

# PREA Facility Audit Report: Final

**Name of Facility:** SCI-Huntingdon

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 03/14/2017

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Brian Miller	<b>Date of Signature:</b> 03/14/2017

AUDITOR INFORMATION	
<b>Auditor name:</b>	Miller, Brian
<b>Address:</b>	
<b>Email:</b>	brianj.miller@dhs.wisconsin.gov
<b>Telephone number:</b>	
<b>Start Date of On-Site Audit:</b>	01/23/2017
<b>End Date of On-Site Audit:</b>	01/24/2017

FACILITY INFORMATION	
<b>Facility name:</b>	SCI-Huntingdon
<b>Facility physical address:</b>	1100 Pike Street, Huntingdon, Pennsylvania - 16654
<b>Facility Phone</b>	
<b>Facility mailing address:</b>	
<b>The facility is:</b>	<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
<b>Facility Type:</b>	<input checked="" type="radio"/> Prison <input type="radio"/> Jail

Primary Contact			
<b>Name:</b>	Mandy Sipple	<b>Title:</b>	Corrections Classification Program Manager
<b>Email Address:</b>	mbisersipp@pa.gov	<b>Telephone Number:</b>	814-643-2400 [REDACTED]

Warden/Superintendent			
<b>Name:</b>	Kevin Kauffman	<b>Title:</b>	Superintendent
<b>Email Address:</b>	[REDACTED]	<b>Telephone Number:</b>	814-643-2400 [REDACTED]

Facility PREA Compliance Manager			
<b>Name:</b>	Mandy Sipple	<b>Title:</b>	Corrections Classification Program Manager
<b>Email Address:</b>	mbisersipp@pa.gov	<b>Telephone Number:</b>	814-643-2400 [REDACTED]

Facility Health Service Administrator			
<b>Name:</b>	Paula Price	<b>Title:</b>	Corrections Healthcare Administrator
<b>Email Address:</b>	██████████	<b>Telephone Number:</b>	814-643-2400 ██████████

Facility Characteristics		
<b>Designed facility capacity:</b>	1804	
<b>Current population of facility:</b>	2138	
<b>Age Range</b>	Adults: 18-86	Youthful Residents:
<b>Facility security level/inmate custody levels:</b>	2 ,3, 4	
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	659	

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

Agency Chief Executive Officer Information:			
<b>Name:</b>	John Wetzel	<b>Title:</b>	Secretary
<b>Email Address:</b>	██████████	<b>Telephone Number:</b>	██████████

**Agency-Wide PREA Coordinator Information**

<b>Name:</b>	David Radzewicz	<b>Title:</b>	PREA Coordinator
<b>Email Address:</b>	dradzewicz@pa.gov	<b>Telephone Number:</b>	717-728-4135

**AUDIT FINDINGS**

**Narrative:**

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

The Prison Rape Elimination Act audit of SCI-Huntington located at 1100 Pike Street, Huntingdon, PA was conducted by certified auditors Brian Miller (lead auditor) and Maria Silao-Johnson. Both auditors are employees of the State of Wisconsin, Brian with the Department of Health Services and Maria by the Department of Corrections. The audit was conducted as part of a consortium between the states of Pennsylvania, Wisconsin, Maryland and Michigan. Audit notices were sent to SCI-Huntingdon and were posted throughout the institution on December 5, 2016.

A total of five letters were received from inmates at SCI-Huntingdon. One of these letters was received while the audit was taking place and could not be followed on. Another letter was regarding the showers and the lack of privacy in them. The showers were included as part of the audit tour and the staff that were conducting the tour were questioned about the lack of privacy. The auditors were informed that the inmates are required to shower with their boxer shorts on. A third letter was a carbon copy of a letter the inmate had sent to The Abuse Network. The fourth letter was from an inmate that claimed to have been sexually harassed and also sexually assaulted by a guard while being transferred to another state. This incident was alleged to have happened in a county jail during the transport. Included in the letter were copies of two letters the inmates had received from the Jail indicating that the allegations were reviewed and the allegations were found to be unsubstantiated. The second letter from the jail stated the investigation that was conducted is not subject to review or appeal. Due to this investigation having been completed at another facility in another state the inmate was not met with. In the fifth letter received the inmate indicated he made reported sexual harassment and that the allegations were part of an ongoing investigation. Because the matter was under investigation and the proper measures were taking place the inmate was not interviewed. There were no letters received from staff or any other persons associated with SCI-Huntingdon.

This audit was conducted utilizing the PREA Resource Center's Online Audit System. The pre-audit portion of this audit began with the facility completing the pre-audit questionnaire and then submitting it using the OAS. Prior to the on-site audit taking place, lead auditor Brian Miller reviewed the information that was provided by the facility. This included copies of relevant policies, copies of both memos of understanding and letters of understanding with outside agencies, information regarding PREA and the resources available to inmates that is either posted around the facility or given to the inmates. Screenshots of computer databases were included for review. There were some issues that required clarification and these were responded to and answered promptly by the facility. Communication between the lead auditor and the facility continued until the date of the on-site audit. One issue that came about prior the audit was that approximately three weeks before the beginning of the on-site audit Superintendent Eric Tice and PREA Compliance Manager Christian Garman were transferred to SCI-Smithfield and replaced by Superintendent Kevin Kauffman and PREA Compliance Manager Mandy Biser. Fortunately the institutions are located next to each other and the auditors were conducting audits at both facilities and were able to speak with both Superintendents and both PREA Compliance Managers.

The on-site portion of the audit began on Monday morning January 23, 2017 at 8:00am. The day started with a meeting held in the Superintendent's conference room. The Superintendent's office is located at the front of the facility in a structure that was originally designated as the Superintendent's residence. The auditors met with Superintendent Kauffman, PA DOC PREA Coordinator David Radziewicz along with a member of his staff, PREA Compliance Managers Mandy Biser and Christian Garman along with Deputy Superintendents, Majors, Shift Commanders, PREA Lt Maxwell and Administrative Officer Holly Pyle. Introductions were made and the auditors explained the process that would be followed during the audit. We informed the staff from the facility that we would like to begin with a complete site tour and then planned on beginning with interviewing staff followed by interviews with inmates. This included plans to arrive at the facility at 5:00am on Tuesday January 24th. A list of all staff was requested along with shift schedules for all three shifts. A list of all inmates with inmate's names and housing units along with listings of inmates by targeted groups was also provided.

The audit tour began by entering the front of the facility and passing through a metal detector. The auditors were accompanied on the tour by PA DOC PREA Coordinator David Radziewicz along with a member of his staff, PREA Compliance Managers Mandy Biser and Christian Garman, PREA Lt Maxwell and Administrative Officer Holly Pyle. We toured each of the housing cells blocks, the inmate shower areas, the Restrictive Housing Unit, the Behavioral Health Unit, the education area, barber school, medical and mental health areas, the recreation areas including observing the outside recreation facilities, the dining rooms and the kitchen, visiting rooms, maintenance shops, laundry areas, industries buildings including the print shop, the clothing shop and the soap plant. During the tour the auditors ate lunch in the staff dining room and continued the tour. After lunch the tour included the chapel, and also areas outside of the main facility. These included four modular housing units, the warehouse, auto shop and the power plant. The auditors were granted access to all areas that we requested to go to. We requested and were able to spend some time in the CCTV room monitoring cameras and becoming familiar with the capabilities of their video surveillance system. Throughout the tour the auditors were impressed with how clean the facility was. The facility is 130 years old and is still well maintained. We were also impressed by the positive attitude of the staff we interacted with. One area that the lead auditor had been made aware of through an inmate letter, as noted above, was a concern about the showers and the lack of privacy in them. The showers consisted of a long room with a pipe suspended from the ceiling with shower heads alternating coming off one side or the other. Inmates showering would be in close proximity to each other. When questioned about this we were informed that the inmates are required to shower while wearing their boxer shorts so that no one is completely naked while taking a shower. Female staff are not allowed to work in the shower areas and in the lower shower room inmates are required to only use one portion of the showers during normal business hours to prevent female staff members from observing the male inmates in the shower. None of the random inmates that were interviewed felt there was any issue with the showers and stated that they were able to shower without being viewed by staff of the opposite gender.

Staff and inmates were questioned as we walked through the different areas of the facility and asked about their understanding about PREA and whether or not they had been made aware that the audit was going to take place. The positions of cameras, the posting of PREA information and whether or not the PREA audit notice was in place were looked for throughout the tour. The number of cameras in place and their capability/ clarity was impressive. The cameras that were in place in observation cells had been altered to allow the inmates to perform bodily functions without being able to be observed by staff of the opposite gender. The cameras in place throughout the facility also are strategically placed to allow inmates to shower, change clothes and perform bodily functions without being viewed by the camera. There were areas in the warehouse and also in the print shop where the addition of mirrors could be

added to enhance the monitoring capability of the staff working in these areas. We also observed the intermediate and higher level staff that we were touring with were signing into the log designated for documenting supervisory unannounced rounds.

At the conclusion of the tour we were shown to an office that we could utilize to interview staff. The staff interviews on the first day consisted of PA DOC PREA Coordinator David Radzewicz, PREA Compliance Managers Mandy Biser and Christian Garman and PREA Lt/ investigator Maxwell. At the conclusion of the days interviews the plans for the following day were reviewed. This included plans to arrive at 5:00am to interview third shift security staff. The auditors left the facility at 4:00pm.

We arrived back at the facility at 5:00am and were again processed inside. We were escorted to separate offices to conduct interviews. A copy of the third shift roster was obtained and two names were selected by the lead auditor to be interviewed. These interviews were conducted and then names were selected from the first shift roster and also from a list of all staff employed by the facility. Two security staff members from first shift were selected along with staff that work in education, food service and maintenance. The rest of the morning consisted of interviewing both random staff and specialized staff. The specialized staff included intermediate or higher level staff, medical and mental health staff, a religious volunteer, staff who perform screening for risk of victimization or abusiveness, staff who supervise inmates in segregated housing, a staff member who is part of the incident review team, designated staff member that is charged with monitoring retaliation, a staff member who was the first responder to an allegation of sexual abuse and a staff member who works in intake. The remainder of the staff interviews were conducted after lunch including interviewing two security staff members from second shift. Inmate interviews were conducted by reviewing an inmate roster sorted by inmate numbers. Names were selected by randomly flipping through the pages of the roster and selecting inmates so that there was an inmate from each housing unit selected. There were some inmates from the modular housing units that had been selected that were not available to be interviewed due to work assignments outside of the facility. Other names were selected randomly to replace them. We also interviewed inmates who were members of the targeted population. These names were selected by reviewing lists provided by the facility that had identified inmates by targeted groups. These inmates were selected by randomly picking a name from the lists provided. Some of these targeted inmates were also interviewed as random inmates. The auditors were able to conduct the interviews with both staff and inmates in a private setting without facility staff present. One of the inmates did request to meet with a mental health provider following his interview. This service was provided to him. A total of 12 inmates were interviewed representing the 12 housing units at SCI-Huntingdon. The targeted inmates interviewed included an inmate who was limited English proficient and who had difficulty reading. This inmate also reported that he had been sexually abused at another facility. An inmate who identified as bisexual was interviewed as well as an inmate who disclosed during the risk screening that he had been sexually abused as a child. We did not interview any transgender or intersex inmates due to no inmates being housed at SCI-Huntingdon that identified as such. There were no inmates housed in segregated housing due to risk of sexual victimization. SCI-Huntingdon does not house any youthful inmates.

The last interview of the day was with Superintendent Kevin Kauffman in his conference room at the front of the facility. The day concluded with a close out meeting consisting of the staff that were present on the first day of the audit. The staff were thanked for their hospitality and openness and the services that they provided. We asked for and were provided copies of investigations that have been conducted and had decisions made as to the findings. The investigations requested included those whose findings had been substantiated, unsubstantiated and unfounded. Other investigations were reviewed while the copies of the selected investigations were being made. The final interview for this audit was conducted on

Thursday January 26th when an interview was conducted with the Human Resources director at SCI-Smithfield. SCI-Huntingdon and SCI-Smithfield share a Human Recourses department. At the conclusion of the interview we were able to view training records and also reviewed the process that they use when hiring and promoting staff members. This included the procedure for requesting and obtaining background information on the applicants. The database for this information was observed. The training records are kept in a spreadsheet that shows each employees name and the date that the staff member completed the required training. Training acknowledgement forms had been included in the pre-audit documentation along with application materials.

Throughout the interview process the interview guides provided by the PREA Resource Center were utilized.

Following the on-site audit the auditor reviewed all of the documentation that was provided while on-site along with the interview notes. The standards were reviewed and the Online Auditing System's auditor compliance tool was completed. This involved reviewing relevant policies, procedures, investigations, documentation, interview guides/ notes and observations made while on-site. The Pennsylvania Department of Corrections website was visited to review for the required inclusion of policies and information for the public to make a report of sexual abuse or sexual harassment. Contact was also made with the SANE/SAFE nurse providers for their portion of the interview questions. The Abuse Network was contacted to verify that they provide support services to inmates at SCI-Huntingdon that are the victims of sexual abuse.

SCI-Huntingdon was found to be a well run and organized facility. It is apparent from the Superintendent down that the staff take PREA seriously and efforts are made to ensure the sexual safety of the inmates that are incarcerated there. The Pennsylvania Department of Corrections through their comprehensive policy DC-ADM 008, that mirrors the PREA standards, and also the efforts of the administration has firmly established that they are committed to having a zero tolerance for sexual abuse and sexual harassment.

**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.

The State Correctional Institution at Huntingdon is located at 1100 Pike Street, Huntingdon, PA. The facility is located in a residential neighborhood with houses on three sides of the facility. It was created by an act of the General Assembly on June 12, 1878. A group of commissioners appointed for the purpose of selecting a proper site decided on the present location along the Juniata River. The original tract of ground contained 39 acres and several springs. The land for SCI Huntingdon was purchased at a cost of \$22,036. In 1888, R. W. McClaughry was named as the first General Superintendent to direct the new reformatory for delinquents too young for a penitentiary and too old for a juvenile institution. The Industrial Reformatory at Huntingdon received its first inmates in 1889. Two additional cellblocks were added in the 1930s. In 1945, the institution was officially declared the Pennsylvania Institution for Defective Delinquents. Inmates were labeled by the courts as mentally defective with criminal tendencies. In 1960, SCI Huntingdon made its final change to a maximum security, adult male state correctional institution. The facility consists of 12 general housing units along with a Restrictive Housing Unit and a Behavior Health Unit. Four of the housing units are modular units located outside of the main walls of the facility. The inmate population classifications vary from those that are considered maximum security inmates to those housed in the modular housing units that are allowed to work outside of the facility under staff supervision. Inmates in the modular housing units are also able to participate in a dog training program. These inmates are able to have the dogs assigned to them stay with them in their bunk areas.

