

PREA Facility Audit Report: Final

Name of Facility: SCI Cambridge Springs

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 05/26/2017

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Robin Diebold	Date of Signature: 05/26/2017

AUDITOR INFORMATION	
Auditor name:	Diebold, Robin
Address:	
Email:	Robin.Diebold@wisconsin.gov
Telephone number:	
Start Date of On-Site Audit:	04/12/17
End Date of On-Site Audit:	04/13/17

FACILITY INFORMATION	
Facility name:	SCI Cambridge Springs
Facility physical address:	451 Fullerton Avenue, Cambridge Springs, Pennsylvania - 16403
Facility Phone	
Facility mailing address:	
The facility is:	<input type="radio"/> County <input type="radio"/> Federal <input type="radio"/> Municipal <input checked="" type="radio"/> State <input type="radio"/> Military <input type="radio"/> Private for profit <input type="radio"/> Private not for profit
Facility Type:	<input checked="" type="radio"/> Prison <input type="radio"/> Jail

Primary Contact			
Name:	Dr. Richard Learn	Title:	Classification and Program Manguer
Email Address:	rlearn@pa.gov	Telephone Number:	814-398-5400

Warden/Superintendent			
Name:	Joanne Torma	Title:	Superintendent
Email Address:	jotorma@pa.gov	Telephone Number:	814-398-5400, [REDACTED]

Facility PREA Compliance Manager			
Name:	Richard Learn	Email Address:	rlearn@pa.gov

Facility Health Service Administrator			
Name:	Shannon Anderson	Title:	Corrections Health Care Administrator
Email Address:	shananders@pa.gov	Telephone Number:	814-398-5400, [REDACTED]

Facility Characteristics			
Designed facility capacity:	1316		
Current population of facility:	1184		
Age Range	Adults: 20-77	Youthful Residents:	
Facility security level/inmate custody levels:	Custody Level 2 Institution; inmate custody levels 2 through 4		
Number of staff currently employed at the facility who may have contact with inmates:	334		

AGENCY INFORMATION	
Name of agency:	Pennsylvania Department of Corrections
Governing authority or parent agency (if applicable):	
Physical Address:	1920 Technology Parkway, Mechanicsburg, Pennsylvania - 17050
Mailing Address:	
Telephone number:	(717) 728-2573

Agency Chief Executive Officer Information:			
Name:	John Wetzel	Title:	Secretary
Email Address:	[REDACTED]	Telephone Number:	[REDACTED]

Agency-Wide PREA Coordinator Information			
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Name:	David Radzewicz	Email Address:	dradzewicz@pa.gov
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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.

SCI Cambridge was audited on April 11 & 12 by DOJ PREA Auditor Robin Diebold. A review of the pre-audit documents was completed prior to the on-site visit. An initial briefing was conducted with SCI Cambridge staff.

The Audit Notice was posted by March 1st, 2017. Notices as well as other PREA materials were seen on every housing unit and elsewhere throughout the facility.

From a list of current staff and inmates were randomly selected for interviews. There were 9 inmates and 17 staff that were interviewed. Staff from all three shifts were interviewed. One inmate from each unit was interviewed. These interviews covered at least one inmate from each interview category except for youthful inmates. The facility doesn't house youthful inmates. Additional staff and inmates were questioned about PREA knowledge and the facilities compliance with PREA while on the audit tour. All interviews were conducted in a private and confidential room.

A tour of the entire facility was conducted. The tour included all the General population housing units, Control, Warehouse, outside grounds crew building, Automotive, Storage building, Visitation, Control Bubble, Parenting trailer, Health Services Department, Infirmary, Medical exam rooms, dental, Maintenance department shops and Educational classrooms.

Interviews were conducted with SAFE/SANE staff were conducted by telephone.

Concerns were brought to the attention of DR. Richard Learn, PREA Compliance manager during the audit tour. These concerns were rectified by the facility.

On April 12th after the audit was completed an exit briefing was conducted. The staff at Cambridge are very dedicated in ensuring that the facility is compliant with PREA.

The security department provides a safe and secure facility for the public, staff, and inmates. The program uses a system of reinforcements and consequences to aid in managing the inmates, recognizing their social skills and emotional management skills through observing prosocial behaviors and decision making.

AUDIT FINDINGS

Facility Characteristics:

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

SCI-Cambridge Springs opened in March 1992. The facility houses female offenders. The facility bed capacity is 1316. The facility is a custody level two facility and offers offender work programs for those, incarcerated. and was formerly a college known as Polish National Alliance. The existing buildings were built in the 1930's and 1940's.

Housing Units E and F were constructed in 2012. Unit F is a modular unit. Unit E is has restrooms in the cell with the shower area located outside of the cell. The showers in Unit E have doors. Staff are not able to view the inmates torso.

Unit F is a dormitory style housing unit. The showers in unit F have curtains. Unit A, B, C, and D were part of the original college dorms. Unit A, C, and D have a shower and restroom area within each wing of the housing unit.

Unit B has a single shower and restroom within each room. Showers in these areas have curtains and restroom stalls have individual doors.

Total Acreage Inside Perimeter: 40 Total Acreage Outside Perimeter: 85

SCI Cambridge Springs currently has 242 cameras in use throughout the institution. The main monitoring area for the cameras is located in the Closed-Circuit Television room (CCTV) in the basement of building 1. These cameras also can be monitored by the Superintendent, Deputies, Major and Security Office. Most cameras can be monitored in the institution's Control Center in Building 1.

The following are the numbers and names of the buildings at SCI Cambridge:

Building #1 Administration Building #2 Warehouse Building #3 Medical/Property/Offices Building #4 Maintenance/Education Building #5 Sallyport Building #6 Dietary Building #7 Laundry Buildings#8/#9 Building #10 Storage Building #11 Commonwealth Residence Building #12 Automotive/Outside Grounds Building #13 Activities Trailer Building #14 Parenting Building #15 Commonwealth Residence Building #16 Pole Building Storage

SCI Cambridge Springs' educational programming currently consists of three components, academic education, vocational training, and re-entry preparation. Academic teachers focus on GED/ACSD preparation and Adult Basic Education (ABE).

The facility has vocational programming that includes Optical, Custodial Maintenance, Business Education and Cosmetology. As well as re-entry classes that prepare offenders for their release. The classes provide students with employment and financial skills, OSHA training, custodial maintenance competencies, skills in developing positive relationships and basic computer skills.

There are several other opportunities for offender programming, these include but are not limited to: Victim Awareness Education, Impact of Crime, Positive Relationships, Abuse Group, Sex Offender Program Evaluation, Sex Offender Program Moderate-High Intensity, Sex Offender Program Booster, Narcotics Anonymous,

Alcoholics Anonymous, Al-Anon, Alcohol and Other Drug Outpatient, Co-Occurring Outpatient, Individual Counseling, Basic Parenting Skills, Pennsylvania Family Support Group, Mom's Story Time, Family Therapy, and Religious Volunteer study groups

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.

