew the reporting process for PREA incidents. Additionally, staff have received orientation training, with refresher training conducted during annual in-service. During random inmate interviews, the inmates exhibited knowledge of the agency’s zero tolerance policy of sexual abuse, sexual assault, and sexual harassment. The inmates also expressed that they received the PREA orientation and pamphlets.</p> <p>In November 2018, Judy Cardinez-Harris (Agency PREA Coordinator) was interviewed by Alton Baskerville, certified PREA auditor. During the interview, Mrs. Cardinez-Harris described her duties in developing, implementing, and overseeing the efforts to comply with PREA standards throughout the agency. She acknowledged that she has sufficient time to facilitate and coordinate the tasks to ensure compliance. Her responsibilities consist of communicating and coordinating with the PREA Managers at each facility statewide (which includes private facilities as well). The PREA Coordinator has received PREA training and she also receives annual in-service training. The PREA Coordinator position is listed on the agency organizational chart.</p>
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115.12	<p>Contracting with other entities for the confinement of inmates</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Lake Correctional Institution has entered into or renewed a contract for the confinement of residents on or after August 20, 2012 or since the last PREA audit. Such contracts do require contractors to adopt and comply with PREA standards. Additionally, the contracts do require FDOC to monitor the contractor’s compliance with the PREA standards. A review of file documents and discussion with the statewide PREA Coordinator support compliance of this standard.</p>
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115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Staffing Level Guidelines are developed by the Bureau of Security Operations and approved by the Deputy Secretary of Institutions. The Guidelines are used to determine the staffing levels of each security post. Security staffing levels are designated as Level I, Level II and Level III posts to assist shift supervisors in the daily staffing of their shifts by establishing priorities for post staffing which ensures continued security and safety of staff, visitors, and inmates. Description of what each Level represents as well as the relief factor can be found in Procedure 602.030. The Roster Management System (RMS) documents all security personnel and which post staff members are assigned. All deviations from the post chart are documented in an incident report accordingly. Lake Correctional Institution had one (1) deviation from the staffing plan dated July 29, 2018.</p> <p>Evidence Relied Upon: Post Order 3 - Shift Supervisor Unannounced OIC Checks Procedure 602.030 2019 Staffing Plan and Review DC6-210</p>

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Lake Correctional Institution is an adult correctional institution of the FDC and there are no youthful offenders under the age of 18 at Lake CI, it's units or satellites. The FDC does not house inmates under the age of 18 at this facility. This standard is assessed as non-applicable, thus "meets standard". Policy 944.1905- Initial Inmate Classification, 5(a) states- [Not withstanding any other provision of this section or chapter 958, the department shall assign to facilities housing youthful offenders all inmates who are less than 18 years of age and who have not been assigned to a facility for youthful offenders under the provisions of chapter 958. Such an inmate shall be assigned to a facility for youthful offenders until the inmate is 18 years of age;].</p>

115.15	Limits to cross-gender viewing and searches
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1477 528">FDC Procedure 602.018 Contraband and Searches of Inmates; FDC Procedure 602.036 Gender Specific Security Positions, Shifts, Posts, and Assignments, and Florida Administrative Code (FAC) Rule 33-602.204; addresses Searches of Inmates. It is clearly stated "strip searches of inmates shall be conducted only by correctional officers who shall be of the same sex as the inmate, except in emergency circumstances."</p> <p data-bbox="252 584 1437 786">It is also indicated that body cavity searches will only be done by medical staff. Further, Procedure 602.036, is quoted "inmates will not be supervised by officers of the opposite gender while inmates are showering or are in the toilet areas, unless appropriate privacy screening is provided to obscure from view". These Procedures and Rules do further direct the limits to cross-gender viewing and searches.</p> <p data-bbox="252 842 1445 999">These policies and procedures require staff of the opposite gender to announce their presence when entering the housing units. Inspection of the housing units and interviews of staff and inmates affirm the privacy of inmates to change clothing, shower and use to toilet within being viewed by staff of the opposite gender.</p> <p data-bbox="252 1055 1469 1256">In the past 12 months there have been zero (0) number of cross gender strip or cross gender visual body cavity searches of inmates. Additionally, in the past 12 months there have been zero (0) number of cross gender strip or cross gender visual body cavity searches of inmates that did not involve exigent circumstances or were performed by non-medical staff. This information taken from the Pre-Audit Questionnaire (PAQ).</p> <p data-bbox="252 1267 1251 1301">It is noted that the main institution and its units do not house female inmates.</p> <p data-bbox="252 1357 1485 1603">Screening materials, such as shower curtains, doors, or walls, enable inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing breast, buttocks or genitalia, except in exigent circumstances (this includes video). Staff of the opposite gender announce their presence when entering an inmate housing unit. This was observed by the auditors when touring the facility and when reentering housing areas of Lake CI.</p> <p data-bbox="252 1659 1477 1939">The FDC Procedures prohibit staff from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status. The Pre-Audit Questionnaire (PAQ) documents policies, procedures, and information concerning this and the above. 100% of all security staff have received training on conducting cross gender pat down searches and searches of transgender and intersex inmates in a respectful and professional manner. Employee training curriculum was reviewed and the lesson plan concerning, Frisk and Searches.</p> <p data-bbox="252 1995 1453 2119">Based on the interviews of staff and inmates, the review of policy and procedures, as well as the auditors' review and observation of the operations of Lake CI, the auditors assess this standard as compliant, "meets standard"</p>

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The department has established procedures to provide inmates with limited English proficiency 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. The department shall ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities, including inmates who have intellectual disabilities, limited reading skills, or who are blind or have low vision. The auditor interviewed a limited English proficient inmate utilizing the Language Line. He indicated that staff has provided him information on PREA reporting. The auditor verified a staff translator list was available. The department has a contract with Language Line for all languages. The language line is available for use by staff when a staff translator is not available. There are posters in English and Spanish posted next to the telephones. Policy prohibits the use of inmate interpreters except in emergency situations or the inmate's safety would be compromised. Staff and inmate interviews all supported that inmates would not be relied on as translators. A inmate translator was not used in a PREA allegation during the previous twelve months.</p>