SCI Huntingdon is Pennsylvania's oldest State Correctional Institution in continuous operation, opening its gates in 1889. Originally intended to reform and educate young male offenders, inmates were schooled in the trades which included, painting, plumbing, carpentry and cabinet making, electrical, masonry (stone and brick) a foundry, blacksmith shop, lime kiln, brick ovens, saw mill, lumber kiln and planing mill. The farm operation supplied meats, dairy, poultry and vegetables for the kitchen. Electricity generated in the power plant and water supplied by springs on the property made the Institution almost totally independent from the outside world. SCI-Huntingdon was built utilizing inmate labor. An example of this is an inmate's initials found etched into one of the bricks at the front of the facility.

Number of Acres Inside the Perimeter: 10

Number of Acres Outside the Perimeter: 300

Number of Operational Structures: 76

Number of Housing Units: 14

Special Features: Special Needs Unit and Modular Housing Units

Inmate Information:

Inmate Population: 2080

Inmate Average Age: 39

Total Number of Full-Time Employees: 650

Academic and Vocational Education:

- Academic Education through GED level
- Vocational Education: Business Education, Auto Mechanics, Barbering, Building Trades, Carpentry,

Printing, and Warehouse/Forklift Operations. The vocational programs can accommodate up to 160 inmates. Industry-recognized certifications are available in all of these programs.

- Apprenticeship Programs: Building Maintenance, Auto Mechanics, Bricklayer, Computer Graphics/Printing, Electrical Maintenance, Air Conditioning/Refrigeration, Upholstery, Cook, Landscape Maintenance Technician, and Baker

#### Inmate Programs:

##### Family/Relationship Self

- Reading to your Children
- Veterans' Support Group

##### Sex Offenders

- Sex Offender Moderate-High Intensity Treatment
- Offender Low Intensity Treatment
- Special Needs Sex Offender Program
- Sex Offender Booster Program

##### Re-Entry

- Pre-Vocational Skills Class
- MoneySmart Program

##### Alcohol and Other Drugs (AOD)

- Living Sober Therapeutic Community
- Parole Violator Group
- Outpatient Therapy Group
- Dual Diagnosis Group
- AA and NA Support Meetings
- Self-Management and Recovery Training

##### Offense Related

- Thinking for a Change
- Act 143 Victim Awareness
- Violence Prevention
- Batterer's Intervention

##### Mental Health Programs

- Dual Diagnosis Group

Visitation: SCI Huntingdon strives to maintain a family friendly visiting room with a relaxed setting. Small games are available to play during visits. Since food items, snacks, and beverages are not permitted to be brought into the institution's visiting room, these items may be purchased from the vending machines located in the visiting area. Inmates are permitted six visits per month.

Correctional Industries: In its modern form, Correctional Industries was introduced at SCI Huntingdon in September of 1954. At the present time, there are three major industrial plants in operation at this facility. There is a Garment/Clothing Plant, a Soap/Detergent Plant, and a Print/Sticker Plant.

Community Work Program: The Community Work Program has performed almost 4,000 hours of community work since January 2013.

#### CWP projects:

- Smithfield Township - general labor
- Bricktown Senior Citizens Center - general labor
- Greenwood State Park - general labor

- Newton Hamilton Borough - general labor
- Huntingdon Community Center - general labor
- Wood Community Association - general labor
- PennDOT Adopt a Highway Program - litter pickup

**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.

<b>Number of standards exceeded:</b>	2
<b>Number of standards met:</b>	37
<b>Number of standards not met:</b>	0
<b>Number of Standards Not Applicable:</b> (The total number of standards that were audited at the agency level)	6

Standards exceeded: 2

115.11 and 115.64

Standards met: 43

115.12, 115.13, 115.14 (Not applicable), 115.15, 115.16, 115.17, 115.18, 115.21, 115.22, 115.31, 115.32, 115.33, 115.34, 115.35, 115.41, 115.42, 115.43, 115.51, 115.52, 115.53, 115.54, 115.61, 115.62, 115.63, 115.65, 115.66, 115.67, 115.68, 115.71, 115.72, 115.73, 115.76, 115.77, 115.78, 115.81, 115.82, 115.83, 115.86, 115.87, 115.88, 115.89, 115.401 and 115.403

Standards not met: 0

SCI-Huntingdon was found to be in compliance with all of the standards in the Prison Rape Elimination Act. They were found to have exceeded two standards: 115.11 for the efforts the PA DOC puts forth in their efforts to provide for zero tolerance of sexual abuse and sexual harassment and also 115.64 for the way that staff respond to alleged incidents of sexual abuse and sexual harassment. All staff are given on a yearly basis a card that spells out their duties as a first responder. The shift commanders have a checklist in place that is a step by step guide for them to follow after becoming aware that there has been an allegation of sexual abuse or sexual harassment.

## Standards

### Auditor Overall Determination Definitions

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

### Auditor Discussion Instructions

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

115.11	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>In making a determination for this standard the auditor reviewed policies and documentation provided by the facility, interviews with the PREA Compliance Manager and observations made by the auditor.</p> <p>115.11 (a) The agency shall have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlining the agency's approach to preventing, detecting, and responding to such conduct.</p> <p>In making a determination into this provision policies provided by SCI Huntingdon's PREA Compliance Manager, the Pennsylvania Department of Corrections mission statement and also other documentation provided both prior to the audit and also during the audit itself were reviewed.</p> <p>Policy DC-ADM 008 Prison Rape Elimination Act section III A outlines the agencies zero tolerance policy. This is also included in DC-ADM 008 Prison rape Elimination Act Procedures Manual section A. The agencies mission statement also directs that the agency enforces a zero tolerance standard to eliminate incidences of sexual abuse, sexual harassment and retaliation.</p> <p>DC-ADM 008 outlines how the PA DOC will implement it's approach to preventing, detecting and responding to sexual abuse and sexual harassment.</p> <p>There is a glossary of terms included in DC-ADM 008 that has the definitions of prohibited behaviors.</p> <p>DC-ADM 008 section 7 lists the sanctions for those found to have engaged in prohibited behavior.</p> <p>Section 2 (A) of DC-ADM 008 lists the PA DOC's prevention efforts. The policy also includes sections on their efforts to reduce and prevent sexual abuse and sexual harassment of inmates.</p> <p>The Agencies zero tolerance policy towards sexual abuse and sexual harassment is also spelled out on the PA DOC website. Information is provided in handout material provided to inmates upon admission to the facility.</p> <p>SCI-Huntingdon PREA Compliance Manager Mandy Biser stated that this Zero Tolerance Policy is put into practice by having staff dedicated to PREA. There is her position, a PREA Lt and an administrative officer who are dedicated to PREA. Unannounced rounds are made on a monthly basis by these staff members to look for any PREA concerns. Every allegation of sexual abuse or sexual harassment is investigated. Staff receive annual update training to stay current with PREA policy and practices. Inmates are screened at intake for safety concerns and inmates are shown the video on PREA and also given detailed information on reporting and safety. PREA posters are posted throughout the facility and also available in the library.</p> <p>115.11 (c) Where an agency operates more than one facility, each facility shall designate a PREA compliance manager with sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards.</p>

For this provision documentation was reviewed that was provided before the audit and interviews with the PREA Compliance Manager.

SCI Huntingdon's organizational chart lists the position of the PREA Compliance Manager and where this position is in the hierarchy of the facility.

Page 2-2 of DC-ADM 008 states that the PREA Compliance Manager will have sufficient time and authority to coordinate the facility's efforts to comply with the standards.

The organizational chart for SCI-Huntingdon shows that the PREA Compliance Manager reports to the Deputy Superintendent Centralized Services. This is also included in the position description for the PREA Compliance Manager.

The PREA Compliance Manager for SCI-Huntingdon is Mandy Biser. She reports to Deputy Superintendent of Centralized Services John Thomas.

During the interview with the Ms. Biser she stated that she feels that she has enough time to manage all of her PREA related responsibilities. She also has an Administrative Officer and a PREA Lieutenant to help with her responsibilities.

The Pennsylvania Department of Corrections efforts to provide for a zero tolerance regarding sexual abuse and sexual harassment if very evident through all of the measures they have implemented towards this goal.

<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Audited at Agency Level
	<b>Auditor Discussion</b>
	Copies of recently completed audits were provided and reviewed that show that this standard was audited at the agency level. SCI Huntingdon is a facility that is operated by the Pennsylvania Department of Corrections and therefore does not contract with other entities for the confinement of it's inmates.

115.13	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing policies and other documentation provided, interviews with staff and observations made during the PREA audit tour on how well staffed the facility was.</p> <p>115.13 (a) The agency shall ensure that each facility it operates shall develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect inmates against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring, facilities shall take into consideration: (1) Generally accepted detention and correctional practices; (2) Any judicial findings of inadequacy; (3) Any findings of inadequacy from Federal investigative agencies; (4) Any findings of inadequacy from internal or external oversight bodies; (5) All components of the facility’s physical plant (including “blind-spots” or areas where staff or inmates may be isolated); (6) The composition of the inmate population; (7) The number and placement of supervisory staff; (8) Institution programs occurring on a particular shift; (9) Any applicable State or local laws, regulations, or standards; (10) The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and (11) Any other relevant factors.</p> <p>Prior to the on-site audit relevant policies were reviewed. Policy DC-ADM 008 section 2 includes the requirement that a staffing plan be in place and also includes the 11 elements of a PREA compliant staffing plan. SCI-Huntingdon has a staffing plan in place and follows this plan. SCI-Huntingdon also utilizes video surveillance to augment their staff.</p> <p>SCI-Huntingdon Superintendent Kevin Kauffman was interviewed. He stated that there is a staffing plan in place. He stated that they look at the number of inmates in the different rooms/ areas and the visibility that the staff have to determine if extra staff should be added. There is video monitoring used as part the staffing plan. The staffing plan is documented and filed daily in the Major's office. There are also electronic copies available.</p> <p>He stated that in assessing adequate staffing levels they do review the 11 areas that are a part of the PREA standards. They have not had to adjust staffing levels based on any judicial findings, from any federal investigation or from findings from any oversight body.</p> <p>He stated that the managers in the different areas have a minimum staffing level and that the supervisors check on these when they are making rounds.</p> <p>PREA Compliance Manager Mandy Biser echoed the answers given by Superintendent Kauffman regarding following the PREA standards in developing and following their staffing plan.</p> <p>During our tour we noted that all areas appeared to be adequately staffed and also there were cameras in place to enhance the staff that were assigned to the areas. We went to the CCTV area to see the coverage that these cameras have. The video capability was impressive. Each cell block had two fixed cameras and one pan/ tilt/ zoom camera on each side of the cell hall.</p> <p>115.13 (b) In circumstances where the staffing plan is not complied with, the facility documents and justifies all deviations from the plan.</p>

SCI-Huntingdon stated that they have not deviated from the staffing plan in the past twelve months.

Overtime reports were reviewed showing vacant posts being covered with overtime.

During his interview Superintendent Kauffman stated that they are never not compliant with their staffing plan. He stated that intermediate level staff make sure that they are compliant. Shift schedules for all three shifts were obtained during our audit. In reviewing those schedules it is apparent that all posts are filled.

During the site tour all areas appeared to be adequately staffed. Shift reports were reviewed and showed that all posts were filled. This includes filling the posts with mandated overtime in order to comply with the staffing plan.

115.13 (c) Whenever necessary, but no less frequently than once each year, for each facility the agency operates, in consultation with the PREA coordinator required by § 115.11, the agency shall assess, determine, and document whether adjustments are needed to: (1) The staffing plan established pursuant to paragraph (a) of this section; (2) The facility's deployment of video monitoring systems and other monitoring technologies; and (3) The resources the facility has available to commit to ensure adherence to the staffing plan.

There is a policy in place requiring the Pennsylvania Department of Corrections to assess, determine and document whether adjustments are needed to: (1) The staffing plan established pursuant to paragraph (a) of this section; (2) The facility's deployment of video monitoring systems and other monitoring technologies; and (3) The resources the facility has available to commit to ensure adherence to the staffing plan.

Pennsylvania Department of Corrections PREA Coordinator David G. Radziewicz was interviewed. He stated that each facility has a triannual staffing analysis done at Central Office. Each facility does this on a yearly basis. Facilities can request interim staffing level adjustments if they feel that the current staffing level is not adequate. An example of this is when a facility develops a diversion unit for it's mental health population. They recognize that these units need an increased staffing level so additional staff are allocated. PREA allegations are one area considered to see if adjustments should be made. There is a PREA tracking system in place that is used for this. Every PREA allegation is entered into this system. If it is felt that adjustments to the staffing levels need to be made after the Incident Review Committee meets, adjustments will be made.

PREA Compliance Manager Mandy Biser stated that the staffing levels were reviewed by the facility in December 2016. This review includes designating gender specific posts, reviewing camera placement and views and conducting tours of the facility to determine if the staffing levels are adequate. Recommendations are made to increase the staffing levels if areas appear to be understaffed and also if additional cameras would enhance the current staffing levels. There have not been any substantiated or unsubstantiated incidents that required a review of the staffing levels.

115.13 (d) Each agency operating a facility shall implement 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. Such policy and practice shall be implemented for night shifts as well as day shifts. Each agency shall have a policy to prohibit 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.

The Pennsylvania Department of Corrections has policies in place that requires intermediate or higher-level facility supervisors to conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Documentation was provided that shows that these rounds are being made at different times throughout the day including the night shift. The rounds cover all areas of the institution. The policy also states that staff shall not inform anyone that these visits are occurring. Any staff member found to be alerting other staff or inmates to these unannounced visits will be subject to disciplinary action.