Number of standards exceeded:	2
Number of standards met:	39
Number of standards not met:	0
Number of Standards Not Applicable: (The total number of standards that were audited at the agency level)	4

The results of the audit indicate that the facility is in full compliance with PREA Standards. A final report is being issued. The facility staff, in particular Dr. Richard Learn, were very helpful, very professional, and well versed in PREA activities at the facility level. The facility response to offender privacy concerns confirms the facility commitment ensuring to the safety of all. offenders. It was a pleasure to work with Superintendent Torma and her staff.

Number of standards exceeded: 2

Number of standards met: 37

Number of standards not met: 0

Number of standards not applicable: 4

Standards
<p>Auditor Overall Determination Definitions</p> <ul style="list-style-type: none"> • 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)
<p>Auditor Discussion Instructions</p> <p>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.</p>

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	<p>Auditor Overall Determination: Exceeds Standard</p>
	<p>Auditor Discussion</p> <p>There is a written policy, DC-ADM 008 that addresses zero tolerance towards sexual assault and sexual harassment. The policy addresses the implementation of the agency's approach to preventing, detecting and responding to sexual harassment and abuse. Policy also provides the rules of conduct between inmates and employees, specifically prohibited behaviors as are defined in the Prison Rape Elimination standards.</p> <p>David G. Radziewicz is the statewide PREA Coordinator. He has the authority to develop and implement the agencies efforts in PREA compliance.</p> <p>PREA compliance Manager Dr. Richard Learn states that he has enough time to complete his PREA responsibilities.</p> <p>During the audit the staff interviewed showed a pocket card that details exactly what to do in the event an offender reports sexual assault/harassment. Staff show a commitment to maintaining the agency's zero tolerance policy.</p>

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Cambridge Springs has not entered into any new contracts since the last audit. DC-ADM 008 section 2 states, The department shall include in any new contract or contract renewal for the housing of an inmate with private entities, including other government agencies, the agencies obligation to comply with PREA standards and the Department's policies related to PREA compliance.</p> <p>Contracted entities shall undergo regular mandated audits on a three-year basis as required by the PREA Standards.</p> <p>All contracted entities are expected to have an official PREA audit by a certified Department of Justice, (DOJ) auditor once every three year audit cycle as directed in the PREA standards. The Department will provide contract monitoring to ensure PREA compliance.</p>

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>6.3.1, Facility Security Procedures Manual Section 19 – Managerial Visits/Inspections prohibits staff from alerting other staff that supervisory rounds are being conducted. Rounds are conducted on all shifts. Staff are required to sign in on a bound log book and documented on a monthly basis.</p>

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	N/A This facility has not housed youthful inmates since it's last auditing period.

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 as well as Facility Procedures Manual searches section 30 provides staff with guidelines for conducting searches.</p> <p>These guidelines prevent staff from conducting cross-gender pat and strip searches. All cross-gender strip searches are to be documented on the Cross Gender Strip search validation form. This form is maintained by the security office. Non Medical staff are prohibited from performing visual body cavity searches. These searches are only to be conducted by medical practitioners. All cross-gender searches are documented on he facility does not allow cross-gender pat searches except for in exigent circumstances. All searches are to be conducted in a professional manner.</p> <p>These guidelines prohibit staff from conducting a strip search to determine an inmate's genital status. This is to be determined by means other than a strip search by a medical professional DC-ADM 008 states that staff of the opposite gender shall announce their presence when entering an inmate housing unit in accordance with the following: (28 C.F.R. §115.15[d])</p> <p>DC-ADM 008 notes procedures and policy that allow inmates to shower, perform bodily functions, and change clothing without being viewed by cross-gender staff.</p>

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 006 Addresses the agencies commitment to provide inmates with disabilities or limited English proficiency appropriate means to participate in all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.</p> <p>Agency has a contract with an interpreting service PROPIO LS LLC.</p> <p>Signage is in both English and Spanish.</p> <p>Pursuant to Department policy DC-ADM 006, "Reasonable Accommodations for Inmates with Disabilities," the Department shall ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the Department's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. (28 C.F.R. §115.16[a])</p> <p>The Department shall take reasonable steps to ensure meaningful access to all aspects of the Department's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient, including steps to provide qualified interpreters.</p> <p>The PCM shall ensure that only staff members or qualified contractors who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary, provide translation for inmates. (28 C.F.R. §115.16[b][c]) If a multi-lingual staff member is not available, then the current contracted translation service must be utilized.</p>

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>4.1.1 Human resources manual section 41 confirms commitment to not hire or promote any person who has engaged in sexual abuse in a prison, jail, lock up or community confinement facility, juvenile facility or other institution.</p> <p>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 didn't consent or was unable to consent.</p> <p>The agency considers sexual harassment in determination of hiring or promoting of employees or enlisting the services of a contractor. The agency requires background screenings to be conducted prior to new staff having contact with inmates.</p> <p>Application for employment clearly states Failure to list conviction will be considered a deliberate falsification and will be grounds for removal of consideration from employment.</p> <p>Facility not only conducts background checks but also uses JNET. JNET informs the facility immediately if a current staff member has been arrested.</p>

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility has not added any new buildings but did recently add cameras and has a plan for additional cameras as budget allows. This was documented in meeting minutes. The DC-ADM 800 states: when installing or updating a video monitoring system, electronic surveillance system or other monitoring technology the department shall consider how such technology may enhance the department's ability to protect inmates from sexual abuse.</p>

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Staff have pocket cards to enable them to properly respond to an allegation of sexual assault/abuse. During the audit interviews staff were able to detail how to respond to an allegation and the steps to take to preserve evidence.</p> <p>DC-ADM 008, Prison Rape Elimination Act (PREA) Procedures Manual Attachment 4-E Section 4 –Responding to Reports of Sexual Abuse Details steps to take for preservation of evidence</p> <p>DC-ADM 008, Prison Rape Elimination Act (PREA) Procedures Manual Section 5 – Investigating Allegations of Sexual Abuse and/or Sexual Harassment addresses procedures for administrative and criminal investigations. All criminal investigations are handled by Pennsylvania State Police (PSP). The institution has a MOU with PSP as well as a letter to them requesting them to follow PREA standards.</p> <p>DC-ADM 008 PREA Procedures Manual section 4 D. 1 & 2 page 4-2-4-3 State that the victim shall be transported to an outside hospital if the assault occurred with in the last 96 hours. This is provided at no cost to the inmate.</p> <p>During the last year one inmate sent to the hospital after an allegation of sexual abuse that involved penetration. Hospital staff and the PA State Police determined that the inmate did not need to have an examination by a SANE.</p> <p>A letter of Agreement with Meadville Medical Facility Meadville PA and a letter of agreement with Crawford Women's center were provided. These letters cover the SANE exam as well as for advocacy support.</p>