115.17	Hiring and promotion decisions
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1461 405">Mr.B. Nester, Human Resource Manager, provided the following answers during an interview on June 10, 2019:</p> <ol style="list-style-type: none"> <li data-bbox="252 456 1485 658">1.) The FDC conducts a thorough background investigation that includes a complete national and state criminal history check utilizing FCIC and NCIC information centers. For criminal information that is returned on these checks we complete a Criminal Record Review (CRR), as outlined in FDC Procedure 208.049, that initiates a deeper look into the applicant's criminal charges. <li data-bbox="252 710 1461 911">2.) FDC's supplemental employment application form DC2-854 asks the following question with a "yes" or "no" response option. On page 3, Question 16, " Have you ever been civilly or administratively adjudicated guilty to have engaged in any sexual abuse or sexual harassment? If yes, explain." Our promotions process reviews any charges that would be considered disciplinary in nature. <li data-bbox="252 963 1461 1128">3.) Criminal record background checks for employees are completed by our Central Office Recruitment Team. As a part of our hiring process our employees are fingerprinted and have their biometric information retained. If an employee is arrested, our Human Resources Department is notified via FDLE's Falcon Database. <li data-bbox="252 1180 1437 1382">4.) FDC's supplemental application form DC-854 asks the following question with a "yes" or "no" response option. On Page 3, Question 16, "Have you ever been civilly or administratively adjudicated guilty to have engaged in any sexual abuse or sexual harassment ? If yes, explain." Our promotions process reviews any charges that would be considered disciplinary in nature. <li data-bbox="252 1478 1437 1680">5.) As part of our Master Training Plan, every employee is annually educated on the Prison Rape Elimination Act. The stated objective of the training is to impart to all correctional staff that the Department maintains a "zero tolerance" standard for sexual abuse and sexual misconduct within institutional and community supervision environments." <li data-bbox="252 1731 1430 1933">6.) When former employees reapply to work with FDC, a new background investigation is initiated which involves the completion of a "Request for Rehire", form DC2-814. This form probes into the applicant's work, discipline and investigation history with the department. These checks are completed with the HR Personnel Records Unit, HR Employee Relations Database, and Office of the Inspector General. <p data-bbox="252 1995 1469 2157">The auditor reviewed criminal background information on five randomly chosen employees. The information showed the date of hire, date of FCIC and NCIC search and the date the employee was entered into Live Scan. The agency will get an automatic notice if an employee is charged with a legal violation. FDC and Lake CI are in compliance with this standard based</p>

upon the above stated information.

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Lake Correctional Institution has installed video monitoring technology in order to assist in preventing, detecting and responding to sexual abuse and sexual harassment allegations.

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Department's Inspector General's Office (IG) is responsible for conducting all investigations (both, criminal and administrative) that involve allegations of sexual abuse and sexual harassment. The Department follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. Procedure is outlined in 108.015. All of the inspectors/investigators were trained by the Moss Group. During the onsite visit, the auditor interviewed the investigator who conveyed the investigator's role in conducting investigations. It was also stated that the investigators are required to use the uniform evidence protocol. The Department of Corrections has a current agreement termed as a Memorandum of Agreement (MOA) with the Sexual Assault Response Team (SART) to conduct forensic examinations. SART (a private contract provider) provides a SANE/SAFE nurse who reports to the facility (when authorized/needed) to conduct a forensic examination. There were three (3) forensic exams conducted during the last 12 months at Lake Correctional Institution. According to agency policy, there is no co-payment for any PREA incident or follow-up. Mental health services, along with follow up counseling are provided by Lake CI staff.</p> <p>Evidence Relied Upon: Procedure 602.053 Prison Rape Prevention, Detection, and Response - Victim Advocate Support Haven of Lake and Sumter Counties Victim Brochure</p>

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>In accordance to Procedure 108.003 (Investigative Process) and Procedure 108.015 (Sexual Battery, Sexual Harassment, and Sexual Misconduct Investigations) every allegation of sexual abuse or sexual harassment alleged to have occurred in any facility within Florida Department of Correction is to be thoroughly and completely investigated criminally or administratively. As noted earlier in standard 115.21, the Inspector Generals' Office has the legal authority to conduct criminal and administrative investigations within all prisons in the state. Interviews with administrative staff and the investigator verified that all reports of sexual abuse or harassment are reported to the OIG's office. During the past twelve months, the number of allegations of sexual abuse and/or sexual harassment that were received was nine (9). During the past twelve months, the number of allegations, resulting in administrative investigation was fourteen (14). During the past twelve months, the number of allegations referred for criminal investigation was zero. Standard 115.22 requires the agency publish their investigative policy on its website or, if it does not have one, it must make the policy available through other means. The policy can be found on the agency site at: http://www.dc.state.fl.us/PREA/index.html.</p> <p>Evidence Relied Upon : Procedure 602.053 Prison Rape Prevention, Detection, and Response - Investigation. Procedure 108.015 Sexual Battery, Sexual Harassment, and Sexual Misconduct Investigations</p>

115.31	Employee training
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1481 1686"> The auditor reviewed annual in-service and pre-service curriculum provided to the staff at Lake Correctional Institution. The curriculum subject matter includes the review of: (1) agency wide zero-tolerance policy for sexual abuse and sexual harassment; (2) how to fulfill their responsibilities in prevention, detection, reporting, and response to sexual abuse and sexual harassment; (3) inmate’s right to be free from sexual abuse and sexual harassment; (4) staff and inmate’s right to be free from retaliation for reporting sexual abuse and sexual harassment; (5) how to recognize the dynamics of sexual abuse and sexual harassment in confinement; (6) The common reactions of sexual abuse and sexual harassment victims; (7) how to detect and respond to signs of threatened and actual sexual abuse; (8) how to avoid inappropriate relationships with inmates; (9) how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; (10) and how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. Employee signature acknowledges that they understand the training received. Training records, staff interviews and curriculum reviewed indicated that the staff at Lake Correctional Institution have received the appropriate training. Additionally, during the staff interviews, all were able to verbally confirm their knowledge of the training received. Staff (including supervisory staff and staff from the executive team), also described in detail the actions they were trained to take when conducting searches of all inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates. All staff were able to relate the action they’d take in the event they received a PREA allegation. While conducting the onsite tour, the auditor spent a significant amount of time talking with the security staff in each housing unit. All of the staff members (including correctional officers who recently completed the basic corrections academy training) conveyed a clear knowledge and understanding of their role and responsibilities regarding this standard. Each housing unit has a laminated poster outlining responsibilities in responding to allegations of sexual abuse. Interviews of random staff and general questions asked during the tour clearly indicated staff understanding of all aspects of responding to allegations of sexual abuse. Training records, staff interviews and curriculum reviewed confirmed that the staff were trained. In the past 12 months, all employees assigned to the facility were trained on the PREA requirements. Employees sign and state that they understand the training they receive. Staff Training records are maintained in E-Train data base. Each staff receives an annual refresher course on PREA related topics. </p> <p data-bbox="252 1742 1481 1818"> Evidence Relied Upon: Procedure 602.053 Prison Rape Prevention, Detection, and Response - Employee Trng Zero Tolerance PREA Lesson Plan - Zero Tolerance </p>