Two Intermediate or higher level supervisors were interviewed. They both stated that they make rounds on a weekly if not on a daily basis. These rounds are documented on a form that needs to be submitted to the Superintendent on a weekly basis. In order to prevent staff from notifying others of these rounds, the rounds are varied and made unpredictable. They were not aware if there was ever any discipline for staff notifying others of the rounds being made. These supervisors were observed documenting their rounds while on the facility tour. The documentation was reviewed on site and shows that rounds are being made.

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.14 (a) A youthful inmate shall not be placed in a housing unit in which the youthful inmate will have sight, sound, or physical contact with any adult inmate through use of a shared dayroom or other common space, shower area, or sleeping quarters.</p> <p>115.14 (b) In areas outside of housing units, agencies shall either: (1) maintain sight and sound separation between youthful inmates and adult inmates, or (2) provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact.</p> <p>115.14 (c) Agencies shall make its best efforts to avoid placing youthful inmates in isolation to comply with this provision. Absent exigent circumstances, agencies shall not deny youthful inmates daily large-muscle exercise and any legally required special education services to comply with this provision. Youthful inmates shall also have access to other programs and work opportunities to the extent possible.</p> <p>There are no youthful inmates housed at SCI-Huntingdon. This was verified by reviewing inmate population reports and memos provided.. The Pennsylvania Department of Corrections also has a policy in place that complies with this standard. SCI-Huntingdon Superintendent Kauffman also verified that they do not house youthful inmates at this facility.</p>

115.15	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates and observations of practices that were in place during the audit tour.</p> <p>115.15 (a) The facility shall not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners.</p> <p>SCI-Huntingdon has policy 6.3.1 Section 30 page 30-16. It directs that absent exigent circumstances female staff members will search female inmates and male staff members will search male inmates. DC-ADM 008 Section 2 page 2-8 directs that staff shall not conduct cross gender strip searches except in exigent circumstances. It also directs that cavity searches will only be conducted when performed by a physician.</p> <p>Cross gender strip searches and cross gender visual body cavity searches are not conducted at SCI-Huntingdon.</p> <p>There were no cross gender searches observed being conducted while touring the facility. There are gender specific posts at SCI-Huntingdon, these include the Restrictive Housing Unit and the Behavioral Health Unit. Only male staff are assigned to these areas. They are the staff that conduct the strip searches of the inmates in these units. Cameras in areas where strip searches occur were viewed and show that adjustments have been made to them to alter the view to prevent cross gender staff from viewing an inmate that is being searched. These areas were also observed during the audit tour.</p> <p>115.15 (b) As of August 20, 2015, or August 20, 2017 for a facility whose rated capacity does not exceed 50 inmates, the facility shall not permit cross-gender pat-down searches of female inmates, absent exigent circumstances. Facilities shall not restrict female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision.</p> <p>There are no female inmates housed at SCI-Huntingdon.</p> <p>115.15 (c) The facility shall document all cross-gender strip searches and cross-gender visual body cavity searches, and shall document all cross-gender pat-down searches of female inmates.</p> <p>Policy 6.3.1 facility Security Procedures manual section 30 searches page 30-16 states that absent exigent circumstances, a female staff member shall search a female inmate. A male inmate shall search a male inmate. The policy also requires that body cavity searches be conducted by a medical practitioner.</p> <p>Cross-gender strip searches and cross-gender visual body cavity searches are not conducted at SCI-Huntingdon. There have not been any cross-gender strip searches or cross-gender</p>

body cavity searches conducted at SCI-Huntingdon. There are no female inmates housed at SCI-Huntingdon.

115.15 (d) The facility shall implement policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without non-medical 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. Such policies and procedures shall require staff of the opposite gender to announce their presence when entering an inmate housing unit.

Policy DC-ADM 008 section 2 page 2-9 allows for inmates to shower, perform bodily functions and change clothing without non-medical staff of the opposite gender from viewing their breasts, buttocks or genitalia except in exigent circumstances or when such viewing is incidental to routine cell checks. This policy also requires staff of the opposite gender to announce their presence when entering an inmate housing unit.

During random interviews with inmates, the inmates all stated that female staff announce their presence when entering the unit. All but one (non-uniformed) of the random staff members that were interviewed reported that the presence of female staff is announced over the PA system by the block officer when the staff member enters the housing unit. This was a non-security staff member and they were informed of the requirement and also about the notification that is posted outside of the cells blocks requiring this announcement be made. This practice was observed taking place during the tour of SCI-Huntingdon. There is also a sign posted at the entrance to each of the housing units requiring that "all female staff must report to the officer's desk to check in and be announced prior to proceeding through the housing unit".

All of the random inmates stated that they are not ever naked in full view of female staff. The random staff also stated that the inmates are able to dress, shower and perform bodily functions without being viewed by staff of the opposite gender. They said that this is accomplished by female staff not being allowed to work in the shower areas and also by allowing inmates to have a privacy curtain in their cell.

During the tour the inmates cells had privacy curtains in place. There is a line painted on the cell door to inform inmates of the maximum height that the curtain can be hung. This height is high enough to allow the inmate some privacy while changing clothes or performing bodily functions but low enough to allow for staff making rounds to see into the cell while making their rounds.

Inmates were questioned during the tour about using the shower and they echoed the information provided by the random officers that female staff are not allowed in the shower area. It was also revealed that the inmates are required to wear their boxer shorts while showering.

115.15 (e) The facility shall not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, it may be determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner.

SCI-Huntingdon policies DC-ADM 008 Section 9 (page 9-1) and 6.3.1 section 30 (page 30-12) directs that the facility will not search or physically examine a transgender or intersex inmate

for the sole purpose of determining the inmates genital status.

Nine of the 10 random staff interviewed were aware that there was a policy in place prohibiting staff from searching or physically examining a transgender or intersex inmate for the purpose of determining the inmates gender status. There were no transgender inmates interviewed due to the fact that SCI-Huntingdon does not house transgender inmates. If an inmate discloses that they are transgender the inmate is transferred to another facility that has a physical plant allowing for these inmates to shower alone. (This was verified during a subsequent audit conducted at SCI-Smithfield where a transgender inmate who disclosed that they were transgender at SCI-Huntingdon and then transferred to SCI-Smithfield.) The staff member that was not aware of this policy was a non-security staff member and they were informed of the policy.

The training PowerPoint used to train staff was reviewed. Slide 47 provides direction that "Staff shall not search or physically examine a transgender or intersex offender for the sole purpose of determining the offender's genital status."

115.15 (f) The agency shall train security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

SCI-Huntingdon policy 06.03.01 section 30 provides direction in conducting proper searches. The training PowerPoint was reviewed and includes slides directing the staff on how to properly conduct searches of transgender and intersex inmates.

The random staff that were interviewed indicated that they did receive training in conducting cross gender pat down searches and searches of transgender and intersex inmates in a professional and respectful manner. This training occurred within the past calendar year.

115.16	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates and observations of practices that were in place during the audit tour.</p> <p>115.16 (a) The agency shall take appropriate steps to ensure that inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech 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. Such steps shall include, when necessary to ensure effective communication with inmates who are deaf or hard of hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In addition, the agency shall ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities, including inmates who have intellectual disabilities, limited reading skills, or who are blind or have low vision. An agency is not required to take actions that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title II of the Americans With Disabilities Act, 28 CFR 35.164.</p> <p>The Pennsylvania Department of corrections has policies in place to provide for disabled inmates to have 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. This includes inmates that are visual impaired, hearing impaired and also those with other disabilities. There is a contract in place with Language Services Associates to provide sign language services for inmates that are hearing impaired.</p> <p>An inmate was interviewed who claims to have limited reading ability. He stated that he required help reading and understanding his rights to be free from sexual abuse and sexual harassment. He stated that a cell mate helped him with this. he did not request assistance from staff due to him having a distrust of them.</p> <p>PREA information was noted to be placed at a level that inmates with physical limitations would be able to read it easily.</p> <p>115.16 (b) The agency shall 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, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.</p> <p>The Pennsylvania Department of Corrections has both a list of staff that are fluent in languages other than English as well as a contract with an outside provider to provide interpretation services. There are policies in place (DC-ADM008 section 2 pages 2-5 and 2-6) that state that they will take reasonable steps to ensure meaningful access to all aspects of</p>

the Department's efforts to prevent, detect and respond to sexual abuse and sexual harassment to inmates who are limited English proficient.

This effort was noted in the PREA posters being in both English and Spanish. The PREA brochures that are given to the inmates being written in both English and Spanish.

An interview with an inmate that was listed as being limited English proficient found that the inmate felt that he was not provided the information from the facility staff regarding his rights to be free from sexual abuse and sexual harassment. This inmate also stated that he did not trust the Correctional Staff and did not ask for additional help in understanding the material.

115.16 (c) The agency shall not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under § 115.64, or the investigation of the inmate's allegations.

The Pennsylvania Department of Corrections has a policy in place (DC-ADM 008 section 2 page 2-6 ) that prohibits the use of inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under § 115.64, or the investigation of the inmate's allegations.

SCI-Huntingdon stated that they have not used an inmate interpreter in the past 12 months in regards to PREA.

During staff interviews the random staff selected stated that they were not aware of an incident where an inmate interpreter was used. Nine of the ten staff interviewed were aware that there are staff interpreters available. In discussion with the PREA Compliance Manager, Ms. Biser and PREA Lt Maxwell both stated that there is an interpretation service available over the telephone that the investigators would utilize to communicate with an inmate that was limited English proficient. This number is not something that the line staff have access to or would use. This language line was used by my co-auditor while she was interviewing a limited English proficient inmate during the audit we conducted at SCI-Smithfield.

115.17	<b>Hiring and promotion decisions</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1359 450">The determination for this standard was made after reviewing polices and other documentation provided, interviews with staff and observations of how the process of conducting background checks are completed.</p> <p data-bbox="252 495 1477 831">115.17 (a) The agency shall not hire or promote anyone who may have contact with inmates, and shall not enlist the services of any contractor who may have contact with inmates, who— (1) Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997); (2) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.</p> <p data-bbox="252 887 1469 958">The Pennsylvania Department of Corrections has policy number 4.1.1 Section 40 (page 40-2) and section 41 (page41-1) that address this provision.</p> <p data-bbox="252 969 1469 1093">Background checks for both new hire and promotional candidates were reviewed and show that criminal background checks were completed, These checks included questions regarding past conduct.</p> <p data-bbox="252 1104 1469 1350">While interviewing the Human Resources staff a checklist was provided for background check requests. Included in this checklist is a request for "PREA Prior Employer Letter(s)". Also provided was a form for filling position vacancies. This form includes language about prior employment in a prison or jail and also whether the applicant had ever engaged in sexual abuse while employed in a prison, jail, lockup, community confinement facility, juvenile facility or other institution.</p> <p data-bbox="252 1406 1461 1518">115.17 (b) The agency shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.</p> <p data-bbox="252 1574 1461 1776">Attachments 4-A (A letter sent to current/ prior employers of contractors) and 40B ( A letter sent to current/ prior employers of potential hires) asked prior employers if the individual has prior incidents of sexual harassment prior to hiring or promoting anyone or enlisting the services of any contractor. This is also covered in policy 1.1.4 section 4 (page 4-3) and 4.1.1 section 41 (page 41-1).</p> <p data-bbox="252 1787 1469 1910">While interviewing the Human resources staff they said that they have discovered information while conducting background checks where information came to light that stopped them from hiring individuals.</p> <p data-bbox="252 1966 1477 2157">115.17 (c) Before hiring new employees who may have contact with inmates, the agency shall: (1) Perform a criminal background records check; and (2) Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.</p>

The Pennsylvania Department of Corrections policy 4.1.1 section 40 directs that background checks will be requested on all new hires and all rehires.

During the interview with the Human Resources staff they stated that they look at new hire and all rehires past five years of employment. They conduct a PREA background check. This is accomplished by faxing a release form from the prospective employee to the Central Office. Criminal background checks are conducted by the Office of Special Investigation and Intelligence. The Human resource department does the background checks for promotional candidates. When considering contractors the PREA Compliance Manager and the department hiring the contractor conduct the background checks. Background check documentation was reviewed and shows that these checks are being completed.

115.17 (d) The agency shall also perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates.

The Pennsylvania Department of Corrections policy 1.1.4 pages 4-3 and 4-4 addresses this requirement.

When considering contractors the PREA Compliance Manager and the department hiring the contractor conduct the background checks. Background request/ checks were reviewed. Copies of requests for background checks for medical contractors were reviewed and found to be adequate.

115.17 (e) The agency shall either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees.

There is a Human Resources information system in place. The social security number of every employee is checked on a daily basis by a database through the Pennsylvania State Police to check for arrest hits. The institution is notified along with the information available. This is turned over to Security to investigate.

Because of the daily checks being conducted the Pennsylvania Department of Corrections does not complete background checks on employees every five years.

A copy of an arrest report received through this system for a current employee was reviewed.

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

The Human Resources staff state that they do ask all applicants and employees who may have contact with inmates about previous misconduct described in paragraph (a) above. The duty to disclose any such misconduct is part of the code of ethics that they must follow.

115.17 (g) Material omissions regarding such misconduct, or the provision of materially false information, are grounds for termination.

This is addressed on the employment application on the page 8.

Persons applying for a position with the Pennsylvania Department of Corrections must sign an oath stating that they swear and understand that any material omissions regarding such misconduct, or the provision of materially false information is grounds for non-selection or discipline up to and including termination.

A sample of a new application with the applicants signature was reviewed.

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

The Human Resources staff stated that they do provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer. SCI-Huntingdon has responded to such request and has also made such a request. This is also part of their policy.