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A sample of allegations of sexual assault and sexual abuse investigations were reviewed and shows that the investigations are completed promptly and thoroughly. The institution has a computer tracking system for all investigations. In the past 12 months there have been 46 allegations all of which were investigated. 22 were referred for criminal investigation. There are 3 investigations currently in progress as well as 2 others that were referred to PSP that haven't concluded.</p> <p>DC-ADM 008 section 5 pg 5-1 A 1 states, If the case is being investigated for criminal charges, the Department investigators shall suspend the administrative investigation and allow the criminal investigation to take precedence. The Security Office and/or Office of Special Investigations and Intelligence (OSII) shall coordinate with the criminal investigator/District Attorney's Office (as applicable) to determine when to resume the administrative investigation so as to avoid interference with the criminal investigation.</p> <p>Agency PREA Policy is published on the PA DOC website</p> <p>The agency documents all referrals of allegations utilizing a Response to allegation of sexual abuse checklist.</p>

115.31	Employee training
Auditor Overall Determination: Meets Standard	
Auditor Discussion	
<p>DC-ADM 008, Prison Rape Elimination Act (PREA) Procedures Manual Section 2 – Sexual Abuse/Sexual Harassment Prevention and Training¹. Employee Training (Basic Training)</p> <p>The PCM, in conjunction with the Training Coordinator at each facility, shall ensure that all employees who have contact with inmates receive the following training: (28 C.F.R. §115.31[a])</p> <p>(1) the zero tolerance policy against sexual abuse and sexual harassment within the Department; (28 C.F.R. §115.31[a][1])</p> <p>(2) how staff are to fulfill their responsibilities under the Department’s sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures as defined in this policy; (28 C.F.R. §115.31[a][2])</p> <p>(3) inmates’ right to be free from sexual abuse and sexual harassment; (28 C.F.R. §115.31[a][3])</p> <p>(4) the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; (28 C.F.R. §115.31[a][4])</p> <p>(5) the dynamics of sexual abuse and sexual harassment in confinement; (28 C.F.R. §115.31[a][5])</p> <p>(6) the common reactions of sexual abuse and sexual harassment victims; (28 C.F.R. §115.31[a][6])</p> <p>(7) how to detect and respond to signs of threatened and actual sexual abuse; (28 C.F.R. §115.31[a][7])</p> <p>(8) how to avoid inappropriate relationships with inmates; (28 C.F.R. §115.31[a][8])</p> <p>(9) how to communicate effectively and professionally with inmates, including LGBTI or gender nonconforming inmates; and (28 C.F.R. §115.31[a][9])</p> <p>(10) how to comply with relevant laws of Pennsylvania related to mandatory reporting of sexual abuse to outside authorities. (28 C.F.R. §115.31[a][10])</p> <p>Newly hired staff members shall receive this training as part of basic training at the Training Academy.</p> <p>Beginning in 2016, and every even numbered year thereafter, the annual PREA education shall be provided in the form of a refresher of the initial basic staff training information for all staff members. Staff shall be required to verify that they have received the updates and understand the included items on the PREA Training and Understanding Verification Form</p>	

(Attachment 2-F) to be kept in the staff member's training file in accordance with Section 1 of this procedures manual. (28 C.F.R. §115.31[c][d])

dBeginning in 2017 and every odd numbered year thereafter, the annual PREA education shall be provided in the form of an update to this procedures manual for all staff members. Staff shall be required to verify that they have received the information and understand the included items on the PREA Training and Understanding Verification Form. This information shall be kept in the employee's training file in accordance with Section 1 of this procedures manual. (28 C.F.R. §115.31[c][d])

Staff shall receive training in accordance with Department policy 5.1.1, "Staff Development and Training." Such training shall be tailored to the gender of the inmates at the employee's facility. The employee shall receive additional training if the employee is reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa. (28 C.F.R. §115.31[b])

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 requires Contractors and volunteers (to include contract service providers, public visitors, or Non-Department Employees) shall receive training on their responsibilities under the Department's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. They shall be trained during orientation sessions and annual training reflective of the level of contact that they have with inmates. (28 C.F.R. §115.32[a])</p> <p>(a) Level 1 – For contractors and volunteers who have a high level of contact (five hours or more per week on average) with inmates, the training shall be the same as regular staff members receiving both pre-service and annual training. (28 C.F.R. §115.32[b])</p> <p>(b) Level 2 – For volunteers who have a sporadic level of contact (less than five hours per week on average) with inmates, they shall receive a brief orientation by the volunteer coordinator/designee to include information on the Department's zero tolerance policy, how to make a report, and to whom to make a report. The Contractors/Volunteers PREA Training (Attachment 2-G) shall be utilized for training with Level 2. The Volunteer Coordinator/designee shall be responsible for providing the Contractors/Volunteers PREA Training to all Level 2 volunteers. Once this information is reviewed, the trainee shall keep a copy of the Contractors/Volunteers PREA Training.</p> <p>(c) Level 2 – For contractors who have a sporadic level of contact (less than five hours per week on average) with inmates, they shall receive a brief orientation by the Security Office in conjunction with the Security Briefing required by Department policy 6.3.1 to include information on the Department's zero tolerance policy, how to make a report, and to whom to make a report. The Contractors/Volunteers PREA Training shall be utilized for training with Level 2. The Security Office in conjunction with the Security Briefing required by Department policy 6.3.1 will be responsible for providing this outline to all Level 2 contractors. Once this information is reviewed, the trainee shall keep a copy of the Contractors/Volunteers PREA Training.</p> <p>(2) All contractors and volunteers shall be required to sign and acknowledge the PREA Training and Understanding Verification Form. (28 C.F.R. §115.32[b]) The Volunteer Coordinator at each facility shall be responsible for documenting the PREA training that each volunteer has received and maintain the documentation in the volunteer file in accordance with Section 1 of this procedures manual. PCMs shall be responsible for maintaining PREA Training and Understanding Verification Forms for all contractors. PREA Training shall be effective for a period of one year. (28 C.F.R. §115.32[c])</p> <p>(3) Any contractor or volunteer that has multi-facility access should request and maintain a copy of the PREA Training and Understanding Verification Form for provision to the PCM or Volunteer Coordinator at each subsequent facility.</p>