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>In accordance with a review of Procedure 602.053 (Prison Rape: Prevention, Detection, And Response), agency training curriculum, training acknowledgement forms signed by contractors and volunteers, Lake Correctional Institution meets the mandate of this standard. Contractor and volunteer orientation training includes the agency's policy and procedures regarding sexual abuse and sexual harassment, prevention, detection, reporting, and response including zero tolerance. Of the contract workers and volunteers interviewed, each articulated their understanding of the agency's zero tolerance of sexual abuse and sexual harassment and their responsibility in reporting, how to avoid inappropriate relationship with inmates, prevention, detection and the response of sexual harassment or sexual abuse. The training provided, included the mandatory standard to report all incidents and knowledge or suspicions of sexual abuse or sexual harassment. Lake Correctional Institution has a total of 247 volunteer and individual contractor workers who have contact with inmates and all have received the required PREA training.</p> <p>Evidence Relied Upon: Procedure 602.053 Prison Rape Prevention, Detection, and Response - Volunteer & Contractor Training</p>

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>During the inmate intake process, the agency provides PREA education to all inmates. Inmates are provided a PREA Inmate Handbook which explains the agency's zero tolerance policy regarding sexual abuse and sexual harassment. The handbook also provides guidance on how to report such incidents. Inmates are shown a video presentation that addresses protection issues to include information on preventing and reducing the risk of sexual violence. These materials and pamphlets are primarily in English and Spanish but whenever possible, they are also available in the inmate's native language. PREA education is also available on audiotapes, and CD's for the visually impaired. During past twelve months, 578 inmates (whose length of stay in the facility was for 30 days or more) received comprehensive education on their rights to be free from both sexual abuse/harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents within 30 days of intake. Formal and informal inmate interviews conducted during the on-site audit revealed that they were knowledgeable of the agency's zero tolerance policy.</p> <p>Evidence Relied Upon: Procedure 602.053 Prison Rape Prevention, Detection, and Response - Visually Impaired Inmate PREA Education Facilitators Guide Instruction - Disability</p>

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The departments' investigators receive specialized training in addition to the general education provided to all staff. This training meets the expectations of the standard and provides the recipient with the needed skills to conduct investigations in a confinement setting. Specialized training includes 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. The facility maintains documentation that the investigator has received required specialized training in conducting sexual abuse investigations. The auditor interviewed the Investigator who detailed an understanding of the investigative training received. The training was based on the Moss Group training curriculum.</p> <p>Evidence Relied Upon: Procedure 108.015 Sexual Battery, Sexual Harassment, and Sexual Misconduct Investigations - Investigation</p>

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Procedure 602.053 (Prison Rape: Prevention, Detection & Response), Health Services Bulletin 15.03.06 (Post Sexual Battery Medical Plan), and the agency Training Curriculum, outlines how the agency shall ensure that all full and part-time medical and mental health care practitioners who work regularly in its facilities are to be trained. All of the health care staff are trained in the following topics: How to detect and assess signs of sexual abuse and sexual harassment; How to preserve physical evidence of sexual abuse; How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and How and to whom to report allegations or suspicions of sexual abuse and sexual harassment. The facility maintains documentation that medical and mental health practitioners have received the training referenced in this standard. During the onsite audit, the auditor conducted interviews with medical and mental health staff. The interviewed revealed that the staff members are knowledgeable of their duties and responsibilities under PREA. The contract provider for medical and mental health is Centurion Health Services.</p> <p>Evidence Relied Upon: HSB 15-03-36 Post sexual battery medical action Procedure 602.053 Prison Rape Prevention, Detection, and Response - Medical Training</p>

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency screens all inmates for risk of victimization and abusiveness upon arrival. An initial screening is completed by Intake within the 72 hours of arrival. The screening instrument includes whether the inmate has a mental, physical, or developmental disability, the age and physical build of the inmate, previously incarceration history, whether the inmate’s criminal history is exclusively nonviolent, prior convictions for sex offenses, whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming, past sexual victimization, and the inmate’s own perception of vulnerability. Information obtained during the initial assessment and reassessment is placed in the inmate’s classification file. Only authorized staff has access to these files. The assessment process is computerized and information gleaned becomes part of the Agency Inmate Behavioral Assessment Scale (IBAS). The system has been designed to identify the potential risk each inmate presents for predatory behaviors or their potential risk to be preyed upon by other inmates. The intent is for this system to be designed as an integrated web application that pulls required information from the Offender Based Information System mainframe, calculates the IBAS and Sexual Risk Indicators (SRI) designations and delivers those designations to specific OBIS screens. During the past 12 months, there were 768 inmates (whose length of stay in the facility was for 72 hours or more) entering the institution (either through intake or transfer) who were screened for risk of sexual victimization or risk of sexually abusing other inmates within 72 hours of their entry into the facility. During the past 12 months, there were 667 inmates (whose length of stay in the facility was for 30 days or more) entering the institution (either through intake or transfer) who were required to be reassessed for their risk of sexual victimization or of being sexually abusive within 30 days of their arrival at the facility based upon any additional, relevant information received since intake.</p>

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency uses information from the risk assessment 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. Lake Correctional Institution classification staff is responsible for making all housing, program, and work assignments. Transgender or intersex inmate's housing is considered on a case-by-case basis; placement considers the inmate's health and safety, and whether the placement would present management or security problems; placement is reassessed as needed. The inmate's own view with respect to his or her safety is given consideration. Transgender and intersex inmates are given the opportunity to shower separately from other inmates. During the interview of classification staff, the auditor was advised that all relevant information is shared with the appropriate staff on a need to know basis, but that the information is confidential and held to the highest level of integrity.</p>

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Agency policy prohibits the placement of inmates at high risk for victimization in segregated housing unless an assessment of all available alternatives has been made and there is no available means of separation from the likely abuser (for no longer than 72 hours). Based on supervisor interviews, when there is a situation of an inmate alleging risk of victimization and needing to be separated from the alleged abuser, segregation would be utilized as a last alternative. If this placement was necessary, staff stated that the inmate would have access to the appropriate privileges and the placement would be documented.</p>

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed post audit and also during the onsite portion of the audit indicated multiple ways (including privately and anonymously) for inmates to report sexual abuse or harassment. Interviews with a random sample of staff and inmates confirmed their knowledge of several methods to report allegations of sexual abuse/harassment. Staff and inmates were aware that inmates may report incidents of sexual abuse, sexual threats or any act of retaliation verbally or in writing, anonymously and from third parties. Staff confirmed verbal reports of sexual abuse and/or sexual harassment are promptly documented and submitted to their supervisor. Several staff also specifically stated that all reports are promptly reported without delay. During the onsite tour, the auditor observed posters and other documents on display throughout the facility. This posters detailed the reporting procedures. Haven of Lake & Sumter Counties, INC. (an independent agency separate from the Florida Department of Correction) is the private/public office that serves Lake Correctional Institution through a MOU. Inmates may privately report sexual abuse and sexual harassment anonymously if requested to a private/public entity not associated with DOC. All of the inmates interviewed during the onsite audit, expressed an understanding of how to privately report any incident of sexual abuse/harassment.</p> <p>Evidence Relied Upon: 602.053 Prison Rape Prevention, Detection, and Response - Staff Acceptance</p>