115.18	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and observations of practices that were in place during the audit tour and also viewing the CCTV room and the capabilities of the cameras that are in place.</p> <p>115.18 (a) When designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency’s ability to protect inmates from sexual abuse.</p> <p>This provision is addressed on page 2-7 of policy DC-ADM 008 section 2. SCI-Huntingdon stated that there have not been any substantial expansion or modifications since the last audit.</p> <p>115.18 (b) When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency’s ability to protect inmates from sexual abuse.</p> <p>Superintendent Kauffman stated that they do and have considered how adding to the monitoring technology including video monitoring will enhance the inmates' protection from sexual abuse.</p> <p>The CCTV room was toured and showed a very sophisticated and clear video monitoring system in place. Camera images were clear with the capability to zoom to the monitor all areas of the cell blocks and other areas of the facility. For a facility that is 130 years old the video monitoring technology was impressive.</p> <p>SCI-Huntingdon updated their video recording technology in 2016. Meeting minutes referencing the monitoring technology was reviewed.</p> <p>As discussed at the close out meeting, the addition of mirrors in the warehouse and in the industries areas could be beneficial in enhancing the inmates protection from sexual abuse. These areas are well staffed but the mirrors would be an inexpensive measure to enhance monitoring.</p>

115.21	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates, an interview with the SANE/SAFE staff at Geisinger Lewiston Hospital, a phone conversation with a staff member from The Abuse Network and observations of practices that were in place during the audit tour.</p> <p>115.21 (a) To the extent the agency is responsible for investigating allegations of sexual abuse, the agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.</p> <p>The Pennsylvania Department of Corrections policy DC-ADM 008 section 5 outlines the facilities responsibilities for conducting administrative sexual abuse investigations. The PA DOC has a MOU in place with the Pennsylvania State Police to conduct criminal sexual abuse investigations. The PA DOC policy DC-ADM 008 section 5 directs that a uniform evidence protocol be followed.</p> <p>During interviews with random staff all of them expressed the importance of preserving evidence. The staff at SCI-Huntingdon are provided with a PREA first responder card that directs them in the steps they need to take when they become aware of an incident of sexual abuse. The staff referred to these cards while answering questions. Four of the staff included information about not allowing the inmate to shower, brush his teeth or change clothes in order to preserve evidence. All of the random staff interviewed were able to state that the PREA Lt and the PREA Compliance Manager were responsible for conducting sexual abuse allegations. One staff member included the Pennsylvania State Police as part of the investigation process.</p> <p>In reviewing policies there is a protocol in place that directs responders in obtaining usable physical evidence.</p> <p>115.21 (b) The protocol shall be developmentally appropriate for youth where applicable, and, as appropriate, shall be adapted from or otherwise based on the most recent edition of the U.S. Department of Justice’s Office on Violence Against Women publication, “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” or similarly comprehensive and authoritative protocols developed after 2011.</p> <p>There are no youthful inmates housed at SCI-Huntingdon.</p> <p>115.21 (c) The agency shall offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The agency shall document its efforts to provide SAFEs or SANEs.</p>

Page 4-3 of Pennsylvania Department of Corrections policy DC-ADM 008 section 4 outlines the procedure for forensic medical examines to take place.

Page 4-2 of this policy states that the treatment will be provided at no cost to the victim. These examines will be conducted by SANE nurses. There is a MOU with Geisinger-Lewistown Hospital to provide the SANE examines. There is also a list provided of all the hospitals that have SANE nurses available.

A letter was attached indicating that no inmates have had to be sent for treatment by a SANE nurse. Forensic exams do not take place at the facility.

The SANE nurse supervisor at Geisinger Lewistown Hospital was interviewed. She stated that they conduct the forensic medical examines of the inmates brought to the hospital. She also stated that they always have a SANE/ SAFE nurse on call. In the event that they cannot provide the services within the 96 hour timeframe they would have the inmate sent to another hospital that was able to conduct the exam within that timeframe.

Memorandum of Understanding between SCI-Huntingdon and Geisinger Lewistown Hospital was reviewed and provides for inmates to receive forensic medical exams.

115.21 (d) The agency shall attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the agency makes available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member. Agencies shall document efforts to secure services from rape crisis centers. For the purpose of this standard, a rape crisis center refers to an entity that provides intervention and related assistance, such as the services specified in 42 U.S.C. 14043g(b)(2)(C), to victims of sexual assault of all ages. The agency may utilize a rape crisis center that is part of a governmental unit as long as the center is not part of the criminal justice system (such as a law enforcement agency) and offers a comparable level of confidentiality as a nongovernmental entity that provides similar victim services.

SCI-Huntingdon has an MOU with The Abuse Network to provide a victim advocate for the victim of sexual abuse. There is a form that is completed when these services are offered to the inmate. There are also emails reviewed indicating that the staff from The Abuse Network saw victims or were planning on meeting with victims.

During the interview with PREA Compliance Manager Mandy Biser she stated that The Abuse Network provides victim advocate services for inmates that are victims of sexual abuse. They will email the advocate directly and arrange for her to come in and meet with the inmate.

Follow ups are done over the phone.

There is memorandum of understanding between SCI-Huntingdon and The Abuse Network for them to provide victim advocate services for the inmates.

The Abuse Network was contacted and they verified that they provide services to inmates that are victims of sexual abuse while at SCI-Huntingdon.

An inmate who reported that he was sexually abused stated that he was allowed to call the abuse hotline and that the hotline staff helped with emotional support. This support person is still available if he needs it.

115.21 (e) As requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member shall accompany and support the victim

through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals.

Pennsylvania Department of Corrections policy DC-ADM 008 section 4 page 4-7 provides for the opportunity for the inmate to have a victim advocate meet the inmate at the hospital and be present during the exam and investigatory interview. They will provide emotional support, crisis intervention, information and referrals. There is a pamphlet given to inmates from The Abuse Network that describes the services provided to the inmates and also how to contact them. There is also a letter that is given to victims of sexual abuse that notifies them of their right to an outside advocate and also that they understand their rights and that they either wish to accept these services or that they chose not to use them.

Mandy Biser, PREA Compliance Manager stated that the claim has to be substantiated or unsubstantiated in order for an inmate to be provided with victim advocate services. They ensure that they maintain the privacy of the inmate when providing these services.

The inmate who reported that he was sexually abused that he was able to speak to an abuse hotline and that the hotline staff helped with emotional support. This support person is still available if he needs it.

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

The PA DOC has requested that the Pennsylvania State Police follow the requirements of §115.21 (a) through (e) of the standards. This information is included in an agreement signed by the Pennsylvania State Police

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

Staff from The Abuse Network provide this service to inmates

115.22	<b>Policies to ensure referrals of allegations for investigations</b>
	<p data-bbox="252 168 901 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 246 523 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 1396 448">The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and accessing the Pennsylvania Department of Corrections website for verification of information provided by the facility.</p> <p data-bbox="252 492 1348 571">115.22 (a) The agency shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.</p> <p data-bbox="252 616 1460 784">Pennsylvania Department of Corrections policy DC-ADM 008 section 5 page5-1 directs that every report , complaint or allegation of sexual abuse and sexual harassment, including third party and anonymous reports shall be investigated promptly. There is a tracking system that keeps track of the investigations.</p> <p data-bbox="252 795 1476 996">Investigations were reviewed including one that was substantiated for sexual abuse, two that were unsubstantiated and one that was unfounded. These investigations were found to be thorough, well documented and complete. The allegation that was substantiated was first investigated as a case of sexual abuse but through the investigative process the sexual abuse could not be substantiated but sexual harassment was able to be found to have occurred.</p> <p data-bbox="252 1052 1460 1254">115.22 (b) The agency shall have in place a policy to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The agency publishes such policy on its website or, if it does not have one, makes the policy available through other means. The agency documents all such referrals.</p> <p data-bbox="252 1310 1460 1377">There is an MOU with Pennsylvania State Police to conduct criminal investigations. DC-ADM 008 section 5 page 5-1 addresses this. This information is on the agency's website.</p> <p data-bbox="252 1388 1141 1422">Documentation was provided for referrals for criminal investigations.</p> <p data-bbox="252 1433 1476 1680">PREA investigator, Lt Maxwell was interviewed. He stated that all sexual abuse allegations are investigated and referred to law enforcement.. The facility continues their internal investigation. There is a link on the Pennsylvania Department of Corrections website to their policy DC-ADM 008 Prison Rape Elimination act. Section 5 of this policy includes information on the referral of allegations of sexual abuse and/ or sexual harassment to the Pennsylvania State Police.</p> <p data-bbox="252 1691 1476 1769">Also reviewed were correspondence between SCI-Huntingdon and the PSP. This is a checklist that is completed by the shift commander when investigations are referred to the State Police.</p> <p data-bbox="252 1825 1444 1904">115.22 (c) If a separate entity is responsible for conducting criminal investigations, such publication shall describe the responsibilities of both the agency and the investigating entity.</p> <p data-bbox="252 1948 1460 2072">Page 5-1 of section 5 of DC-ADM 008 found on the Pennsylvania Department of Corrections website describes the investigative responsibilities of both the PA DOC and the PA State Police.</p>



115.31	<b>Employee training</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and also reviewing the training documentation that is kept for the staff.</p> <p>115.31 (a) The agency shall train all employees who may have contact with inmates on: (1) Its zero-tolerance policy for sexual abuse and sexual harassment; (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; (3) Inmates' rights to be free from sexual abuse and sexual harassment; (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; (5) The dynamics of sexual abuse and sexual harassment in confinement; (6) The common reactions of sexual abuse and sexual harassment victims; (7) How to detect and respond to signs of threatened and actual sexual abuse; (8) How to avoid inappropriate relationships with inmates; (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.</p> <p>The Pennsylvania Department of Corrections policy DC-ADM 008 section 2 page 2-1 is the agency's zero tolerance policy. Page 2-14 of the policy directs that staff will be trained in the zero tolerance policy. Also included is the requirement that all of the provisions included in this section are areas that staff will be trained in. The training lesson plans provided include all of these provisions.</p> <p>Random staff interviewed acknowledged that they have received training in all ten areas covered by this provision. Training records were reviewed and showed that this training was conducted in 2016 and all staff were trained.</p> <p>During the tour staff were asked about the zero tolerance policy and they were able to acknowledge that they were aware of this and that they had received training regarding it.</p> <p>115.31 (b) 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 female inmates, or vice versa.</p> <p>Page 2-15 of DC-ADM 008 section 2 states that the training received shall be tailored to the gender of the inmates at the facility. This includes employees who are reassigned from facilities housing the opposite gender are given additional training.</p> <p>The training provided focuses on male inmates but also includes information related to searching female inmates.</p> <p>115.31 (c) All current employees who have not received such training shall be trained within one year of the effective date of the PREA standards, and the agency shall 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. In years in which an employee does not receive refresher training, the agency shall provide refresher</p>	

information on current sexual abuse and sexual harassment policies.

Page 2-15 of DC-ADM 008 section 2 list the training schedule beginning in 2016 and going on from there in alternating years the manner in which this training will be conducted as either update or refresher training.

Random staff interviewed stated that they received training in 2016.

The training records reviewed show that all of the staff received training in 2016.

115.31 (d) The agency shall document, through employee signature or electronic verification, that employees understand the training they have received.

Pennsylvania Department of Corrections policy DC-ADM 008 section 2 page 2-15 includes information requiring employees who may have contact with inmates sign a verification form that they understand the training they have received. Copies of completed verification forms were reviewed.

Staff sign a verification form that they received the training and also that they understand the training. Copies of these verification forms were reviewed.

115.32	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with a contractor/ volunteer who works at the facility and a review of training documentation.</p> <p>115.32 (a) The agency shall ensure 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.</p> <p>Volunteer and contractor training was reviewed. The training includes their responsibility under the Pennsylvania Department of Corrections sexual abuse and sexual harassment prevention, detection and response policies and procedures. Training verification forms from volunteers/ contractors were reviewed.</p> <p>DC-ADM 008 section 2 pages 2-16 and 2-17 includes the requirement for this training. A volunteer/ contractor that was interviewed stated that he has received both initial training and also refresher training in December 2016 about his responsibilities regarding sexual abuse and sexual harassment prevention, detection and response.</p> <p>Training records were reviewed along with verification forms signed by the volunteers/ contractors showing that this training is taking place.</p> <p>115.32 (b) 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, but all volunteers and contractors who have contact with inmates shall be notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.</p> <p>Pennsylvania Department of Corrections policy DC-ADM 008 section 2 page 2-16 allows that the training volunteers and contractors receive is based on the level of contact that they have with inmates.</p> <p>The training provided includes the agency's zero tolerance policy regarding sexual abuse and sexual harassment and how to report such incidents. Verification forms of this were reviewed. The religious volunteer that was interviewed stated that the training consisted of what they need to know regarding sexual abuse and sexual abuse prevention, detection and response. This included contacting the shift commander if he becomes aware of an incident of sexual abuse or sexual harassment. It also included separating the individuals involved and taking steps not to destroy evidence including instructing the inmate not to brush their teeth or take a shower.</p> <p>He also stated that he was trained in the PA DOC zero tolerance policy on sexual abuse and sexual harassment. He stated that he has also seen this during the orientation with the inmates when they watch the video.</p> <p>The training records and verification forms signed by the volunteers/ contractors were reviewed. They show that this information is provided and that they understand the information that was provided.</p>

115.32 (c) The agency shall maintain documentation confirming that volunteers and contractors understand the training they have received

Verification forms signed by the volunteers and contractors were provided and reviewed.

<b>115.33</b>	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies, copies of the PREA posters, the PREA brochures that inmates are given, inmate handbooks, and also handouts inmates receive, interviews with staff and inmates and observations of practices and documentation that was in place during the audit tour.</p> <p>115.33 (a) During the intake process, inmates shall receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.</p> <p>Page 2-18 of DC-ADM 008 section 2 requires that inmates receive information about the zero tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. Information is also included in a handout, PREA posters and pamphlets. Policy 11.2.1, Reception and Classification Procedures Manual Section 1 – Reception includes the requirement that the inmates receive and review the PREA brochure. Inmate verification forms were provided documenting that they have received this education.</p> <p>A staff member that works in intake was interviewed regarding information provided to inmates. He stated that the inmates are given a pamphlet when they arrive that gives information about the zero tolerance policy and also how to report incidents or suspicions of sexual abuse and sexual harassment. This includes an address on the back to make reports to, and also other methods to make a report including telling a staff member and making a written report to any staff member or going to an online tip line to make a report. This pamphlet and information are given during inmate orientation and also at the inmates annual review.</p> <p>All but one of the inmates interviewed stated that they did receive information about SCI-Huntingdon's rules against sexual abuse and sexual harassment. The one inmate who was not sure had been at the institution for over 15 years. He was able to say that the information is by the phones and that this information has been around for a while.</p> <p>115.33 (b) Within 30 days of intake, the agency shall provide comprehensive education to inmates either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents.</p> <p>The PREA Resource Center's Inmate Education Facilitator Guide "PREA What you Need to Know" was provided as a guide that staff follow when providing orientation to the inmates. The video "PREA: What You Need to Know" is shown during inmate orientation. The video is also played every Monday on the institution television channel.</p> <p>The intake staff member interviewed stated that they ensure the inmates are educated regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents along with the Pennsylvania Department of Corrections policies and procedures for responding to these incidents is accomplished through the use of posters that are in place throughout the institution. The inmates also receive this information</p>

when they meet with the initial reception committee, at the inmate orientation and also during their annual review.