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>DC-ADM 008 requires inmates to be provided education explaining the zero tolerance policy regarding sexual abuse and sexual harassment, and how to report incidents or suspicions of sexual abuse, sexual harassment or retaliation, and what to do if he/she is the victim of such. This information shall be provided in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills.</p> <p>During the intake process, all inmates, including Parole Violators (PVs), shall receive information explaining the zero tolerance policy regarding sexual abuse and sexual harassment, and how to report incidents or suspicions of sexual abuse, sexual harassment or retaliation, and what to do if he/she is the victim of sexual abuse, sexual harassment, or retaliation. Medical shall provide a copy of the Sexual Assault Awareness Informational Handout (Attachment 2-H) to the inmate immediately upon intake.</p> <p>Within the first 30 days of reception, additional information shall be provided to all inmates, including PVs, either during orientation at the Diagnostic and Classification Center (DCC) and reception sites, or upon return to Department custody. All inmates shall be shown a video regarding their rights to be free from sexual abuse, sexual harassment, and retaliation. They shall also be provided information regarding Department policies and procedures for responding to such incidents. Inmate education may be provided to inmates individually or in groups. A staff member must be present at all times to facilitate discussion, in conjunction with the National PREA Resource Center Inmate Education Facilitator’s Guide PREA: What You Need To Know and to answer questions.</p> <p>The PREA video, “PREA: What You Need To Know” is shown to the inmates. This video in Spanish and English, with subtitles.</p> <p>An intake counselor shall remain in the room during the playing of the video to observe inmates, looking for reactions.</p> <p>Additionally, the intake counselor shall ask questions, as outlined in the Facilitator’s Guide, at the end of the video to determine comprehension of the materials.</p> <p>The intake counselor shall offer to meet privately with any inmates if they request to discuss issues related to the video. This video is also shown a minimum of 2 times a month on the inmate channel.</p> <p>NOTE: Any inmate that is transferred must receive education upon transfer, only to the extent that the policies and procedures of the inmate’s new facility differs from those of the previous facility. (28 C.F.R. §115.33[c])</p> <p>During the inmate’s annual review, the counselor shall discuss issues related to sexual abuse in prison and offer the inmate an opportunity to discuss related concerns. The counselor shall provide a Sexual Assault Awareness Informational Handout at the time of his/her annual review.</p> <p>Sexual abuse, sexual harassment, and retaliation training shall be documented by the inmate signing the PREA Inmate Education Verification Form. This form shall be filed in the DC-14 in accordance with Section 1 of this procedures manual. (28 C.F.R. §115.33[e]). Provision of PREA Inmate Education shall be documented in an Inmate Cumulative Adjustment Record (ICAR) entry.</p> <p>During the tour of the institution PREA Posters in both English and Spanish were easily visible</p>

throughout the institution as well as in Restricted Housing.

During interviews with the inmates it was verified that they received the PREA education either upon orientation to the institution. During interviews with inmates who have been at the institution for longer than the education guidelines have been in effect it was verified that they received the PREA education.

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 section 2 states:</p> <p>(1) Any staff designated to conduct sexual abuse investigations shall receive training in accordance with 28 C.F.R. §115.34[a].</p> <p>(a) This specialized training shall include, but is not limited to: interviewing sexual abuse victims, proper use of Miranda warnings, the Garrity rule, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecutorial referral. (28 C.F.R. §115.34[b])</p> <p>(b) This training shall be developed by the PCD and standardized for Department wide training purposes.</p> <p>(2) This specialized training shall occur on an annual basis unless it is deemed necessary to be held more frequently by the statewide PREA Coordinator or Facility Manager.</p> <p>(3) Staff shall be required to sign off that they have received the information and understand the included items on the PREA Training and Understanding Verification Form unless completed through web-based training. This information shall be kept in the staff member's training file in accordance with Section 1 of this procedures manual. (28 C.F.R. §115.34[c])</p> <p>(4) The Department, any state entity, or Department of Justice component that investigates sexual abuse in confinement settings shall provide such training to its agents and investigators who conduct such investigations. (28 C.F.R. §115.34[d])</p> <p>There are currently 12 trained staff investigators who received the required specialized training.</p> <p>An interview with investigative staff confirmed the practice confirmed the practice.</p>

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 Section 2 states Any staff providing medical/mental health services, whether on a full or part-time status, shall receive additional training on working with victims of sexual abuse and sexual harassment. (28 C.F.R. §115.35[d]) For the purposes of this training requirement, medical staff shall include all licensed medical staff, as well as non-licensed contact medical staff such as dental assistants, Correctional Health Care Administrators (CHCAs), and contracted provider staff.</p> <p>(a) This specialized training shall include, but is not limited to: 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. (28 C.F.R. §115.35[a][1][2][3][4])</p> <p>(b) This training shall be developed by the PCD and standardized for Department wide training purposes.</p> <p>(c) All new medical/mental health staff shall receive this training within the first six months of employment with the Department. The training shall either be provided by the current contracted medical health provider or locally by staff who have been trained.</p> <p>(d) Staff shall be required to sign off that they have received the information and understand the included items on the PREA Training and Understanding Verification Form. This information shall be kept in the employee's training file in accordance with Section 1 of this procedures manual. (28 C.F.R. §115.35[c])</p> <p>Training records as well as the materials used to train staff were provided to show that all Medical and Mental health staff have been trained in accordance with procedures manual DC-ADM 008 and the PREA Standards. Interviews during the audit confirm that staff are trained in PREA.</p> <p>All forensic exams are performed by Meadville Medical Center not by facility staff.</p>

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 section 2 states that PREA Screening is performed upon admission or transfer utilizing the PREA Assessment Tool (PRAT.) Inmates are then followed up after 20-30 days after the initial screening. Inmates interviewed confirmed this was done.</p> <p>The PRAT is used to make individualized determinations of housing and bed assignments while keeping the goal of separating high risk victims from high risk sexual aggressors. When there is an allegation of sexual abuse, the Licensed Psychology Manager (LPM)/designee shall administer the PRAT to all involved inmates within 72 hours of the allegation being made.</p> <p>An inmate's risk level shall be reassessed by the PCM, utilizing the PRAT, when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of victimization or abusiveness.</p> <p>Inmates are not disciplined for refusal to answer or for not disclosing complete information in response to the questions regarding prior victimization, disabilities, their perception of vulnerability, or their sexual orientation.</p> <p>Any information related to sexual victimization or abusiveness occurring in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans, security and management decisions, including housing, bed placement, work, education, and program assignments, or otherwise required by Federal, State, or local law</p>

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PRAT is used to make individualized determinations of housing and bed assignments while keeping the goal of separating high risk victims from high risk sexual aggressors. Documentation was provided of inmates at risk of victimization and risk of assault. Staff use the PRAT to determine housing. There is a list of Potential Victim and Abusers. these tools are utilized to make individualized determinations of safety for each inmate.</p> <p>Sample documents were provided to show that the facility meets with Transgender or intersex inmates and makes housing and program assignments on a case by case basis. Transgender inmates are reassessed at least twice a year to review any threats to the inmate's safety. The interviews conducted verify that transgender or intersex inmate's views on their safety are given serious consideration.</p> <p>All inmates are given the opportunity to shower in a separate shower. There are no group showers in the facility. Transgender/Intersex/Gay/Lesbian Inmates are not placed in housing units, wings, or dedicated facilities solely on the basis of identification or status, unless such placement is in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates</p>