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Rule: 33-103.006 (Form DC-1303 Formal Grievance) permits inmate grievances that alleges sexual abuse, to be filed at any time regardless of when it may have occurred. The inmate, a family member, or friend can also file a sexual abuse grievance. According to policies, there is no time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse. Inmates can utilize the informal grievance process prior to initiating a formal grievance. However, inmates may skip this step and initiate the process at the formal institutional level for grievances regarding allegations of sexual abuse. Third party entities, on behalf of an inmate may also submit grievances. Emergency grievances may be filed if the inmate feels he is at substantial risk of imminent sexual abuse. Emergency Grievances Alleging Substantial Risk of Imminent Sexual Abuse – corrective action shall be conducted within 48 hours and a response must be provided within 5 calendar days. The grievance form is available on the agency web page for family and friends of any inmate to file a grievance on his behalf. In the past 12 months, Lake Correctional Institution had one (1) grievance alleging sexual abuse, zero (0) number of grievances alleging substantial risk of sexual abuse, nor grievances filed in bad faith. This information documented on the PAQ and supported by interviews of staff and inmates. Based on the auditors' review of grievances, the information outlined in the Florida Administrative Code, and interviews with staff and inmates both formal and informal, this standard is assessed as compliant, "meets standard".</p> <p>Evidence Relied Upon: 33-103.005 Informal Grievance - Sex Abuse Reporting 33-103.006 Formal Grievance - Sex Abuse Reporting Inmate Handbook English</p>

115.53	Inmate access to outside confidential support services
	<p data-bbox="247 168 901 201">Auditor Overall Determination: Meets Standard</p> <p data-bbox="247 246 526 280">Auditor Discussion</p> <p data-bbox="247 324 1484 1131">The agency has a Memorandum of Agreement (MOA) to provide advocacy services to inmates who have been sexually victimized, with Haven of Lake & Sumter. The facility provides inmates with access to outside victim advocates for emotional support services through Haven of Lake & Sumter Contract. The inmates are provided a mailing address and a 24 hours toll-free hotline number to contact Haven of Lake & Sumter Contract. The auditor contacted Haven of Lake & Sumter, INC. shortly after the onsite audit. They have received calls from inmates at Lake during the past 12 months. There were no follow up requests after the initial calls. They are prepared to provide confidential, support services to the inmates at Lake if requested. This avenue enables the option of reasonable communication between inmates and the organization, in as confidential a manner as possible. A sexual abuse awareness brochure is also provided to the inmates. Information on how to report sexual abuse is indicated on the brochure, as well as an additional telephone (TIPS Line) in which the inmates can utilize to report. During the inmate interviews, they exhibited an understanding of the means by which they were to report, both at the facility level and externally. The majority of the inmates interviewed indicated that they felt comfortable reporting to staff at the facility. Inmates are not detained solely for civil immigration services/purposes. Based on the above agency procedures, the services offered as outlined in the agreement, based on documented information, and based on staff and inmate interviews, this standard is assessed as "meets standard".</p> <p data-bbox="247 1176 1348 1265">Evidenced Relied Upon: Procedure 602.053 Prison Rape Prevention, Detection, and Response - Victim Advocate Support</p>

115.54	Third-party reporting
	<p data-bbox="247 1460 901 1494">Auditor Overall Determination: Meets Standard</p> <p data-bbox="247 1538 526 1572">Auditor Discussion</p> <p data-bbox="247 1617 1484 1948">FDC Rule 33-103.006 provides guidance to third party reporting, including fellow inmates, staff members, family members, attorneys and outside advocates, and how to assist inmates in filing grievances alleging sexual abuse. Third parties are also permitted to file such grievances on behalf of inmates. During the interviews, inmates and staff relayed knowledge and understanding of available third party avenues. Additionally, the information on agency's web site encourages third parties to report allegations. FDC website at: http://www.dc.state.fl.us/PREA was reviewed by this auditor to ensure compliance with 115.54(a) . I verified that it contains the requisite information stipulated in this standard.</p>

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>In accordance with a review of agency Policy 602.053 (Prison Rape: Prevention, Detection, and Response) and interviews with random staff, Lake Correctional Institutional meets the mandate of this standard. Agency policies require all staff to immediately report and document sexual abuse and sexual harassment, including third-party and anonymous reports. Staff members are prohibited from discussing information related to sexual abuse reports with anyone other than those directly involved. Inmates are provided with information on how to report allegations of sexual abuse and/or sexual harassment upon their arrival during the intake process. Interviewed staff were also knowledgeable of their responsibility to report and document all allegations immediately to their supervisor, ranking security supervisor, warden, or assistant warden. Staff interviewed conveyed and confirmed methods of reporting allegations of sexual abuse and/or sexual harassment privately and not sharing information reported with those who have no need to know. Based on the above information, and interviews with staff, inmates, volunteers, contractors, investigative staff, and based on the observation of operations, including staff knowledge of duties and responsibilities, and training at Lake Correctional Institution the auditors assess this standard as "meets standard".</p> <p>Evidence relied upon: Procedure 602.053 Sexual Battery 33.794.027 Authorized Use of Force 33.944.35 Staff Training Curriculum</p>

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>In accordance with a review of agency Policy 602.053 Prison Rape: Prevention, Detection, and Response, staff interviews, and all relevant documentation, Lake Correctional Institution meets the mandate of this standard. Policies and the PREA training delivered to staff outline the immediate steps that are to be taken to protect inmates with a substantial risk of sexual abuse. Interviews with staff confirmed upon awareness that an inmate has been subjected to a substantial risk of imminent sexual abuse, the inmate is immediately removed from the area of potential threat. Each case is evaluated by the facility and investigative staff based upon the nature of the report to ensure the safety of the inmate. Precautionary measures may include increased supervisory rounds as appropriate and/or inmate at risk or potential predator may be moved to another housing unit. If no other options are available, one or both of the inmates may be considered for transfer to other agency facilities. There were five (5) inmates identified as subjected to a substantial risk of imminent sexual abuse during the past 12 months at Lake Correctional Institution. This standard is assessed as "meets standard".</p> <p>Evidence relied upon: Procedure 602.053 Prison Rape Prevention, Detection, and Response 33-602.220 Administrative Confinement - Protection Interviews with Staff</p>