The random inmates interviewed all stated that they were told their right to be free from sexual abuse and sexual harassment, how to report sexual abuse and sexual harassment, their right not to be punished for reporting sexual abuse and sexual harassment. Inmates that were received at SCI-Huntingdon recently stated that they received the information either the day they arrived or the next day. Inmates that have been here longer stated that they also received the information.

Intake records reviewed show that the inmates received comprehensive PREA education with in their first week at SCI-Huntingdon. There were inmate verification forms reviewed that show the inmates have received this education within their first week at SCI-Huntingdon and understand it. This information is also available to the inmates in the PREA brochure, inmate handbook and a post card given to inmates regarding sexual assault in prison.

115.33 (c) Current inmates who have not received such education shall be educated within one year of the effective date of the PREA standards, and shall 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.

Documentation was provided showing that inmates have been educated. This is also addressed in DC-ADM 008 section 2 page 2-18.

This policy on page 2-19 addresses the education of inmates transferred from one facility to another.

The intake staff member interviewed stated that they ensure that current inmates as well as those transferred from other facilities receive this education through inmate orientation as well as receiving it at their annual reviews.

Three of the random inmates have been at SCI-Huntingdon for over five years. These inmates all stated that they had received the comprehensive PREA education.

This was also verified by reviewing computer records of inmates receiving the PREA education and also by reviewing the inmate verification forms.

115.33 (d) The agency shall provide inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, otherwise disabled, as well as to inmates who have limited reading skills.

PREA handouts are in both English and Spanish as well as the PREA posters.

Policy DC-ADM 006 section 3 requires that accommodations be made for inmates that are both hearing and visually impaired or disabled. PREA information is provided in Braille.

Policy DC-ADM 008 section 2 page 2-18 includes the requirement that the inmate education be provided in formats accessible to all inmates.

Education material was reviewed including a letter stating that the PREA information had been translated into Braille and was available to any facility that had a need for it. The PREA poster as well as the PREA brochure given to inmates is provided in both English and Spanish. There is a postcard that is given to inmates that provides information about prison sexual assault and what to do if they are assaulted is also provided in both English and Spanish. There is also

information provided to staff about interpretation services available for both those inmates that are Limited English Proficient and also those that are hearing impaired. This information is available on the PA DOC intranet site. The information includes a listing of staff that are fluent in languages other than English and also a link to the translation services available to the PA DOC. This language line was utilized while interviewing an inmate who was Limited English Proficient at while conducting a PREA audit at SCI-Smithfield (These two facilities are located adjacent to each other and the audits were conducted on consecutive days). Each facility is given a unique access code to enter when utilizing this system.

115.33 (e) The agency shall maintain documentation of inmate participation in these education sessions

Inmate verification forms and also computer lists of inmates that have received this education was reviewed. This showed that the inmates have received the education. The inmates spoken with also verified that they have received this education.

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

PREA posters are available along with the PREA handout. The PREA video is shown once a week on the facility TV channel. The information is included in the inmate handbook. During the tour of SCI-Huntingdon PREA posters were found to be posted in all areas of the institution, including the visiting room and shop areas. This information is also provided in the inmate handbook and also brochures given to inmates. The facility television channel that the PREA educational video was played on was also demonstrated. Inmates that were interviewed and those spoken to during the audit tour were aware of the zero tolerance policy and also of the different methods available to make a report of sexual abuse and sexual harassment.

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates and reviewing the training records of the investigators.</p> <p>115.34 (a) In addition to the general training provided to all employees pursuant to § 115.31, the agency shall ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings.</p> <p>Pennsylvania Department of Corrections policy DC-ADM 008 section 2 page 2-15 includes the requirement that investigators are trained in conducting sexual abuse investigations in confinement settings. Copies of the training modules for investigators was reviewed. The PREA investigator, Lt Maxwell, stated that he has received training specific to sexual abuse investigation in a confinement facility. The training included conducting interviews, evidence collection, complete investigations, Miranda &amp; Garrity warnings. The training that the investigators received consisted of five modules. The training transcripts for the investigators was reviewed and verified.</p> <p>115.34 (b) Specialized training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.</p> <p>Lt Maxwell indicated that the training he received included interviewing techniques geared toward sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The training modules include this information and the training transcripts show that this was received by the PREA investigators.</p> <p>115.34 (c) The agency shall maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. Training transcripts were reviewed and found to be compliant.</p>

115.35	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and reviewing training documentation.</p> <p>115.35 (a) The agency ensures that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: (1) How to detect and assess signs of sexual abuse and sexual harassment; (2) How to preserve physical evidence of sexual abuse; (3) How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and (4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.</p> <p>Policy DC-ADM 008 section 2 page 2-16 provides that medical and metal health practitioners who work in the facility receive training in working with victims of sexual abuse and sexual harassment. A copy of this training was reviewed.</p> <p>A participant guide was reviewed. This is a fill in the blank form that the participants fill out during training. Training verification forms were reviewed.</p> <p>Staff from both Medical and Mental health specialties were interviewed. The Mental Health staff member stated that they received the training in person and also received update training on the computer. The training included the elements required by the standard. The Medical staff member stated that they received the required training and has also participated in several video conference webinars. They also stated that the information is available in a manual kept in the medical offices for the staff to refer to.</p> <p>Training material was reviewed and was found to be in compliance with the standard. Staff training records were reviewed and show that this training was received. Verification forms signed by the staff also show that the staff received the training and also that they understand the training that they received.</p> <p>Policy DC-ADM 008 section 2 page 2-16 contains all of the required elements addressed by this provision.</p> <p>115.35 (b) If medical staff employed by the agency conduct forensic examinations, such medical staff shall receive the appropriate training to conduct such examinations.</p> <p>The staff at SCI-Huntingdon do not conduct forensic medical exams. Medical forensic exams are conducted at Geisinger-Lewistown Hospital.</p> <p>115.35 (c) The agency shall maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere.</p> <p>Training records are maintained for staff receiving the Medical and Mental Health staff's PREA related specialized training. This documentation was reviewed.</p> <p>115.35 (d) Medical and mental health care practitioners shall also receive the training</p>

mandated for employees under § 115.31 or for contractors and volunteers under § 115.32, depending upon the practitioner's status at the agency.

Training records were reviewed and include the training mandated for all employees under § 115.31 or for contractors and volunteers under § 115.32, depending upon the practitioner's status at the agency.

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<p data-bbox="248 168 898 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="248 248 523 284"><b>Auditor Discussion</b></p> <p data-bbox="248 329 1393 448">The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates and observations of practices that were in place during the audit tour.</p> <p data-bbox="248 499 1422 618">115.41 (a) All inmates shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates.</p> <p data-bbox="248 669 1453 831">Page 2-10 of policy DC-ADM 008 section 2 outlines the Pennsylvania Department of Corrections requirement that inmates be screened for risk of sexual abuse victimization or sexual abusiveness towards others upon admission to a facility or transfer to another facility. The screening tool was also included and reviewed.</p> <p data-bbox="248 840 1426 958">A staff member that is responsible for conducting risk screening was interviewed he stated that they do conduct screenings for inmates admitted to SCI-Huntingdon for risk of sexual abuse victimization or sexual abusiveness toward other inmates.</p> <p data-bbox="248 967 1437 1086">Of the random inmates only four of them have been at the institution for less than a year. These four stated that they were asked the screening questions and they were asked them when they first arrived.</p> <p data-bbox="248 1095 1469 1431">While in the intake area staff stated that when the inmates first arrive they are met with and one staff member there will conduct the screening using the PREA Risk Assessment Tool (PRAT). Inmates that are determined to be at risk of abusiveness or risk of victimization through the PRAT are entered into a database as having a housing concern. This is to limit the access to the information received during the PRAT. How they score is limited to staff with a need to know. Another database lists inmates with a housing concern. Because this database does not identify an inmate as ROV or ROA inmates with housing concerns are not housed together.</p> <p data-bbox="248 1440 1469 1559">Copies of lists of inmates received were reviewed. Included with this was the inmates score that they received from the PRAT screening. This score includes both the score they received for risk of abusiveness and the score they received for the risk of victimization.</p> <p data-bbox="248 1612 1458 1648">115.41 (b) Intake screening shall ordinarily take place within 72 hours of arrival at the facility.</p> <p data-bbox="248 1700 1437 1776">DC-ADM 008 section 2 page 2-11 requires that the inmates be screened within 72 hours of reception to the department and transfer to another facility.</p> <p data-bbox="248 1785 1437 1904">The staff member that is responsible for conducting risk screening stated that ordinarily the screenings take place on the same day as the inmates arrive occasionally it will be longer if they arrive on a Friday or Holiday Monday.</p> <p data-bbox="248 1912 1474 1989">The random inmates that were interviewed and that had arrived within the past twelve months stated that they were asked the screening questions when they first arrived.</p> <p data-bbox="248 1998 1445 2157">Records were reviewed for 19 inmates that had transferred in to SCI-Huntingdon. These records showed that the screenings took place the same day that the inmate arrived at SCI-Huntingdon. There were four inmates that arrived on Friday, November 18, the day after Thanksgiving. The screenings for these inmates was conducted between 4 and 5 days after</p>

their arrival. While this is over 72 hours inmates are ordinarily screened within 72 hours.

115.41 (c) Such assessments shall be conducted using an objective screening instrument.

The PREA Risk Assessment Tool (PRAT) was reviewed and it incorporates all 10 areas listed in this standard. Scores are given based on both inmates answers to questions and staff observations. The inmates answers for each question are used to score them as being at risk of being a victim or at risk of being an abuser. The total score is used to determine the inmate's risk rating.

115.41 (d) The intake screening shall 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; (2) The age of the inmate; (3) The physical build of the inmate; (4) Whether the inmate has previously been incarcerated; (5) Whether the inmate's criminal history is exclusively nonviolent; (6) Whether the inmate has prior convictions for sex offenses against an adult or child; (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; (8) Whether the inmate has previously experienced sexual victimization; (9) The inmate's own perception of vulnerability; and (10) Whether the inmate is detained solely for civil immigration purposes.

The PRAT has yes or no questions and these answers are entered into a system and based on a scale. If the inmate scores 24 and above they are determined to be at risk of being an abuser, if it is 16 and above they are determined to be a risk for victimization. A housing concern is entered for these inmates.

All ten items in the standards are included in the PREA Risk Screening Tool used by the PA DOC.

115.41 (e) The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing inmates for risk of being sexually abusive.

The staff member that is responsible for conducting risk screening stated that they ask the inmate about prior victimization or if they were a victimizer in both the community and in prison, if they have a history of victimization, if they consider themselves as having a disability. They look at their body stature, their presentation and if they appear vulnerable.

115.41 (f) Within a set time period, not to exceed 30 days from the inmate's arrival at the facility, the facility will reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening.

Policy DC-ADM 008 section 2 pages 2-11 and 2-12 directs that a reassessment shall be conducted between 20 and 30 days of every inmate's arrival in the system or receipt into another facility. It also directs that every inmate shall be reassessed at the annual review conducted by his/ her counselor.

The staff member that is responsible for conducting risk screening stated that inmates risk levels are reassessed 20 to 30 days after they arrive. They are also assessed after 6 months and then yearly.

Three of the random inmates were able to remember having been asked the screening type

questions a second time after they had been at the institution for a period of time. One of the inmates stated that he was asked these questions at his annual review.

Documentation was reviewed that showed 7 inmates who received an initial screening and a follow up screening between 20 and 30 days after their initial screening. This information was found in a tracking system database that ensures that inmates are reassessed between 20 and 30 days after the initial assessment.

115.41 (g) An inmate's risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness.

The staff member that is responsible for conducting risk screening, who was a psychology department staff member, stated that the psychology department will reassess an inmates risk level based on a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness.

Three of the random inmates were able to remember having been asked the screening type questions a second time after they had been at the institution for a period of time.

One of the inmates stated that he was asked these questions at his annual review.

A copy of a Sexual Abuse/ Harassment Coversheet was reviewed that showed an inmate making an allegation of sexual harassment. Documentation was provided showing that this inmate was reassessed two days after he made the allegations. Another inmate was reassessed the same day as he made an allegation of sexual harassment. Two other examples were provided that show that inmates who claimed that they were sexually harassed were reassessed the day after the allegations were received.

115.41 (h) Inmates may not be 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.

Page 2-12 of policy DC-ADM 008 section 2 prohibits inmates from being disciplined for refusing to answer questions, or for not disclosing complete information in response to the questions regarding prior victimization, disabilities, their perception of vulnerability, or their sexual orientation.

The PREA Risk Assessment Tool also includes language that the inmate can share as much or as little information as they feel comfortable sharing.

The staff member that is responsible for conducting risk screening stated that inmates are not subject to discipline for refusing to answer questions on the PRAT.

This is also stated in policy.

115.41 (i) The agency shall implement 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.

Pennsylvania Department of Corrections PREA Coordinator David Radziewicz stated that anyone who administers the screening tool has access to it. Others wishing to have access has to request this through the PREA Compliance Manager. Nurses, Counselors and

Psychology staff would access to the information. The score an inmate receives on his PRAT is used for housing assignments. the unit management system can be checked for risk of victimization or risk of abusiveness. Just the end results are available for security staff to use for housing decisions.

SCI-Huntingdon PREA Compliance Manager Mandy Biser Stated that the information received from the PRAT is limited to certain staff. The screeners and the PCM can see any inmates PRAT.

The staff member that is responsible for conducting risk screening stated he believes that it is outlined on who has access to an inmates risk assessment. He said that once the information is entered he can't go back in and look at the assessment. The paper assessment form is shredded once the information is entered into the computer.

DC-ADM 008 section 2 page 2-10 directs that the sensitive information collected through these tools shall be kept as confidential as possible so as not to be used to the inmate's detriment by staff or other inmates.