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>There have been 0 inmates placed in segregated housing for risk of sexual victimization/who allege to have suffered sexual abuse. This was verified with a list of inmates who had reported sexual abuse and their housing unit.</p> <p>DC-ADM 008 states:</p> <p>Inmates at a high risk for sexual victimization or inmates who have allegedly suffered sexual abuse shall not be placed involuntarily in Administrative Custody (AC) as a means of protection unless an assessment of all available alternatives has been made by Psychology and Security staff in conjunction with the Facility Manager/designee, and a determination has been made that there is no other available alternative means of separation from likely abusers. If the facility cannot conduct the assessment immediately, the facility may hold the inmate in involuntary AC for less than 24 hours while completing the assessment. (28 C.F.R. §115.43[a]) (28 C.F.R. §115.68)</p> <p>The staff must consider other alternative placements for an alleged victim and make the appropriate placement. (28 C.F.R. §115.43[c])</p> <p>Placement in AC is permissible when the alleged victim requests or agrees to it.</p> <p>Alternative placements can include, but are not limited to, any one, or combination of, the following temporary options:</p> <ol style="list-style-type: none"> (1) moving to a different housing unit; (2) placement in a cell closer to the Corrections Officer's desk within the unit; (3) Z-Code; and/or (4) placement in the Special Needs Unit (SNU). <p>If an involuntary AC housing assignment is made in accordance with Subsection A.6.a. above, the Shift Commander shall clearly document on the DC-141, Part Report, the following information: (28 C.F.R. §115.43[d])</p> <ol style="list-style-type: none"> (1) the basis for the staff member's concern for the inmate's safety; (28 C.F.R. §115.43[d][1]) (2) the other alternative means of separation that were explored; and (3) the reason why no alternative means of separation can be arranged. (28 C.F.R. §115.43[d][2]) <p>If the Shift Commander assigns an inmate to involuntary AC for the purpose of protection from sexual victimization, access to programs, privileges, education, or work opportunities shall be afforded to that inmate to the extent possible. If the facility restricts access to these opportunities, the facility shall document in the Involuntary Administrative Custody Services Access Restriction Form (Attachment 2-C): (28 C.F.R. §115.43[b])</p> <ol style="list-style-type: none"> (1) the opportunities that have been limited; (28 C.F.R. §115.43[b][1]) (2) the duration of the limitation; and (28 C.F.R. §115.43[b][2]) (3) the reasons for such limitations. (28 C.F.R. §115.43[b][3]) <p>The facility may assign inmates to involuntary AC only until an alternative means of separation from likely abusers can be arranged and such assignment shall not ordinarily exceed 30 days. (28 C.F.R. §115.43[c])</p> <p>In accordance with Department policy DC-ADM 802, "Administrative Custody Procedures," at least every 30 days, the Program Review Committee (PRC) shall ensure each inmate is reviewed to determine whether there is a continuing need for separation from the general</p>

population. This review shall be documented

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Inmates have several ways to report sexual abuse or sexual harassment. There are PREA posters in English and Spanish posted throughout the institution. On the posters it gives the ways to report.</p> <p>DC-ADM 008 states: Methods of reporting include the following: verbal report to a staff member; submitting a DC-135A, Inmate Request to Staff Member; and/or submitting a written report to the Sexual Abuse Reporting Address: BCI/PREA Coordinator, 1800 Elmerton Avenue, Harrisburg, PA 17110.</p> <p>These written reports may be submitted, either as identified above, or through the facility grievance lock-boxes located on every housing unit within the facility. These lock-boxes are accessed only by an approved management staff, and reports shall be forwarded for review and action, as outlined within this policy. Inmates shall utilize the inmate grievance system in accordance with Department policy DC-ADM 804, "Inmate Grievance System," to report inmate-on-inmate sexual harassment allegations, which include repeated and unwelcome sexual advances, requests for sexual favors, verbal comments, gestures, or actions of a derogatory or offensive sexual nature.</p> <p>Every inmate must be provided with immediate access to at least one of the methods indicated above through which he/she may privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.</p>

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	N/A The PA Department of Corrections does not have administrative procedures to address inmate grievances regarding sexual abuse.

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>DC-ADM 008 states: The Department works in collaboration with the Pennsylvania Coalition Against Rape (PCAR) and its member centers. The facility PCM, in conjunction with the statewide PREA Coordinator/designee has worked to establish mutual agreements with local rape crisis centers where all Department facilities are located. (28 C.F.R. §115.53[c])</p> <p>The PCM shall ensure that inmates are offered and provided with access to outside victim advocates for emotional supportive services related to sexual abuse which has occurred in a confinement setting. During non-working hours, the Shift Commander shall be responsible to ensure the aforementioned support services. Supportive services may be provided via a variety of methods including in person, during a non-monitored phone call, and/or in writing. The preferred service delivery method is in person in a confidential setting. (28 C.F.R. §115.53[a])</p> <p>The PCM shall inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws. (28 C.F.R. §115.53[b])</p> <p>An inmate shall be offered the opportunity to talk with a victim advocate upon receipt of an allegation and receive continued care when they have been a victim of facility sexual abuse, no matter if they reported the facility sexual abuse immediately or made a delayed disclosure. If the inmate is taken to a local hospital for a forensic examination, they should be afforded the opportunity for support services provided by a victim advocate. If requested, the victim advocate shall meet the alleged victim at that hospital to accompany and support the alleged victim through the forensic medical examination process and investigatory interview. They shall also provide emotional support, crisis intervention, information, and referrals. (28 C.F.R. §115.21[d][e])</p> <p>If the inmate discloses outside the 96 hour timeframe, the facility PCM shall make arrangements for the victim advocate to meet with the inmate at the facility or via telephone, if the alleged victim wishes to speak with an advocate. This meeting should occur in a private area with video surveillance and no audio to ensure confidentiality. The safety of the victim advocate should be paramount in determining where the interaction will occur.</p> <p>Women's Services provides counseling for those who have been victims of sexual abuse. This counseling is provided whether the abuse occurred at this institution or in any other settings. She has appointments on Mondays and Tuesdays each week.</p> <p>Inmates are provided information via a brochure</p> <p>Inmates are able to speak with the counselor in a confidential manner. The inmates are informed of the limits of confidentiality.</p> <p>the facility has a Letter of Agreement with Women's Services. Women's Services confirmed that they would provide victim advocate services to SCI Cambridge inmates.</p>

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 states: The Sexual Abuse Reporting Address is an option for the general public to report an allegation of sexual contact. The reporting address is: BCI/PREA Coordinator, 1800 Elmerton Avenue, Harrisburg, PA 17110.</p> <p>A writer may choose to include his/her name and contact information, but it is not necessary in making a report; complaints can be made anonymously.</p> <p>This information is on PREA posters throughout the institution as well as on the DOC website.</p>