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>In accordance with a review of agency Policy 602.053 Prison Rape: Prevention, Detection, and Response, staff interviews, and all relevant documentation, Lake Correctional Institution meets the mandate of this standard. Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the Warden of the facility receiving the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred. This notification shall occur as soon as possible, but no later than 72 hours upon becoming aware. The facility in which the allegation of sexual abuse and/or sexual harassment occurred is responsible for ensuring the allegation is investigated in accordance with these standards. Notification is made electronically by the Warden of one institution to the Warden of the other institution. Based on the FDC procedure, and the review of the procedure with the Warden, and the auditors review of the facility information and response, this standard is assessed as, "meets standard."</p> <p>Evidence relied upon: Procedure 602.053 Prison Rape Prevention, Detection, and Response - Warden Notification Staff Interviews</p>

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Agency Policy 602.053 Prison Rape: Prevention, Detection, and Response provides information detailing the duties of staff (both security and non- security) as related to responding to allegations of sexual harassment or acts of sexual abuse. All staff are considered and trained as first responders and are required to follow the instructions and guidelines as outlined. This includes the separation of the alleged victim from the alleged abuser, preservation of evidence and the crime scene and to not allow the victim or abuser to take any action that would destroy physical evidence if the alleged incident took place within a time frame that would still allow for collection of that evidence. A review of the training records indicates that staff is trained as first responders. Also, staff interviews corroborate that staff members (both security and non-security) are aware of and knowledgeable of their duties as related to the requirements of this standard. During the past 12 months there were fourteen (14) allegations of sexually abuse. Of these allegations, there were ten (10) instances in which the circumstances allowed for staff to separate the alleged victim and the abuser. Separation was initiated and achieved. Based on the above policies and procedures and interviews with staff, the auditors assess this standard as compliant, "meets standard".</p> <p>Evidence Relied Upon: Procedure 602.053 Prison Rape Prevention, Detection, and Response Interviews with Random Line Staff Interviews with Supervisory Staff</p>

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Lake Correctional Institution's PREA Coordinated Response Plan was reviewed and the plan coordinates actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership. Interviews of staff supported their knowledge of this plan and of their related duties and responsibilities. Based on the auditors' review of the PREA Coordinated Response Plan and based on interviews with medical, mental health, security staff, the PREA Manager and the Warden, the auditors assess this standard as "meets standard".</p> <p>Evidence Relied Upon: PREA Coordinated Response Plan Interviews with Medical/Mental Health Staff Interviews with Supervisory Staff First Responders</p>

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The most current Security Services Unit Agreement, dated December 2017-June 2020, does not limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.</p> <p>Evidence relied upon: 2017-2020 State of Florida & Police Benevolent Association – Security Services Unit Agreement</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Departmental procedure states that inmates and/or staff who report sexual abuse or sexual harassment shall be monitored for retaliation for a minimum of 90 days. The procedure describes specific guidelines to prohibit possible retaliation against any inmate or staff member who reported sexual abuse or sexual harassment. Staff interviews support knowledge of and adherence to the requirements of this standard. Classification staff is charged with monitoring for possible inmate retaliation and the assistant warden is charged with monitoring for possible staff retaliation. At Lake Correctional Institution, there were no reported incidents of retaliation during the past 12 months. Evidence Relied Upon: Procedure 602.053 Prison Rape Prevention, Detection, and Response</p>

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Procedure 602.053, Prison Rape: Prevention, Detection, and Response prohibits the placement of inmates who alleged to have suffered sexual abuse in segregated housing unless an assessment of all available alternatives has been made and there is no available means of separation from the likely abuser (for no longer than 72 hours). During the past 12 months, there were two (2) inmates who alleged sexual abuse who were held in involuntary segregation. The auditor reviewed segregation documentation and also toured the segregation units. No inmates were housed in the segregation units for protections from sexual abuse. The warden confirmed that placement in segregation is the final option when an inmate has alleged to have suffered sexual abuse and there is a need for separation. The Auditor determined the facility meets the requirements of this standard.</p> <p>Evidence Relied Upon: Procedure 602.053 Prison Rape Prevention, Detection, and Response 33-602.221 Protective Management Interview with Restrictive Housing Unit Staff</p>

115.71	<p>Criminal and administrative agency investigations</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The FDC Procedure 602.053, the FDC and Lake Correctional Institution have zero tolerance for sexual abuse and sexual harassment. All allegations of sexual abuse and sexual harassment are reported to the OIG for investigative purposes. The FDC also has two Procedures 108.003 Investigative Process, and 108.015 Sexual Battery, Sexual Harassment, and Sexual Misconduct Investigations that relate to criminal and administrative agency investigations. These procedures define the investigative process, inspector, and detail specific procedures and guidelines, including "for the investigation of sexual abuse, sexual battery, sexual misconduct, staff on inmate sexual harassment or voyeurism allegations within the Department of Corrections." The procedures also direct that the Office of the Inspector General be the primary investigative unit of all sexual battery allegations occurring on Department property and be the primary investigative unit of all sexual misconduct allegations occurring on Department property. Further, the procedures address incidents on institutional grounds; inspector responsibilities; sexual abuse/sexual harassment/voyeurism; reporting investigative findings to victims; administrative investigations; use of voice stress analysis or polygraphs; PREA survey forms; records retention; and specialized training. Substantiated allegations of conduct that appear to be criminal are referred for prosecution. In this reporting period since the last PREA audit, there have been zero (0) number of substantiated allegations of conduct that appear to be criminal that were referred for prosecution. The agency retains all written reports pertaining to investigations for as long as the abuser is incarcerated or employed by the agency plus 5 years. Subsections (a) - (l) were noted and reviewed by the auditors with key staff and OIG Investigators, and assessed as compliant. The auditors, based on the review of the FDC procedures, and interviews with the Warden, the investigators, the Institutional PREA Manager, and staff and inmates, Lake C I is in compliance standard as compliant, "meets standard".</p>
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115.72	<p>Evidentiary standard for administrative investigations</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>A review of agency procedure 108.033 indicates that the agency imposes a standard of a preponderance of evidence of proof when determining whether allegations of sexual abuse or sexual harassment are substantiated. This was confirmed during the interview with the senior investigator and is also documented in the investigation training.</p>
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115.73	Reporting to inmates
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1481 696">As outlined in Procedure 108.015 (Sexual Battery, Sexual Harassment, and Sexual Misconduct Investigations), the inmate making the allegation is required to be notified where the case made against another inmate results in an indictment and trial. He must also be notified of the outcome of this trial as well. Policy also requires that following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the facility informs the inmate (unless the investigation has determined that the allegation was unfounded) whenever the employee is no longer assigned on his unit and no longer employed in the facility. The inmate is also notified if the employee was indicted or charged and goes to trial.</p> <p data-bbox="252 752 1417 786">Evidence Relied Upon: Procedure 108.015 Procedure 602.053 Interview with Investigator</p>

115.76 Disciplinary sanctions for staff

Auditor Overall Determination: Meets Standard

Auditor Discussion

Based on review of procedures 33-208.003, 60L-36.005, 208.039 944.35 and interviews with the Security Supervisors, PREA Compliance Manager and PREA Investigator, staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. These procedures inform every employee that staff will be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. The Auditor's review of facility policy and procedures and interviews of staff determine that the facility meets the elements of this standard.