<b>115.42</b>	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates and observations of practices that were in place during the audit tour.</p> <p>115.42 (a) The agency shall use information from the risk screening required by § 115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p>Page 2-10 of DC-ADM 008 section 2 outlines the use from the risk screening to inform housing, bed placement, work, education, and program assignments with the goal of keeping separate those inmates at high risk for being sexually victimized from those at high risk of being sexually abusive.</p> <p>A screen shot of how the information from the risk screening will be incorporated in making housing decisions was included and reviewed. Also included and reviewed was a list of inmates listed as potential victims and potential sexual predators.</p> <p>SCI-Huntingdon PREA Compliance Manager Mandy Biser stated that the PREA Risk Assessment Tool is used to make housing concerns. It's used to make sure that two inmates aren't housed together if they are at risk for victimization or at risk of abusiveness. The computer lists inmates as having a housing concern. Inmates with housing concerns are not celled together. Staff looking at the computer (DOCNET) do not know what the concerns are. The unit manager can see the reason for the concerns. The counselors reassess within 30 days.</p> <p>The staff member who performs screening for risk of victimization and abusiveness stated that they use the information from the screening to make housing concerns known. The unit manager is notified.</p> <p>Samples of inmates that have been screened as potential victims and also those that were screened as being potential abusers were provided. This information is on inmate management system accessible database and shows that the inmates are listed as potential victims or as institutional sexual predators.</p> <p>115.42 (b) The agency shall make individualized determinations about how to ensure the safety of each inmate.</p> <p>Page 2-13 of DC-ADM 008 section 2 notes that the agency/ facility will make individualized determinations about how to ensure the safety of each inmate.</p> <p>An example of how this is put into practice is that inmates that identify as transgender are asked to complete the Gender Review Committee checklist. A Copy of a blank checklist was reviewed along with a copy of the checklist that was completed by an inmate who was at SCI-Huntingdon within the past 12 months. This checklist includes information provided by the inmate regarding how they self identify and also whether the inmate's current housing placement represents a safety or security concern for them. The Gender Review Committee meets and reviews the checklist and makes a determination for housing the inmate.</p>

Policy DC-ADM 008 Section 9 page 9-2 indicates that the purpose of the Gender Review Committee checklist is to make individualized determinations about transgender and intersex inmates' housing and programming assignments.

The staff member who performs screening for risk of victimization and abusiveness stated that they do use the information to enter housing concerns for the inmate being screened into the computer.

Housing decisions are based on the individual inmates score from the risk screening.

115.42 (c) In deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems.

DC-ADM 008 section 9 page 9-3 states that the agency/ facility makes housing and program assignments for transgender or intersex inmates in the facility on a case by case basis. A blank Gender Review Committee checklist was reviewed along with a completed checklist. SCI-Huntingdon PREA Compliance Manager Mandy Biser said that there is a Gender Review Committee that meets to review transgender inmates for appropriate housing. Transgender/ intersex inmates are transferred to another facility so that the inmate will have access to an individual shower. Transgender/ intersex inmates are met with individually. Transgender inmates are allowed to participate in programming with other transgender/ intersex inmates as well as taking part in video conferencing/ meetings with transgender groups in the community. SCI-Huntingdon has not had a case where a transgender inmate stated that they feel safe and requested to stay at the facility. The inmate's preference in housing is influential in the Gender Review Committee's determination on where he will be housed. The one transgender inmate that was housed at SCI-Huntingdon in the past 12 months had extremely feminine characteristics including the appearance of breasts and the Gender Review Committee felt it would be safer if they were transferred to a facility with individual curtained showers. This inmate arrived in disciplinary custody. During the audit a listing of inmates housed at SCI-Huntingdon who self identified as being gay, bisexual, transgender or intersex was provided. There are no inmates on this list that self identified as transgender or intersex.

115.42 (d) Placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety experienced by the inmate.

DC-ADM 008 section 9 page 9-6 directs that the Unit Manager and the PREA Compliance Manager shall meet with identified transgender or intersex inmates during the semi annual and annual review.

SCI-Huntingdon PREA Compliance Manager Mandy Biser said that placements and programming for transgender/ intersex inmates is conducted at a minimum every six months. Because of the design of SCI-Huntingdon transgender and intersex inmates are not housed there. (There are no individual showers)

115.42 (e) A transgender or intersex inmate's own views with respect to his or her own safety shall be given serious consideration.

SCI-Huntingdon PREA Compliance Manager Mandy Biser stated that they do give serious consideration to a transgender or intersex inmate's views with respect to their safety. Former SCI-Huntingdon PREA Compliance Manager Christian Garman stated that this determination would be made on a case by case basis as determined by the Gender review Committee. The committee bases their determination on input from the inmate in regards to their own safety.

Because of the design of SCI-Huntingdon transgender and intersex inmates are not housed there.

115.42 (f) Transgender and intersex inmates shall be given the opportunity to shower separately from other inmates.

Because of the design of SCI-Huntingdon transgender and intersex inmates are not housed there. There are no individual showers. All of the showers with the exception of those in the Restrictive Housing Units are group shower rooms.

Former SCI-Huntingdon PREA Compliance Manager Christian Garman stated that his recommendation for placement of an transgender or intersex inmate would be, immediately upon determination by the Gender Review Committee (within 24-72 hours) the inmate would be transferred to an institution that was able to provide individual showers/ be able to shower separately. Policy DC-ADM 008 section 9 page 9-2 requires that the PREA Compliance Manager meets privately with inmates who identify as transgender/ intersex within 5 business days of notification and complete the Gender Review Committee Checklist. The Gender Review Committee shall be scheduled to convene within 5 business days of that interview. He also stated that if an inmates safety is in question, SCI-Huntingdon will be contacting SC-Smithfield and both Superintendents will agree on the transfer to Smithfield and the inmate will be transferred within one business day.

The one transgender inmate that was received at CI-Huntingdon in the past 12 months arrived in disciplinary custody. Because of being housed in the Restrictive Housing Unit this inmate was able to have an individual shower.

115.42 (g) The agency shall not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.

David Radziewicz, the Pennsylvania Department of Corrections PREA Coordinator stated that there is a two step process when an inmate self identifies as lesbian, gay, bisexual, transgender or intersex. The first step is a review by the gender review committee. Then they pull together a larger committee to recommend if the inmate stays in the current facility or gender identified facility. If the committee or the inmate requests special placement it goes to Central Office for determination by a special committee that includes outside input. There are transgender women who have a penis in a female facility and another who has had surgery that is in a female facility.

SCI-Huntingdon PREA Compliance Manager Mandy Biser stated that they are not subject to a consent decree, legal settlement, or legal judgment requiring that it establish a dedicated facility, unit or wing for gay, bisexual, transgender or intersex inmates.

An inmate that identifies as gay stated that he had not been placed in a housing unit that was just for gay, bisexual, transgender or intersex inmates.

There have not been any consent decrees, legal settlements, or legal judgments requiring a facility to establish a dedicated facility, unit, or wing for lesbian, gay, bisexual, transgender, or intersex inmates.

SCI-Huntingdon does not have any units or wings on units that are designated to house gay, bisexual, transgender, or intersex inmates.

115.43	<b>Protective Custody</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and observations of practices that were in place during the audit tour.</p> <p>115.43 (a) Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.</p> <p>Pennsylvania Department of Corrections policy DC-ADM 008 section 2 page 2-6 prohibits the placement of inmates at high risk of sexual victimization involuntarily into Administrative Custody 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.</p> <p>An initial response checklist was reviewed. It reflects this requirement. DC-ADM 802 section 1 also states this.</p> <p>SCI-Huntingdon Superintendent Kevin Kauffman stated that they wouldn't place inmates at high risk of sexual victimization or who have alleged sexual abuse in to involuntary segregated housing. He said that they would find alternative housing for those inmates.</p> <p>There have not been any inmates at high risk of sexual victimization or who have alleged sexual abuse placed into segregated housing in the past 12 months.</p> <p>115.43 (b) Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document: (1) The opportunities that have been limited; (2) The duration of the limitation; and (3) The reasons for such limitations.</p> <p>A restrictive housing unit staff member was interviewed. He stated that if any inmate were placed in restrictive housing for protection from sexual abuse or after having alleged sexual abuse the inmates would have access to programs, privileges, education and work opportunities. The only difference would be that they would be escorted to these activities. There were no inmates housed in the restrictive Housing Unit for their protection from sexual abuse or because they made a sexual abuse allegation.</p> <p>115.43 (c) The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days.</p>	

SCI-Huntingdon Superintendent Kevin Kauffman stated that they would not place an inmate in Restrictive Housing for protection from sexual abuse or after having alleged sexual abuse. The Restrictive Housing unit staff member stated that if inmates were placed in Restrictive Housing for protection from sexual abuse or after having alleged sexual abuse it would only be until alternative means of separation could be arranged.

There have not been any inmates placed in restrictive Housing at SCI-Huntingdon for protection from sexual abuse or after having alleged sexual abuse in the past 12 months.

115.43 (d) If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, the facility shall clearly document: (1) The basis for the facility's concern for the inmate's safety; and (2) The reason why no alternative means of separation can be arranged.

SCI-Huntingdon states that they did not place any inmates at risk of sexual victimization in involuntary segregated housing in the past 12 months.

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

Although SCI-Huntingdon has not placed any inmates at risk of sexual victimization in involuntary segregated housing in the past 12 months policy DC-ADM 008 section 2 page 2-7 states that this type of placement shall not ordinarily exceed 30 days.

Restrictive housing unit staff stated that if inmates are housed in Restrictive Housing for risk of sexual victimization or who allege to have suffered sexual abuse that they are usually in this status for a week to 30 days but that it is usually within a weeks time that they are moved. There were no inmates in Restrictive Housing for protection from sexual victimization or who allege to have suffered sexual abuse.

115.51	<b>Inmate reporting</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1391 450">The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates and observations of practices that were in place during the audit tour.</p> <p data-bbox="252 495 1471 663">115.51 (a) The agency shall provide multiple internal ways for inmates to 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> <p data-bbox="252 707 1455 909">Pennsylvania Department of Corrections policy DC-ADM 008 section 3 page 3-2 outlines the multiple ways for inmates to report sexual abuse and sexual harassment, retaliation by other inmates or staff, for reporting sexual abuse and harassment and staff neglect or violation of responsibilities that may have contributed to such incidents. The PREA poster also includes information on ways for inmates to make a report.</p> <p data-bbox="252 920 865 954">Samples of inmate reports were also reviewed.</p> <p data-bbox="252 965 1471 1256">The random staff that were interviewed were all able to give multiple ways for inmates to report sexual abuse or sexual harassment, retaliation by other inmates or staff, for reporting sexual abuse or sexual harassment and staff neglect or violation of responsibilities that may have contributed to such incidents. These included reporting it to anyone in authority, telling a staff member, telling the PREA Compliance Manager, telling the Chaplain, report it anonymously, calling the phone number or writing the address that is on the posters by the phones.</p> <p data-bbox="252 1267 1455 1469">The random inmates that were interviewed said that they could report it to the counselor, call the phone number that is posted, tell a staff member, have someone on the outside make a report for them like their mother, tell the Lieutenant or tell the Warden. One inmate who had been incarcerated at SCI-Huntingdon for over twenty years stated that he would not report it but would take care of it himself.</p> <p data-bbox="252 1525 1471 1682">During the tour signs were observed posted by the unit telephones with information on how to make a report including an address that the inmates could write to in order to make a report. Inmates that were questioned during the tour were able to explain ways that they could make reports.</p> <p data-bbox="252 1738 1471 1984">115.51 (b) The agency shall also provide at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of the agency, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. Inmates detained solely for civil immigration purposes shall be provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security.</p> <p data-bbox="252 2040 1375 2119">DC-ADM 008 section 3 provides the address for the Sexual Abuse Reporting Address: BCI/PREA Coordinator. This information is also on the PREA posters.</p> <p data-bbox="252 2130 1471 2163">A copy of a tip left with Pennsylvania Crime Stoppers was attached and reviewed along with a</p>

letter sent to the Pennsylvania State Police.

SCI-Huntingdon and the PA DOC do not house inmates for civil immigration purposes.

PREA Compliance manager Mandy Biser said that there is an address on the PREA posters in place around the institution that the inmates can write to and make a report about sexual abuse and sexual harassment to a public entity that is not a part of the PA DOC. She also said that the inmates are able to remain anonymous when they write to this address.

The random inmates that were interviewed said that they could report it to the counselor, call the phone number that is posted, tell a staff member, have someone on the outside make a report for them like their mother, tell the Lieutenant or tell the Warden. Five of the inmates interviewed said that they were not sure if they could make a report without having to give their name.

The printed information provided to the inmates does not include information about being able to make a report anonymously but this information is part of the video "PREA: What you Need to Know".

115.51 (c) Staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports.

DC-ADM 008 section 3 page 3-1 directs that staff shall accept and document reports made verbally, in writing, anonymously, and from third parties and promptly forward to the facility's designated investigators. This information is also in the inmate handbook. Examples of reports from different sources were also reviewed.

Copies of staff reports of an inmate's who made a verbal report were reviewed.

The random staff interviewed all were able to acknowledge that there are multiple ways for inmates to make reports about sexual abuse and sexual harassment. They also said that if they received a verbal report that they would document it immediately or as soon as possible following the receipt of the report .

All but one of the random inmates that were interviewed were able to state multiple ways for them to make a report.

115.51 (d) The agency shall provide a method for staff to privately report sexual abuse and sexual harassment of inmates.

DC-ADM 008 section 3 page 3-4 lists options for staff to privately report sexual abuse and sexual harassment. This is also shown on the PREA posters.

Staff are made aware through the policy and also through the PREA posters.

The random staff gave a variety of ways in which they could privately make a report about sexual abuse or sexual harassment. These included writing to the address on the PREA posters, contacting the shift commander, the PREA Coordinator, the PREA Compliance Manager, the PREA Lt, using a phone in one of the offices to call in a report and pulling a supervisor to the side and making the report to them.