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 states: Any staff member, contract service provider, and volunteer shall immediately report to the Shift Commander if he/she has knowledge, suspicion, or information regarding any of the following:</p> <ul style="list-style-type: none"> a. sexual abuse of an inmate; b. sexual harassment of an inmate that occurred in a facility; c. retaliation against inmates or staff who reported such an incident; and/or d. staff neglect or violation of responsibilities that may have contributed to an incident or retaliation <p>NOTE: The incidents listed above may have occurred in any confinement facility, whether or not it is affiliated with the Department.</p> <p>DC-ADM 008 Section 3 states: Apart from reporting to designated supervisors or officials, staff shall not reveal any information related to a sexual abuse allegation to anyone other than to the extent necessary, to make treatment, investigation, and other security and management decisions, where sexual abuse with an inmate is reported.</p> <p>DC- ADM 008 requires all medical and mental health staff to report sexual abuse and that the limits of confidentiality be disclosed to the inmates.</p> <p>The facility doesn't house youthful inmates.</p>

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 Section 2 states :Ensure that when Department staff learn that an inmate is subject to a substantial risk of imminent sexual abuse, appropriate and immediate action shall be taken to protect that inmate.</p> <p>the facility has not had an instance in the last 12 month where an inmate was at immediate risk of sexual assault.</p> <p>Based on interviews with random and specialized staff it was determined that the immediate protective measures the facility would take to protect an inmate at substantial risk of imminent sexual abuse would be to separate the victim from the potential aggressor and place the victim in a safe location where they can be monitored by staff.</p>

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 Section 3 states:</p> <p>a. An inmate may file a report of sexual abuse sustained while confined at another facility. (28 C.F.R. §115.63[a])</p> <p>b. It is the Facility Manager/designee's responsibility to notify the head of the facility in which the reported abuse occurred. (28 C.F.R. §115.63[a]) Notification must be provided as soon as possible, but no later than 72 hours after receipt of information and documented on the Notification of Sexual Abuse Allegation to Another Facility (Attachment 3-B). This document shall be maintained by the PCM in an annual file for audit verification purposes in accordance with Section 1 of this procedures manual. (28 C.F.R. §115.63[b][c])</p> <p>c. A copy of the notification must also be sent to the facility PCM for audit verification purposes.</p> <p>d. Both PCMs shall coordinate the information flow to ensure:</p> <p>(1) a thorough and expedient investigative process follows; and</p> <p>(2) the inmate receives information regarding the investigative outcome in a confidential and timely manner as to comply with Section 8 of this procedures manual.</p> <p>2. Reports Received from Other Confinement Facilities</p> <p>a. Upon receipt of an allegation from another facility that an inmate was sexually abused while confined at that location, the Facility Manager/designee at the receiving facility shall document the receipt of the allegation on the Notification of Sexual Abuse Allegation to Another Facility. (28 C.F.R. §115.63[a][d])</p> <p>b. The Facility Manager/designee shall immediately notify the Security Office to initiate a PREA investigation as outlined in Section 5 of this procedures manual. (28 C.F.R. §115.63[d])</p> <p>NOTE: The Security Office/PCM/designee shall be responsible for notifying the Shift Commander for any allegations requiring the implementation of checklist procedures as outlined in Section 4 of this procedures manual. (28 C.F.R. §115.52[a])</p> <p>The Facility Manager/designee shall send notification and supporting documentation to the facility PCM within five working days of the receipt of the allegation.</p> <p>Documentation was provided during the pre-audit of emails regarding 2 allegations of sexual abuse the facility received from other facilities in the past 12 months</p>

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 section 4 details the steps to be taken when there is an allegation</p> <p>A. First Responder Duties</p> <p>Upon learning of an allegation that an inmate was sexually abused, the first staff member to respond shall follow the procedures below.</p> <p>1. Security staff shall:</p> <ul style="list-style-type: none"> a. notify the Shift Commander; b. immediately separate the alleged victim and alleged abuser; (28 C.F.R. §115.64[a][1]) c. secure any reported crime scene until appropriate steps can be taken to collect evidence; and (28 C.F.R. §115.64[a][2]) d. if the abuse occurred within the last 96 hours that still allows for the collection of physical evidence, request the alleged victim and ensure that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. (28 C.F.R. §115.64[a][3][4]) <p>2. Non-Security staff shall:</p> <ul style="list-style-type: none"> a. immediately notify the Shift Commander; and (28 C.F.R. §115.64[b]) b. if the first staff responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence. <p>B. Shift Commander Responsibilities Involving Sexual Contact</p> <p>Upon notification of a report of sexual abuse involving sexual contact, the Shift Commander/designated security staff shall initiate the Shift Commander Checklist (Attachment 4-A) and:</p> <ul style="list-style-type: none"> 1. ensure that the alleged victim and alleged abuser are separated. (28 C.F.R. §115.64[a][1]). Determine the least traumatizing placement for the alleged victim, which may be the same or different general population unit; 2. secure any video, audio, or photographic evidence of the incident; 3. notify the Intelligence Gathering Captain, Deputy Superintendent for Internal Security (DSIS), or Security Lieutenant; 4. ensure that the alleged victim is immediately escorted to the Medical Department, if abuse involved physical contact; and 5. ensure completion of the Initial Response Checklist – Alleged Victim (Attachment 4-B), and Initial Response Checklist – Alleged Abuser (Attachment 4-C) as applicable. <p>C. Shift Commander Responsibilities Non-Contact Abuse Allegations</p> <p>Upon notification of a report of sexual abuse not involving sexual contact, the Shift Commander/designated security staff shall initiate the Shift Commander Checklist and:</p> <ul style="list-style-type: none"> 1. ensure that the alleged victim and alleged abuser do not have further direct contact (28 C.F.R. §115.64[a][1]). Determine the least traumatizing placement for the alleged victim, which may be the same or different general population unit; 2. secure any video, audio, or photographic evidence of the incident; 3. notify the Intelligence Gathering Captain, DSIS, or Security Lieutenant; and

4. ensure completion of the Initial Response Checklist – Alleged Victim of Non-Contact Abuse (Attachment 4-D).

There were 17 allegations of sexual abuse in the last 12 months. 1 was reported in the time frame where evidence preservation was needed. There were 6 allegations that a non-security staff member was the first responder.

During the pre audit copies of the checklist and the pocket cards were provided. All staff interviewed were able to explain in detail the actions they would take when an inmate reports a sexual assault.

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	DC-ADM 008 CBS 01 is the local policy for the facility's Coordinated Response to allegations. Staff interviews verified that the policy is followed as well as being able to articulate the steps they would take.

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	There are 8 collective bargaining agreements with unions. None of which limit the facility from separating the abuser and inmate.