115.77 Corrective action for contractors and volunteers

Auditor Overall Determination: Meets Standard

Auditor Discussion

Reviewed procedures prohibit contractors or volunteers who engaged in sexual abuse to have contact with inmates and require they be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. In the past twelve months, there have been no contractors and/or volunteers reported to law enforcement for engaging in sexual abuse of inmates.

Evidence Relied Upon: Procedure 602.053 Prison Rape Prevention, Detection and Response - Corrective Action Contractor Volunteer

115.78 Disciplinary sanctions for inmates

Auditor Overall Determination: Meets Standard

Auditor Discussion

Rules 33-601.301 and 33-601.314 (Inmate Discipline) detail administrative sanctions for inmates guilty of sexual abuse and sexual harassment. Lake Correctional Institution inmates are subject to disciplinary sanctions following a finding that the inmate engaged in inmate on inmate sexual abuse or following a criminal finding of guilt for inmate on inmate sexual abuse. Staff on inmate sexual activity will be subject to disciplinary action and/or criminal prosecution for the staff member. A report of sexual abuse that is 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. In the past 12 months, there have been zero (0) number of administrative findings of inmate-on-inmate sexual abuse that have occurred at the facility. In the past 12 months, there have been zero (0) findings of guilt for inmate-on-inmate sexual abuse that have occurred at the facility. This information provided by the PAQ and discussed by the auditors with key staff. Based on the auditors' review of PREA documentation, agency's policies and procedures, observation of the operations at Lake Correctional Institution, and based on interviews with staff and inmates, the auditors assess this standard as compliant, "meets standard".

Evidence Relied Upon: 33-601.314 Rules of Prohibited Conduct and Penalties for Infractions
33-601.800 Close Management
33-601.301 Inmate Discipline

115.81 Medical and mental health screenings; history of sexual abuse

Auditor Overall Determination: Meets Standard

Auditor Discussion

Procedure 602.053 requires all inmates identified as high risk with a history of sexually assaultive behavior or sexual victimization be assessed by a mental health or other qualified professional within 14 days. The Auditor conducted a thorough review of policy and procedures, inmate medical records, and conducted interviews with medical and mental health practitioners, and inmates. After a thorough review the Auditor concluded the facility complies with the requirements of this standard.

Evidence Relied Upon: 602.053 Prison Rape Prevention, Detection, and Response - Mental Health Treatment

115.82 Access to emergency medical and mental health services

Auditor Overall Determination: Meets Standard

Auditor Discussion

Agency procedures require that inmates who are victims of sexual abuse be afforded immediate access to medical services, which includes forensic medical examinations and mental health services. During the onsite audit, the auditor interviewed medical and mental health staff. The interviewees stated that the aforementioned services are provided at no cost to the inmates.

Evidence Relied Upon: Procedure 602.053 Prison Rape Prevention, Detection, and Response
- Financial Cost Procedure 401.010 CO-Payment Requirements for Inmate Medical Encounter
- Financial Cost

115.83 Ongoing medical and mental health care for sexual abuse victims and abusers

Auditor Overall Determination: Meets Standard

Auditor Discussion

Agency procedure addresses all elements of the standard. Medical and mental health treatment including evaluations, on-going care, and treatment to all inmates that have been identified as victims and/or abusers are provided at no cost to the inmates and are consistent with the community level of care. During the onsite audit, the auditor interviewed medical and mental health practitioners. They indicated that the evaluation and treatment of anyone victimized includes, 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. They also stated that these treatment services are provided to victims without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. In addition, inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

Evidence Relied Upon: Procedure 602.053 Prison Rape Prevention, Detection, and Response
- Financial Cost Procedure 401.010 CO-Payment Requirements for Inmate Medical Encounter
- Financial Cost

115.86 Sexual abuse incident reviews

Auditor Overall Determination: Meets Standard

Auditor Discussion

Policy 602.053 (Prison Rape: Prevention, Detection, and Response) requires the institution to conduct a sexual abuse or sexual battery incident review within thirty (30) days of the conclusion of the investigation by completing the "Sexual Abuse Incident Review/Facility Investigation Summary." The incident review team at Lake Correctional Institution obtains input from line supervisors, investigators, and medical or mental health practitioners when needed. They are not responsible for conducting a review of any allegation that is unfounded. The review team gets input from line supervisors, investigators, and medical or mental health practitioners. In the past 12 months, there have been zero (0) criminal and / or administrative investigations of alleged sexual abuse at Lake Correctional Institution. In the past 12 months, there have been zero (0) criminal and/or administrative investigations of alleged sexual abuse completed at Lake Correctional Institution that were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents.

115.87 Data collection

Auditor Overall Determination: Meets Standard

Auditor Discussion

Policy 602.053 (Prison Rape: Prevention, Detection, and Response) requires uniform data be collected for every incident of sexual abuse alleged to have occurring at Lake Correctional Institution using a standardized instrument and set of definitions. Data from this facility is sent to the PREA Coordinator where it is aggregated annually from all of the agency facilities including the agency private facilities. All available incident-based documents, including reports, investigation files, shall be maintained, reviewed, and collected as needed to complete the SSV. Compliance based on the interview with PREA Compliance Coordinator.

115.88 Data review for corrective action

Auditor Overall Determination: Meets Standard

Auditor Discussion

Lake Correctional Institution has had a decrease from 29 PREA allegations in 2017 to 22 PREA allegations in 2018. The Department has provided additional training for PREA Compliance Managers as it relates to determining PREA cases. The PREA Coordinator and staff have been working extremely hard with the field staff in providing the appropriate direction in managing PREA Allegations. This has afforded both the staff and inmate population the opportunity to take advantage of the resources provided as well as bring about awareness on the issue. As such we can minimize the opportunity for the inappropriate behavior. In addition, Lake Correctional Institution received funding to assist with the monitoring of the inmate population. This has proven to be beneficial in the PREA monitoring process as well.