<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.52 (a) An agency shall be exempt from this standard if it does not have administrative procedures to address inmate grievances regarding sexual abuse.</p> <p>The Pennsylvania Department of Corrections does not have an administrative procedure in place to address inmate grievances regarding sexual abuse. Policy DC-ADM 008 section 1 page 1-1 states 2 "The Inmate Grievance System is intended to deal with a wide range of issues, procedures, or events that may be of concern to an inmate. It is not meant to address incidents of an urgent or emergency nature including allegations of sexual abuse. Any allegation of a sexual nature (abuse/harassment) against a staff member or inmate-on-inmate sexual abuse must be addressed through Department policy DC-ADM 008, "Prison Rape Elimination Act (PREA)." When faced with an incident of an urgent or emergency nature, the inmate shall contact the nearest staff member for immediate assistance."</p> <p>DC-ADM 008 section 3 pages 3-2 and 3-3 directs that inmate grievances regarding sexual abuse be forwarded to the Facility Grievance Coordinator, they shall reject the grievance and forward it to the facility Security Office and PREA Compliance Manager (PCM)/designee for tracking and investigation. The inmate shall be notified of this action.</p> <p>Policy DC-ADM 804 section 1 page 1-2 directs that a grievance regarding an allegation of a sexual nature (abuse/harassment) against a staff member or inmate-on-inmate sexual abuse will not be addressed through the Inmate Grievance System and must be addressed through Department policy DC-ADM 008.</p> <p>Copies of grievances were reviewed along with emails that were forwarded to the PREA investigators about the incidents the inmates were alleging in their grievances.</p>

115.53	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates a conversation with a staff member from The Abuse Network and observations of practices that were in place during the audit tour.</p> <p>115.53 (a) The facility shall provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations, and, for persons detained solely for civil immigration purposes, immigrant services agencies. The facility shall enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible.</p> <p>DC-ADM 008 section 4 page 4-7 provides for inmates to have access to outside victim advocates and also allows for inmates to have access to confidential communication with outside victim service providers.</p> <p>SCI-Huntingdon has a letter of agreement with The Abuse Network to provide outside victim support services. This information is available to the inmates in a brochure from The Abuse Network that inmates receive at orientation. The mailing address for The Abuse Network is included in this brochure.</p> <p>As an example of inmates being offered this service a letter from the PREA Compliance Manager to an inmate who alleged sexual abuse was reviewed. The letter outlines that the inmate was being provided with outside victim advocates for emotional support, who will be providing this support (The Abuse Network) and that the inmate will be able to speak with the victim advocate in a confidential setting. The letter includes an area for the inmate to indicate that they are accepting the services being offered or declining these services. The inmate signature is included with this letter.</p> <p>Of the random inmates interviewed two inmates felt that the address that was posted on the PREA posters was for services that are available outside of the facility. One of the inmates said that the services were available to get counseling. Another inmate said that he was aware of the services in the community because he had a sister who was raped. Three of the inmates did not know if there were services available outside of the facility.</p> <p>Two of the inmates knew that counseling services were available. Eight of the inmates interviewed knew that the contact information was available on either posters or brochures. One inmate said that he talked to outside service providers three times. Four of the inmates said that they could talk with these service providers anytime they needed to.</p> <p>An inmate who reported that he was sexually abused said that the address for outside services is on the PREA posters by the phones. He was able to speak to these people whenever he wanted to. During the tour the PREA posters were in place with contact information listed on them. The Abuse Network was contacted and it was verified that they do provide support for inmates that have been victimized at SCI-Huntingdon.</p> <p>SCI-Huntingdon does not house inmates for solely for civil immigration purposes.</p>

115.53 (b) The facility shall inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.

DC-ADM 008 section 3 page 4-7 directs that the PREA Compliance Manager 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.

Four of the random inmates interviewed said that they believe what they say to the outside providers is confidential. Three didn't know that it was confidential. One of the inmates indicated that the signs that are posted say that the communication is confidential. Two of the inmates knew that these providers would have to report either criminal activity or if someone was planning on hurting themselves or others.

An inmate that reported being sexually abused said that the conversation with the outside providers is confidential. He did not know of the circumstances where they could tell someone else about what was said.

The inmates are notified in a memo they are given when being offered the services of The Abuse Network that they will be able to meet with them in a confidential setting.

While some of the inmates were not aware that the services being offered would be confidential, information about this is provided to inmates in the form of a brochure that they are given at orientation and also it is available on posters that were observed throughout the facility.

115.53 (c) The agency shall maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse. The agency shall maintain copies of agreements or documentation showing attempts to enter into such agreements.

There is an MOU between SCI-Huntingdon and The Abuse Network. A copy of this agreement was reviewed.

A representative from The Abuse Network was called. They verified that they provide victim services to inmates at SCI-Huntingdon.

<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates and observations of practices that were in place during the audit tour and also by accessing the Pennsylvania Department of Corrections website and verifying that reporting information is posted.</p> <p>115.54 (a) The agency shall establish a method to receive third-party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate.</p> <p>Pennsylvania Department of Corrections policy DC-ADM 008 section 3 page 3-4 lists methods for SCI-Huntingdon to receive third-party reports of inmate sexual abuse or sexual harassment.</p> <p>The PA-DOC public website includes a link to a page that provides information on how to make a report of sexual abuse or sexual harassment. Information is also available on handouts given to inmates and on PREA posters.</p> <p>The Pennsylvania Department of Corrections provides inmates with an address that they can write to. This is the address for the Pennsylvania Bureau of Criminal Investigation. Inmates are also provided with an internet address that is a tip line used to report crimes. This information is also available on the PA DOC public website. This was verified by visiting their website.</p>

<b>115.61</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and observations of practices that were in place during the audit tour.</p> <p>115.61 (a) The agency shall 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; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</p> <p>DC-ADM 008 section 3 page 3-3 requires all staff including contractors and volunteers to immediately report to the Shift Commander if he/she has knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility. This policy also requires all staff including contractors and volunteers to report immediately any retaliation against inmates or staff who reported such incidents. Staff are also required to report immediately any staff neglect or violation that may have contributed to an incident or retaliation.</p> <p>The random staff that were interviewed stated that they are required to report 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; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Six of them said that they would report it to the shift commander. Two said they are required to report it and that they would also refer to the PREA first responder card that they are issued.</p> <p>115.61 (b) Apart from reporting to designated supervisors or officials, staff shall not reveal 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.</p> <p>Page 3-4 of DC-ADM 008 section 3 prohibits staff from revealing 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>The random staff interviewed indicated that they would make their reports to supervisors.</p> <p>115.61 (c) Unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners shall be required to report sexual abuse pursuant to paragraph (a) of this section and to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services.</p> <p>Both the medical and the mental health staff members interviewed said that they do disclose to the inmates the limitations of confidentiality and their duty to report. The inmates are</p>

required to sign a form acknowledging that they were provided this information. They are required to report any knowledge, suspicion or information regarding an incident of sexual abuse or sexual harassment to a designated supervisor upon learning of it. This would be to either the Shift commander or the PREA Lt. One of these staff members was made aware of an incident of sexual abuse at a prior facility. They did notify a supervisor about this.

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

There are no inmates at SCI-Huntingdon under the age of 18 or anyone considered a vulnerable adult.

115.61 (e) The facility shall report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators.

Superintendent Kauffman said that all allegations of sexual abuse and sexual harassment, including those from third parties, are reported directly to the PREA investigators.

<b>115.62</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and observations of practices that were in place during the audit tour.</p> <p>115.62 (a) When an agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate.</p> <p>DC-ADM 008 section 2 page 2-3 directs 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>Superintendent Kauffman said that if his facility becomes aware that an inmate is subject to a substantial risk of imminent sexual abuse, they would talk to the inmate and find out the factors, remove the potential abuser and begin an investigation.</p> <p>The random staff that were interviewed indicated that they separate the inmates and notify a shift commander. Some would secure the inmate in his cell for his protection and others would escort the potential victim out of the area to protect him.</p>

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<p data-bbox="252 168 901 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 246 526 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 1476 448">The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and observations of practices that were in place during the audit tour.</p> <p data-bbox="252 492 1476 616">115.63 (a) Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred.</p> <p data-bbox="252 660 1476 828">DC-ADM section 3 pages 3-4 and 3-5 requires that upon receiving an allegation that an inmate was sexually abused while confined at another facility it is the Facility Manager/designee’s responsibility to notify the head of the facility in which the reported abuse occurred.</p> <p data-bbox="252 840 1069 873">Examples of notifications that were made have been reviewed.</p> <p data-bbox="252 884 957 918">Follow ups to allegations were provided and reviewed.</p> <p data-bbox="252 929 1476 1052">The psychology &amp; medical departments follow-up according to policy. The PREA Lt. conducts interviews to obtain information to send to investigating facility. Retaliation monitoring is initiated by the Corrections Counselor.</p> <p data-bbox="252 1097 1476 1176">115.63 (b) Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.</p> <p data-bbox="252 1220 1476 1344">DC-ADM 008 section 3 page 3-4 requires that the notification be provided as soon as possible but no more than 72 hours after receiving the allegation. A sample of notification was reviewed. The notification occurred the same day as they received the allegation.</p> <p data-bbox="252 1388 1244 1422">115.63 (c) The agency shall document that it has provided such notification.</p> <p data-bbox="252 1478 1476 1556">DC-ADM 008 section 3 page 3-4 requires that a copy of the notification be sent to the PREA Compliance Manager.</p> <p data-bbox="252 1568 1284 1601">Notifications reviewed showed that the notifications were made within 72 hours.</p> <p data-bbox="252 1646 1476 1724">115.63 (d) The facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards.</p> <p data-bbox="252 1780 1476 1937">DC-ADM 008 section 3 page 3-5 requires that the Facility Manager/designee shall immediately notify the Security Office to initiate a PREA investigation upon notification of allegations from another facility. Examples of notification and subsequent investigations were reviewed.</p> <p data-bbox="252 1948 1476 2150">Superintendent Kauffman stated that when they receive an allegation from another facility or agency that an incident of sexual abuse or sexual harassment occurred at his facility the information is sent to the PREA investigators to complete an investigation. He indicated that samples of reports received from other facilities were included in the documentation that was uploaded for the PAQ.</p>

Samples of notifications and the subsequent investigations were reviewed. Appropriate investigations followed these notifications.

115.64	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates and observations of practices that were in place during the audit tour.</p> <p>115.64 (a) Upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report shall be required to: (1) Separate the alleged victim and abuser; (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; (3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and (4) If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.</p> <p>DC-ADM 008 section 4 page 4-1 outlines the agency's First Responder Duties. There is also a Shift Commander's checklist to be completed upon notification of an allegation of sexual abuse. This checklist was reviewed and is a well formatted easy to follow guide for the supervisors to use when they are notified that an allegation of sexual abuse. First Responder cards for staff were reviewed. They also are a guide with the steps that staff should follow when they are made aware of an allegation of sexual abuse.</p> <p>The policy requires that upon learning of an allegation that an inmate was sexually abused, the first staff member to respond shall immediately separate the alleged victim and alleged abuser.</p> <p>The policy also requires that the first security staff member secure any reported crime scene until appropriate steps can be taken to collect evidence.</p> <p>Staff are required to, 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.</p> <p>The staff that have acted as a first responder said that the first step he took was pulling the alleged victim out of his cell so that he can privately report what happened. He would contact the PREA Lt and forward all of the information to him. The inmate would be provided with a pamphlet for the outside services available to him and he would be provided with the form to formally request these services. He said that the Lt would initiate medical exams.</p> <p>The alleged victim would be instructed not to shower, brush teeth, wash or use the bathroom. This would be the same for the alleged abuser. The alleged abuser would also be offered medical and mental health services.</p> <p>The inmate who reported a sexual abuse stated that a staff person helped him the same day as he was assaulted. He told the counselor when he arrived. He said that the abuse happened when he was younger. He also said that the counselor talked with him after he reported what</p>

happened.

The PREA First Responder cards provided to all staff is an excellent resource and includes all of the elements of this standard. Several of the staff members referred to this card during the interview process. These cards are given out every year during update training.

115.64 (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, and then notify security staff.

DC-ADM 008 section 4 page 4-1 requires that 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. The policy also requires that they immediately notify the Shift Commander.

Copies of incident reports authored by non-security staff members were reviewed.

The staff that have acted as a first responder said that the first step he took was pulling the alleged victim out of his cell so that he can privately report what happened. He would contact the PREA Lt and forward all of the information to him. The inmate would be provided with a pamphlet for the outside services available to him and he would be provided with the form to formally request these services. He said that the Lt would initiate medical exams. The alleged victim would be instructed not to shower, brush teeth, wash or use the bathroom. This would be the same for the alleged abuser. The alleged abuser would also be offered medical and mental health services.

The random staff that were interviewed said that they would separate the inmates, notify the shift commander, stay with the inmate, secure the scene, refer to the PREA card and instruct not to shower or use the bathroom.

Samples of incident reports written by non-security staff who reported an allegation were reviewed.

This standard is found to exceed standards because of the information that staff are provided with. The first responder cards are a quick reference for staff to use to refer to if they become aware that an incident of sexual abuse has taken place.

The Shift Commander Checklist is another great tool for the supervisors to utilize when they are notified that an incident of sexual abuse happened. This document is comprehensive and includes areas for recording when contact has been made with the appropriate parties. It also is a step by step guide for them to use throughout the process.