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 Section 2 governs protection from retaliation</p> <p>The Department shall 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. (28 C.F.R. §115.67[a])</p> <ol style="list-style-type: none"> 1. Retaliatory action is prohibited against an inmate, staff member, or other individual who reports sexual abuse, sexual harassment, or provides information during an investigation. Any individual, who seeks to deter an inmate or other individual from reporting sexual activity, or who in any manner, harasses or intimidates any person who reports the alleged contact is subject to discipline. (28 C.F.R. §115.67[a]) 2. The Deputy Superintendent for Centralized Services (DSCS) shall meet with any staff that require retaliation monitoring due to report of sexual abuse or sexual harassment, or because of an expressed fear of retaliation due to cooperation with an investigation of inmate sexual abuse or sexual harassment, per PREA Standard (28 C.F.R. §115.67[a][c][e]) and in accordance with Section 3 of this procedures manual. Contact shall be made with the identified staff for at least 90 days and documented on the Department Retaliation Monitoring Form (refer to Section 2, Attachment 2-B). 3. The Department shall employ multiple protection measures, such as housing changes or transfer for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victim. The Department shall also make available emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment, or for cooperating with investigations. (28 C.F.R. §115.67[b]) 4. For at least 90 days following a report of sexual abuse, the Department shall monitor the conduct and treatment of inmates or staff who reported the sexual abuse or sexual harassment, and of inmates who were reported to have suffered sexual abuse or sexual harassment to see if there are changes that may suggest possible retaliation by inmates or staff and shall act promptly to remedy such retaliation. Items the Department shall monitor include: <ol style="list-style-type: none"> a. disciplinary reports; b. housing reports; c. program changes; d. negative performance reviews; and e. reassignments of staff. <p>NOTE: The Department shall continue monitoring beyond 90 days if the initial monitoring</p>

indicates a continuing need. (28 C.F.R. §115.67[b][c])

5. Additionally, if any other individual who cooperates with an investigation expresses fear of retaliation, the Department shall take appropriate measures to protect that individual against retaliation. (28 C.F.R. §115.67[e])

6. Retaliation monitoring shall be documented on the Department Retaliation Monitoring Form (refer to Section 2, Attachment 2-B), and maintained in accordance with Section 1 of this procedures manual. The Department shall continue to monitor for retaliation upon inter-facility transfer. The PCM/designee shall be responsible for forwarding the Department Retaliation Monitoring Form to the receiving facility's PCM/designee for continuation of the monitoring obligation.

7. The Department's obligation to monitor shall terminate if the inmate is released from custody or the investigation is determined to be unfounded. (28 C.F.R. §115.67[f])
PREA compliance Manager is responsible for monitoring for retaliation.

There were 2 allegations that were monitored longer than the 90 days. Three were 2 allegations of retaliation but neither could be substantiated.

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion D.C.-ADM 008 section 2 clearly states that inmates at high risk for sexual abuse or who have been abused shall not be placed in restricted housing/administrative confinement (AC). If the placement should become necessary it will be reviewed every 30 days. There have been no inmates who have suffered sexual abuse placed in restrictive housing/AC during the last 12 months. Interviews support this. There are no restrictions or limitations on program participation, privileges, education, or work assignments because of a sexual abuse allegation.

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 section 5 details administrative and criminal investigation process. DC-ADM 008 complies with all aspects of the standard. Investigations were provided for examination and it was verified that the standard is being followed.</p> <p>The agency refers all investigations that may be criminal to Pennsylvania State police and suspend the internal investigation until PSP have made the determination and given them permission to proceed. It also states that resignation of the staff member does not mean that the investigation stops.</p> <p>There are currently 2 investigations currently waiting on PSP results that are suspended. Where sexual abuse is alleged, the Department shall use investigators who have received specialized training in sexual abuse investigations pursuant to Prison Rape Elimination Act (PREA) Standards</p> <p>The auditor was provided access to training records to verify.</p> <p>The agency has a signed MOU with Pennsylvania State Police (PSP.) This MOU states that PSP will conduct criminal investigations of sexual abuse. The facility is kept informed of the investigative progress through a liaison.</p>

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 section 5 states, "In administrative investigations, the Department shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated" this was verified by examination of sample investigations as well as interviews with staff.</p>

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 Section 8 states:</p> <p>Following the investigation into an inmate’s allegation of sexual abuse in a facility within the Department, the Prison Rape Elimination Act (PREA) Compliance Manager (PCM) at the facility where the inmate is housed shall inform the inmate, in writing within five business days of the closure of the investigation on the PREA Investigation – Inmate Notification Form (Attachment 8-A) as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. (28 C.F.R. §115.73[a])</p> <p>If another agency conducts the investigation, the PCM shall request the relevant information from the investigative agency in order to inform the inmate within ten business days of receipt of this information. (28 C.F.R. §115.73[b])</p> <p>Following an inmate’s allegation that a staff member has committed sexual abuse against the inmate, the PCM shall subsequently inform the inmate when any of the following occurs: (28 C.F.R. §115.73[c])</p> <ul style="list-style-type: none"> a. the staff member is no longer posted within the inmate’s unit; (28 C.F.R. §115.73[c][1]) b. the staff member is no longer employed at the facility; (28 C.F.R. §115.73[c][2]) c. the Department learns that the staff member has been criminally charged related to sexual abuse within the facility; or (28 C.F.R. §115.73[c][3]) d. the Department learns that the staff member has been convicted on a charge related to sexual abuse within the facility. (28 C.F.R. §115.73[c][4]) <p>There are 2 cases currently with the PA State Police. These are waiting for DNA results. The facility’s security office has had recurring contact with PSP regarding this. There have been no investigations completed in the last 12 months.</p> <p>There were 31 investigations completed by the facility in the last 12 months. There were 4 inmates not notified by the facility due to release prior to completion of the investigation. Interviews as well as investigation packets confirm compliance with this standard.</p>

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>In the last 12 months there have been no sanctions taken against staff for violations of agency sexual abuse or sexual harassment policies.</p> <p>Policy 4.1.1 - 1 Section 7 states</p> <p>Inmate Sexual Abuse: In accordance with the Prison Rape Elimination Act of 2003, Standard §115.76 (b), termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.</p> <p>In accordance with the Prison Rape Elimination Act of 1993, Standard §115.76 (c), disciplinary sanctions for violations of agency policies related to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.</p>