In 2018, Lake Correctional Institution did make any changes to its operation due to PREA cases by implementing additional cameras throughout the facility. In addition, adjustments were made to the shower doors located in the segregation unit. At this time, there are no other recommendations for corrective action. Lake Correctional Institution made efforts to fill all vacant positions in 2018 by conducting interviews for correctional staff on a weekly basis. The facility has implemented a Recruitment Basic Training Academy Program which is located at the Training Building on the institutional grounds. Our facility was granted 76 new officer positions in the Mental Health Unit which is instrumental to the monitoring process.

115.89 Data storage, publication, and destruction

Auditor Overall Determination: Meets Standard

Auditor Discussion

Policy 602.053 (Prison Rape: Prevention, Detection, and Response) requires investigative records, including but not limited to, criminal investigations, administrative investigations, medical evaluations and treatments, recommendations of post-release treatment, and counseling's associated with allegations of sexual abuse or sexual battery shall be retained by the agency for ten (10) years after the date of the initial collection or for the incarceration period of the victim or employment of the suspect or subject, plus five (5) years, whichever is longer. Compliance Managers are responsible for uploading all related documents to the facility's electronic retention file once a PREA case is completed. The PREA Compliance Manager confirmed this policy requirement and practice during her interview. PREA Reports and documentation is available on the agency web page <http://www.dc.state.fl.us/oth/prea/index.html>

115.401 Frequency and scope of audits

Auditor Overall Determination: Meets Standard

Auditor Discussion

The auditor was able to have complete access to and the opportunity to observe all areas of the audited facility. The audit team was able to request and to receive copies of any relevant documents (including electronically stored information). The audit team had access to all inmates and was able to conduct private interviews with randomly chosen or targeted inmates. The auditor received one confidential correspondence from an inmate in the same manner as if he were communicating with legal counsel.

115.403 Audit contents and findings

Auditor Overall Determination: Meets Standard

Auditor Discussion

The Florida Department of Corrections posts Final PREA Audit Reports on its agency website. A visit to the website shows final reports of past and recent audits.

Appendix: Provision Findings

115.11 (a) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment? yes

Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment? yes

115.11 (b) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

Has the agency employed or designated an agency-wide PREA Coordinator? yes

Is the PREA Coordinator position in the upper-level of the agency hierarchy? yes

Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities? yes

115.11 (c) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.) yes

Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.) yes

115.12 (a) Contracting with other entities for the confinement of inmates

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

115.12 (b) Contracting with other entities for the confinement of inmates

Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.) yes

115.13 (a) Supervision and monitoring

Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse? yes

In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse? yes

In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices? yes

In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy? yes

In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies? yes

In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies? yes

In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)? yes

In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population? yes

In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff? yes

In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards?	yes
In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes

115.13 (b) Supervision and monitoring

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

In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes

115.13 (d) Supervision and monitoring

Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment? yes

Is this policy and practice implemented for night shifts as well as day shifts? yes

Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility? yes

115.14 (a) Youthful inmates

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

115.14 (b) Youthful inmates

In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).) na

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

115.14 (c) Youthful inmates

Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).) na

Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).) na

Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).) na

115.15 (a) Limits to cross-gender viewing and searches

Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners? yes

115.15 (b) Limits to cross-gender viewing and searches

Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.) yes

Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.) yes

115.15 (c) Limits to cross-gender viewing and searches

Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches? yes

Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)? yes

115.15 (d) Limits to cross-gender viewing and searches

Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks? yes

Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks? yes

115.15 (e) Limits to cross-gender viewing and searches

Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status? yes

If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner? yes

115.15 (f) Limits to cross-gender viewing and searches

Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? yes

Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? yes

115.16 (a) Inmates with disabilities and inmates who are limited English proficient

Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing? yes

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

115.16 (b) Inmates with disabilities and inmates who are limited English proficient

Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient? yes

Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary? yes

115.16 (c) Inmates with disabilities and inmates who are limited English proficient

Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations? yes

115.17 (a) Hiring and promotion decisions

Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? yes

Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? yes

Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above? yes

Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? yes

Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? yes

Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above? yes

115.17 (b) Hiring and promotion decisions

Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates? yes

115.17 (c) Hiring and promotion decisions

Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check? yes

Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse? yes

115.17 (d) Hiring and promotion decisions

Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates? yes

115.17 (e) Hiring and promotion decisions

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

115.17 (f) Hiring and promotion decisions

Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions? yes

Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees? yes

Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct? yes

- 115.17 (g) Hiring and promotion decisions**
- Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination? yes
- 115.17 (h) Hiring and promotion decisions**
- Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.) yes
- 115.18 (a) Upgrades to facilities and technologies**
- If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.) na
- 115.18 (b) Upgrades to facilities and technologies**
- If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.) yes

115.21 (a) Evidence protocol and forensic medical examinations

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

115.21 (b) Evidence protocol and forensic medical examinations

Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) yes

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

115.21 (c) Evidence protocol and forensic medical examinations

Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate? yes

Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible? yes

If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)? yes

Has the agency documented its efforts to provide SAFEs or SANEs? yes

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

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

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

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

115.22 (a)	Policies to ensure referrals of allegations for investigations	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	na

115.31 (a) Employee training

Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment? yes

Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures? yes

Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment? yes

Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment? yes

Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement? yes

Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims? yes

Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse? yes

Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates? yes

Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates? yes

Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities? yes

115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	no
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes

115.32 (c)	Volunteer and contractor training	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	Inmate education	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
		During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	Inmate education	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
		Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
		Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	Inmate education	Have all inmates received such education?	yes
		Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes

115.33 (d) Inmate education

Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient? yes

Does the agency provide inmate education in formats accessible to all inmates including those who are deaf? yes

Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired? yes

Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled? yes

Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills? yes

115.33 (e) Inmate education

Does the agency maintain documentation of inmate participation in these education sessions? yes

115.33 (f) Inmate education

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

115.34 (a) Specialized training: Investigations

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

115.34 (b) Specialized training: Investigations

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

Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) yes

Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) yes

Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) yes

115.34 (c) Specialized training: Investigations

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

115.35 (a) Specialized training: Medical and mental health care

Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? yes

Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? yes

Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? yes

Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? yes

115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams.)	na
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere?	yes
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31?	yes
	Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.32?	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes

115.41 (c) Screening for risk of victimization and abusiveness

Are all PREA screening assessments conducted using an objective screening instrument? yes

115.41 (d) Screening for risk of victimization and abusiveness

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

115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: history of prior institutional violence or sexual abuse?	yes
 115.41 (f)	 Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes
 115.41 (g)	 Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a: Referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Request?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
 115.41 (h)	 Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes