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 B. Corrective Action for Contractors and Volunteers</p> <p>Contractors and volunteers are subject to the following:</p> <ol style="list-style-type: none"> 1. when an allegation is made involving a contractor or volunteer, this person shall be removed from contact with the alleged victim until the conclusion of this investigation; 2. if a contractor or volunteer violates this procedures manual, other than by engaging in sexual abuse, the facility shall take appropriate remedial measures and shall consider whether to prohibit further contact with inmates (28 C.F.R. §115.77[b]); and 3. any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with inmates, and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. (28 C.F.R. §115.77[a]) <p>In the past 12 months there have been no incidents involving contractors or volunteers that necessitated being reported to Law enforcement for engaging in sexual abuse.</p> <p>During the past 12 months there have been no contractors or volunteers that have been in violation of the sexual abuse/harassment policies. Reviewed documentation as well as staff interviews support this finding.</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation as well as interviews support that facility is in compliance with this standard. DC-ADM 008 section 7 states:</p> <p>Inmates shall be subject to disciplinary sanctions pursuant to the formal disciplinary process, following an administrative finding that the inmate engaged in inmate on inmate sexual abuse or following a criminal finding of guilt for inmate on inmate sexual abuse. (28 C.F.R. §115.78[a])</p> <p>Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the inmate’s disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. (28 C.F.R. §115.78[b])</p> <p>The disciplinary process shall consider whether an inmate’s mental disabilities or mental illness contributed to his/her behavior when determining what type of sanction, if any, should be imposed. (28 C.F.R. §115.78[c])</p> <p>When an inmate is found guilty of a Class 1 Misconduct related to sexual abuse, the Unit Manager shall refer the inmate to the Sex Offender Treatment Program for evaluation to determine whether or not the inmate is appropriate for the program, and if the inmate will be required to complete the program as part of the sanctions or as a condition to access programming or other benefits. (28 C.F.R. §115.78[d])</p> <p>The facility may discipline an inmate for sexual contact with staff only if it is substantiated that the staff member did not consent to such contact. (28 C.F.R. §115.78[e])</p> <p>For the purpose of disciplinary action, a report of sexual abuse made in good faith, based upon a reasonable belief that the alleged conduct occurred, shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation. (28 C.F.R. §115.78[f])</p> <p>The Department prohibits all sexual activity between inmates and may discipline inmates for such activity. The Department shall not deem such activity to constitute sexual abuse if the Department, through the investigative process, determines that the activity is not coerced or forced. (28 C.F.R. §115.78[g])</p> <p>A reporting inmate can only be subject to disciplinary action for sexual abuse or sexual harassment allegations which have been unfounded and for which the investigation was satisfactorily approved by the Office of Special Investigations and Intelligence (OSII).</p> <p>There has been one administrative finding of inmate on inmate sexual abuse and no criminal findings.</p>

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 section 2 identifies the process for following up with any inmate who reports a prior sexual assault. Any information is strictly limited to those staff necessary to direct treatment plans and security and management decisions. DC-ADM 008 section 2 states: If the screening pursuant to PREA standard indicates that a prison or jail inmate has previously perpetrated sexual abuse whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with the mental health practitioner within 14 days of the intake screening, or sooner if clinically indicated. In addition when information becomes available relating to perpetration for inmate-on-inmate sexual abuse history, a mental health evaluation shall be conducted on these abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate.</p> <p>Medical and Mental health practitioners shall obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in the institutional setting, unless the inmate is under the age of 18.</p> <p>Examples of the form were shared with the auditor as well and interviews conducted show that the facility is in compliance with this standard</p>

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 requires that if no medical or mental health staff are on duty when there is an allegation, that the first responder shall take preliminary steps to protect the victim and contact the facility's designated medical and mental health practitioner. Treatment services shall be provided to the alleged victim without financial cost regardless of whether the alleged victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>Inmates are offered free and timely information and access to emergency contraception and STD treatment. Inmates are sent for SANE exams if the assault is reported within a 96 hour window. DC-ADM 008 provides guidelines for the facility.</p> <p>The auditor was provided documents to show that this policy is followed and the agency complies with the standard.</p>

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 section 4 states that the facility shall offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have allegedly been victimized by sexual abuse in my prison, jail, lockup, or juvenile facility.</p> <p>A review of medical records as well as staff interviews show that inmates who report sexual assault are provided follow-up services. The counseling services are provided by an outside agency and continue until the inmate is no longer in need of the services.</p> <p>DC-ADM 008 states that Alleged inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests.</p> <p>DC-ADM 008 section 2 states that if the screening pursuant to PREA Standard indicated that a prison or jail inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening or sooner, if clinically indicated. In addition, when information becomes available relating to perpetration of inmate-on-inmate sexual abuse history, a mental health evaluation shall be conducted on these abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners.</p> <p>All treatment is provided free of charge to the inmate.</p> <p>Documents were reviewed and interviews conducted to verify compliance with the standard.</p>

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>DC-ADM 008 requires the facility to conduct a review of all instances of sexual abuse. This review is to be conducted within 15 days of the receipt of the notification from OSCII that the investigation was deemed satisfactory.</p> <p>The investigation is considered to be concluded once the Office of Special Investigations and Intelligence (OSII) sends a memo that it has determined that the investigation was satisfactory DC-ADM 008 addresses all requirements of the standard.</p> <p>DC-ADM 008 states that the PREA Compliance Manager (PCM) shall chair the SAIR committee. The PCM, in collaboration with the Facility Manager shall determine the exact composition of the committee based on the nature of the incident. At a minimum, the SAIR committee shall consist of</p> <ul style="list-style-type: none"> Deputy Superintendent for Centralized Services Deputy Superintendent for Facilities Management Licensed Psychology Manager Corrections Health Care Administrator Security Office Representative Major of Unit Management or Major of the Guard <p>The review team shall:</p> <ul style="list-style-type: none"> Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse Assess the adequacy of staffing levels in that area during different shifts Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff Consider information such as housing assignment, measures taken as a result of the allegation, need for follow-up for the inmate victim etc. and within two weeks of the conclusion of the review, the PCM/designee shall prepare a confidential report utilizing the PREA SAIR with any recommendations for improvement. <p>interviews and documentation support that the facility complies with this standard.</p>

115.87	Data collection
	Auditor Overall Determination: Audited at Agency Level
	Auditor Discussion

115.88	Data review for corrective action
	Auditor Overall Determination: Audited at Agency Level
	Auditor Discussion

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Audited at Agency Level
	Auditor Discussion

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>All areas of the institution were visited. There were no areas of the institution that were not visited.</p> <p>All documents requested were provided to the auditor.</p> <p>Interviews with inmates were conducted in a private room. All inmates that were interviewed were chosen by the auditor from a complete list of the facility's inmates.</p> <p>Audit notices were posted in all housing units as well as in the health services area and all work and program areas. Inmates that were asked about when the notices were provided state that the notices have been up for over 6 weeks.</p> <p>2 letters were received by the auditor. inmate letters are not read when being sent out. The inmates asked state that they knew that the letters would not be read by the facility.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Audited at Agency Level
	Auditor Discussion

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 (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.)	na

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

115.13 (a)	Supervision and monitoring	
	Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video	yes

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

	Does the agency ensure that each facility's staffing plan takes into consideration the prevalence of substantiated and unsubstantiated incidents of sexual abuse in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any other relevant factors in calculating adequate staffing levels and determining the need for video monitoring ?	yes

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

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

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

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

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

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

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

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

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

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

115.15 (e)	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	yes

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

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

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

115.17 (a)	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, or to enlist the services of any contractor, who may have contact with inmates?	yes

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

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

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

115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes

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

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

115.21 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	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 entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes

115.21 (h)	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 attempts to make a victim advocate from a rape crisis center available to victims per 115.21(d) above.)	na

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 such publication describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes

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

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

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

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

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

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

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

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

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

115.33 (c)	Inmate education	
	Have all inmates received 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?	yes

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

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

115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes

115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	na
	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.)	na

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.)	na
	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.)	na

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.)	na
	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.)	na
	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.)	na

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.)	na
	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.)	na
	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.)	na

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

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.)	na

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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?	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

115.401 (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