115.41 (i) Screening for risk of victimization and abusiveness

Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates? yes

115.42 (a) Use of screening information

Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments? yes

Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments? yes

Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments? yes

Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments? yes

Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments? yes

115.42 (b) Use of screening information

Does the agency make individualized determinations about how to ensure the safety of each inmate? yes

115.42 (c)	Use of screening information	
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems?	yes
115.42 (d)	Use of screening information	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes
115.42 (e)	Use of screening information	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
115.42 (f)	Use of screening information	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes

115.42 (g) Use of screening information

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

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

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

115.43 (a) Protective Custody

Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers? yes

If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment? yes

115.43 (b) Protective Custody

Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible? yes

Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible? yes

Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible? yes

Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible? yes

If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The opportunities that have been limited? yes

If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The duration of the limitation? yes

If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The reasons for such limitations? yes

115.43 (c) Protective Custody

Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged? yes

Does such an assignment not ordinarily exceed a period of 30 days? yes

115.43 (d) Protective Custody

If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety? yes

If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged? yes

115.43 (e)	Protective Custody	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.51 (a)	Inmate reporting	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
		Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
		Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.51 (b)	Inmate reporting	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	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?	no

115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes

115.52 (c) Exhaustion of administrative remedies

Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)

yes

Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)

yes

115.52 (d) Exhaustion of administrative remedies

Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)

yes

If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)

yes

At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)

yes

115.52 (e) Exhaustion of administrative remedies

Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)

yes

Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)

yes

If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)

yes

115.52 (f) Exhaustion of administrative remedies

Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)

yes

After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)

yes

After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)

yes

After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)

yes

Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)

yes

Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)

yes

Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)

yes

115.52 (g) Exhaustion of administrative remedies

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

yes

115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	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)	 Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
 115.53 (c)	 Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
 115.54 (a)	 Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes

115.61 (a) Staff and agency reporting duties

Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency? yes

Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment? yes

Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation? yes

115.61 (b) Staff and agency reporting duties

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

115.61 (c) Staff and agency reporting duties

Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section? yes

Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services? yes

115.61 (d) Staff and agency reporting duties

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

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

115.64 (a) Staff first responder duties

Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser? yes

Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence? yes

Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? yes

Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? yes

115.64 (b) Staff first responder duties

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

115.65 (a) Coordinated response

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

115.66 (a) Preservation of ability to protect inmates from contact with abusers

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

115.67 (a) Agency protection against retaliation

Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff? yes

Has the agency designated which staff members or departments are charged with monitoring retaliation? yes

115.67 (b) Agency protection against retaliation

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

115.67 (c) Agency protection against retaliation

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? yes

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? yes

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation? yes

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports? yes

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes? yes

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes? yes

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff? yes

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff? yes

Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need? yes

115.67 (d) Agency protection against retaliation

In the case of inmates, does such monitoring also include periodic status checks? yes

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

- 115.71 (d) Criminal and administrative agency investigations**
- When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution? yes
- 115.71 (e) Criminal and administrative agency investigations**
- Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff? yes
- Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding? yes
- 115.71 (f) Criminal and administrative agency investigations**
- Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse? yes
- Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings? yes
- 115.71 (g) Criminal and administrative agency investigations**
- Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible? yes
- 115.71 (h) Criminal and administrative agency investigations**
- Are all substantiated allegations of conduct that appears to be criminal referred for prosecution? yes

- 115.71 (i) Criminal and administrative agency investigations**
- Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years? yes
- 115.71 (j) Criminal and administrative agency investigations**
- Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation? yes
- 115.71 (l) Criminal and administrative agency investigations**
- When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).) no
- 115.72 (a) Evidentiary standard for administrative investigations**
- Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated? yes
- 115.73 (a) Reporting to inmates**
- Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded? yes
- 115.73 (b) Reporting to inmates**
- If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.) na

115.73 (c) Reporting to inmates

Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit? yes

Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility? yes

Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility? yes

Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility? yes

115.73 (d) Reporting to inmates

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

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

115.73 (e)	Reporting to inmates	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.76 (c)	Disciplinary sanctions for staff	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	Disciplinary sanctions for staff	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
		Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes

115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
 115.77 (b)	 Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
 115.78 (a)	 Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
 115.78 (b)	 Disciplinary sanctions for inmates	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
 115.78 (c)	 Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes

- 115.78 (d) Disciplinary sanctions for inmates**
- If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits? yes
- 115.78 (e) Disciplinary sanctions for inmates**
- Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact? yes
- 115.78 (f) Disciplinary sanctions for inmates**
- For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation? yes
- 115.78 (g) Disciplinary sanctions for inmates**
- Does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.) yes
- 115.81 (a) Medical and mental health screenings; history of sexual abuse**
- If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? yes

115.81 (b) Medical and mental health screenings; history of sexual abuse

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

yes

115.81 (c) Medical and mental health screenings; history of sexual abuse

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

yes

115.81 (d) Medical and mental health screenings; history of sexual abuse

Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?

no

115.81 (e) Medical and mental health screenings; history of sexual abuse

Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?

yes

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

Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?

yes

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

If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62? yes

Do security staff first responders immediately notify the appropriate medical and mental health practitioners? yes

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

Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate? yes

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

Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident? yes

115.83 (a) Ongoing medical and mental health care for sexual abuse victims and abusers

Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility? yes

115.83 (b) Ongoing medical and mental health care for sexual abuse victims and abusers

Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody? yes

115.83 (h) Ongoing medical and mental health care for sexual abuse victims and abusers

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

yes

115.86 (a) Sexual abuse incident reviews

Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?

yes

115.86 (b) Sexual abuse incident reviews

Does such review ordinarily occur within 30 days of the conclusion of the investigation?

yes

115.86 (c) Sexual abuse incident reviews

Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?

yes

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

115.87 (c)	Data collection	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	Data collection	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	Data collection	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
115.87 (f)	Data collection	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.88 (a)	Data review for corrective action	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
		Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
		Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes

115.88 (b)	Data review for corrective action	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	Data review for corrective action	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	Data review for corrective action	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	Data storage, publication, and destruction	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	Data storage, publication, and destruction	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	Data storage, publication, and destruction	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes

115.89 (d) Data storage, publication, and destruction

Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise? yes

115.401 (a) Frequency and scope of audits

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

115.401 (b) Frequency and scope of audits

Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.) no

If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.) na

If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.) yes

115.401 (h) Frequency and scope of audits

Did the auditor have access to, and the ability to observe, all areas of the audited facility? yes

115.401 (i) Frequency and scope of audits

Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)? yes

115.401 (m) Frequency and scope of audits

Was the auditor permitted to conduct private interviews with inmates, residents, and detainees? yes

115.401 (n) Frequency and scope of audits

Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel? yes

115.403 (f) Audit contents and findings

The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports 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.) yes