<b>115.65</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff.</p> <p>115.65 (a) The facility shall develop a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p>SCI-Huntingdon policy 008 HUN 1 section 4 is the facilities plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators and facility leadership.</p> <p>Superintendent Kauffman stated that there is a procedure in place for SCI-Huntingdon regarding plans to coordinate the actions among staff first responders, medical and mental health practitioners, investigators and facility leadership in response to an incident of sexual abuse. This starts with the shift commander and is on the PREA cards.</p>

<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Audited at Agency Level
	<b>Auditor Discussion</b>
	<p>Union agreements were reviewed. An audit conducted at SCI-Mahoney conducted in October 2016 indicates that this standard was audited at the agency level.</p>

115.67	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates and observations of practices that were in place during the audit tour.</p> <p>115.67 (a) The agency shall establish a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff, and shall designate which staff members or departments are charged with monitoring retaliation.</p> <p>DC-ADM 008 prohibits retaliation against an inmate or staff member who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations. Section 3 of DC-ADM 008 page 3-5 provides for protection from retaliation. There is a retaliation monitoring form that was reviewed.</p> <p>Section 2 of DC-ADM 008 page 2-2 ensures that there is retaliation monitoring. SCI-Huntingdon has staff designated to monitor for retaliation.</p> <p>115.67 (b) The agency shall employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.</p> <p>Superintendent Kauffman stated that inmates are monitored by DSCS (Deputy Superintendent for Centralized Services). The problem inmate will be removed and they do as little as possible to disrupt the victim.</p> <p>The designated staff member charged with monitoring retaliation stated that he monitors the inmate that alleged the abuse. He will speak to the inmate and let him know that he can come talk if he needs to. This information is passed along up the chain of command. There is 30, 60 and 90 day monitoring and that can be extended past the 90 days. He said that the measures he takes to protect those who reported is to monitor the individual, pass the information along the chain of command, move the inmate off of the housing unit and separate the victim and the inmates that are harassing them.</p> <p>The inmate that reported sexual abuse stated that he guessed that he felt safe from possible revenge.</p> <p>115.67 (c) For at least 90 days following a report of sexual abuse, the agency shall monitor the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff, and shall act promptly to remedy any such retaliation. Items the agency should monitor include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The agency shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need.</p>

DC-ADM 008 section 3 page 3-6 requires that 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. DC-ADM 008 section 3 page 3-6 also requires that the Department shall continue monitoring beyond 90 days if the initial monitoring indicates a continuing need.

Superintendent Kaufman said that when they suspect retaliation they will remove a staff member from the area the retaliation is happening in and will also remove any inmates that are suspected of retaliation. They will also begin an investigation.

The Staff Member Charged with Monitoring Retaliation said that he looks for inmates being withdrawn, if the inmate normally goes to the yard and stays in cell he will call them in and talk with them. Nothing should be changed unless the inmate requests it.

The monitoring is done at 30, 60 and 90 days. He was not sure if there was a maximum length of time that the monitoring would continue for. He would continue as long as the inmate felt it was needed. This would be reviewed with the chain of command and a game plan would be developed. This could involve moving people around including moving staff out of the area. There have not been any incidents of retaliation in the past 12 months at SCI-Huntingdon. They have had two allegations of retaliation due to an unfounded result of an investigation and moved an inmate to another unit to separate him from the alleged perpetrator. The allegations of retaliation were not confirmed as actual retaliation incidents.

115.67 (d) In the case of inmates, such monitoring shall also include periodic status checks.

The monitoring is done at 30, 60 and 90 days and longer if needed.

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

Superintendent Kauffman said that they will move both staff and inmates from the area where the individual who reported the abuse is located. An investigation will be initiated into the retaliation.

<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and observations of practices that were in place during the audit tour.</p> <p>115.68 (a) Any use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse shall be subject to the requirements of § 115.43.</p> <p>DC-ADM 008 section 2 pages 2-6 and 2-7 states that 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.</p> <p>SCI-Huntingdon Superintendent Kevin Kauffman stated that they wouldn't place inmates at high risk of sexual victimization or who have alleged sexual abuse in to involuntary segregated housing. He said that they would find alternative housing for those inmates.</p> <p>A restrictive housing unit staff member was interviewed. He stated that if any inmate were placed in restrictive housing for protection from sexual abuse or after having alleged sexual abuse the inmates would have access to programs, privileges, education and work opportunities. The only difference would be that they would be escorted to these activities. He stated that if inmates were placed in Restrictive Housing for protection from sexual abuse or after having alleged sexual abuse it would only be until alternative means of separation could be arranged. He also stated that if inmates are housed in Restrictive Housing for risk of sexual victimization or who allege to have suffered sexual abuse that they are usually in this status for a week to 30 days but that it is usually within a weeks time that they are moved.</p> <p>There were no inmates placed in restrictive housing for risk of sexual victimization or who allege to have suffered sexual abuse in the past 12 months.</p>

115.71	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates and observations of practices that were in place during the audit tour.</p> <p>115.71 (a) When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.</p> <p>DC-ADM 008 section 5 is the PA-DOC's and SCI-Huntingdon's policy regarding criminal and administrative agency investigations. This policy provides direction that every report, complaint, or allegation of sexual abuse and sexual harassment, including third party and anonymous reports, shall be investigated promptly, thoroughly, and objectively. It also directs that if the case is being investigated for criminal charges that the PA DOC investigators will suspend the administrative investigation and allow the criminal investigation to take precedence. Criminal investigations are conducted by the Pennsylvania State Police.</p> <p>SCI-Huntingdon has a Lieutenant whose sole responsibility is PREA. He is responsible for conducting the majority of the PREA investigations. He stated that they begin an investigation the same day that the report is received depending on when they receive the report of the allegation. If the allegation were to come in towards the end of the work day or when they are off duty the investigation would begin as soon as they return to the facility. He also said that anonymous or third party reports of sexual abuse or sexual harassment are handled the same as any other investigation.</p> <p>There were 48 allegations of sexual abuse and sexual harassment received at SCI-Huntingdon in the past 12 months. All of these allegations were investigated.</p> <p>The auditor requested to review investigations that had been determined to be substantiated, unsubstantiated and unfounded. Four investigations were chosen and were reviewed completely and copies of those investigations were retained. These investigations show that the alleged victim is interviewed, the alleged perpetrator is interviewed and any witnesses are interviewed. Staff working in the area where the alleged incident occurred are interviewed and the CCTV system is reviewed for the area where the alleged incident occurred to determine if there was anything captured on the video to support or refute the allegation. One investigation was reported as sexual abuse but through the investigation it was determined that it was not sexual abuse but that sexual harassment had occurred. These four investigations were all found to be reports of sexual harassment so there was no physical evidence collected. The investigations are secured in a file cabinet in the PREA Lt's office.</p> <p>115.71 (b) Where sexual abuse is alleged, the agency shall use investigators who have received special training in sexual abuse investigations pursuant to § 115.34.</p> <p>The PREA investigator that was interviewed stated that he had received training specific to sexual abuse investigations in a confinement setting. The training included conducting</p>

interviews, evidence collection, Miranda and Garrity warnings and conducting complete investigations. The training was given by a State Trooper and was geared toward sexual abuse victims.

Training documentation that was reviewed support the claims made by the investigator.

115.71 (c) Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.

The PREA investigator stated that the first step he takes after he receives the investigation is to interview the alleged victim and get the details about what happened. He conducts a preliminary interview of the victim, has them submit a written statement, document the investigation and enter it into a tracking system. The Office of Special Investigation and Intelligence provides a case number. Witnesses are interviewed next, followed by the collection of evidence. The inmate may be sent out to see a SANE/SAFE nurse if within 96 hours for sexual abuse allegations. The investigator will collect videos from the area, review any pertinent documentation and then type up the investigation findings.

Investigations were reviewed along with the records retention schedule. The records will be retained for as long as the alleged abuser is incarcerated or employed by the PA DOC plus five years.

115.71 (d) When the quality of evidence appears to support criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

Policy DC-ADM 008 section 5 page 5-1 states that when the when the quality of evidence appears to support criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

The PREA investigator said that when they discover evidence that a prosecutable crime may have taken place they do consult with the Pennsylvania State Police/ prosecutors. The administrative case is suspended until the criminal case investigation is concluded so that the criminal investigation is not compromised.

There were no criminal investigations referred to a prosecutor in the past 12 months.

Administrative investigations were reviewed.

115.71 (e) The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person 's status as inmate or staff. No agency shall require an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.

The PREA investigator said that they judge the credibility of an alleged victim, witness or abuser on an individual basis. Inmates are never required to submit to a polygraph examination or to any other truth-telling device as a condition for proceeding with an investigation.

The inmate that reported that he was sexually abused was interviewed and reported that he was not asked to take a polygraph examination or submit to any other truth-telling device. Policy DC-ADM 008 section 5, page 5-2 states that the Department shall NOT require an inmate who alleges unwanted or forced sexual abuse to submit to a polygraph examination or other truth telling device as a condition of proceeding with the investigation of such an allegation.

115.71 (f) Administrative investigations: (1) Shall include an effort to determine whether staff actions or failures to act contributed to the abuse; and (2) Shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

The PREA investigator said that they look at all evidence when conducting their investigation. They look at the credibility of all involved. An assessment is conducted that looks at all of the findings. The investigation is reviewed by five supervisors before it is submitted. All administrative investigations are documented and include a description of physical and testimonial evidence and the investigative findings. The same is true for criminal investigations.

The incident review team looks at whether staff actions or failures to act contributed to the abuse.

Investigations were reviewed. There were not any substantiated cases of sexual abuse with in the past 12. There were no cases referred for prosecution.

115.71 (g) Criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible.

The PREA investigator stated that all criminal investigations are documented. They include all documents, a thorough description of all reports, notes, videos and anything else that is reviewed during the investigation. Physical and testimonial evidence is also included.

115.71 (h) Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution.

The PREA investigator stated that they refer case for prosecution when the evidence points towards a substantiated allegation and appears to be criminal.

There were no cases referred for prosecution in the past 12 months.

115.71 (i) The agency shall retain all written reports referenced in paragraphs (f) and (g) of this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

All written reports referenced in paragraphs (f) and (g) of this section are retained for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. This is mandated in policy DC-ADM 008 section 5 page 5-6 and also policy DC-ADM 008 section 1 page 1-4.

115.71 (j) The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation.

The PREA investigator stated that when a staff member alleged to have committed sexual abuse terminates employment prior to the conclusion of the investigation into his/ her conduct that the case will be referred to Law enforcement. If a victim who alleges sexual abuse or sexual harassment or an alleged abuser leaves the facility prior to a completed investigation into the incident they will continue with the investigation until it is complete. They will try to interview the inmates before they leave. They will follow at the other institution if the inmates were transferred.

115.71 (l) When outside agencies investigate sexual abuse, the facility shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.

Superintendent Kevin Kauffman indicated that they remain informed of the progress of sexual abuse investigations conducted by the Pennsylvania State Police because of the close working relationship that they have. They are in constant communication with the PSP.

PREA Coordinator David Radziewicz stated that the Pennsylvania State Police conducts the criminal investigations. They have a liaison that works with the PA DOC. Each facility has a relationship with a local investigator. The local security office is in contact with the investigator.

PREA Compliance Manager Mandy Biser said that they contact the Pennsylvania State Police for criminal investigations. They are in contact with the local investigator who is their point of contact with the PSP.

The PREA investigator said that he assists the Pennsylvania State Police with whatever they need. The institution will also conduct their own investigation but they avoid doing anything that would interfere with the criminal investigation.

<b>115.72</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and observations of practices that were in place during the audit tour.</p> <p>115.72 (a) The agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>DC-ADM 008 section 5 page 5-2 details the agency's evidence requirement: 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.</p> <p>When questioned as to what standard of evidence do they require to substantiate allegations of sexual abuse or sexual harassment the PREA investigator stated that they go by the preponderance of evidence.</p> <p>Investigations that were reviewed show that they do use the preponderance of evidence to substantiate allegations of sexual abuse or sexual harassment.</p>

115.73	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates and observations of practices that were in place during the audit tour.</p> <p>115.73 (a) Following an investigation into an inmate 's allegation that he or she suffered sexual abuse in an agency facility, the agency shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.</p> <p>DC-ADM 008 section 8 in the PA-DOC's policy for notifying inmates who make an allegations that they suffered sexual abuse in an agency facility is informed of the outcome of the investigation.</p> <p>DC-ADM 008 section 5 requires that the facility's PREA Compliance Manager to inform the alleged victim at the conclusion of the investigation.</p> <p>Copies of notifications made to alleged victims were reviewed.</p> <p>Superintendent Kauffman acknowledged that SCI-Huntingdon does notify an inmate who makes an allegation of sexual abuse when the allegation has been determined to be substantiated, unsubstantiated or unfounded following an investigation.</p> <p>The PREA investigator said that they do give an inmate a notice to an inmate who makes an allegation of sexual abuse when the allegation has been determined to be substantiated, unsubstantiated or unfounded following an investigation. The inmates signs and dates the form that they are given. If the inmate is at another institution the form is sent to that institution for the inmates signature and then sent back.</p> <p>The inmate who reported that he was sexually abused said that the prison staff tried to get him to sign paperwork that they couldn't prove that it happened, but he didn't sign it.</p> <p>Samples of notices given to inmates were reviewed along with the notices that were part of investigations that have been reviewed.</p> <p>115.73 (b) If the agency did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the inmate.</p> <p>A copy of an investigative report from the Pennsylvania State Police was reviewed. The notification to the alleged victim in the case provided was also reviewed.</p> <p>115.73 (c) Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever: (1) The staff member is no longer posted within the inmate's unit; (2) The staff member is no longer employed at the facility; (3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or (4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.</p>

DC-ADM 008 section 8 requires that following an inmate's allegation that a staff member committed sexual abuse against the inmate the agency or facility informs the inmate when the staff member is no longer posted within the inmate's unit, the staff member is no longer employed at the facility, the Department learns that the staff member has been criminally charged related to sexual abuse within the facility or the Department learns that the staff member has been convicted on a charge related to sexual abuse within the facility.

Investigative summary's have been reviewed.

The inmate who reported that he was sexually abused claimed that other inmates committed the abuse so he did not answer this question.

SCI-Huntingdon has had inmates make allegations about staff members but has not had any of those staff members indicted on a charge related to sexual abuse within the facility or convicted on a charge related to sexual abuse within the facility.

115.73 (d) Following an inmate's allegation that he or she has been sexually abused by another inmate, the agency shall subsequently inform the alleged victim whenever: (1) The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or (2) The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

DC-ADM 008 section 8 requires that following an inmate's allegation that he/she has been sexually abused by another inmate, the PCM shall subsequently inform the alleged victim whenever the Department learns that the alleged abuser has been criminally charged related to sexual abuse within the facility or the Department learns that the abuser has been convicted on a charge related to sexual abuse within the facility.

The inmate that reported that he was sexually abused stated that he hasn't been told if there were any charges brought against the inmates he claims sexually abused him. He said that he would have to send paperwork to SCI-Graterford and doesn't want anything with his name sent there.

SCI-Huntingdon has not had any allegations of sexual abuse sent for criminal charges in the past 12 months.

115.73 (e) All such notifications or attempted notifications shall be documented.

DC-ADM 008 section 8 requires that all notifications to inmates described under this standard are documented.

DC-ADM 008 section 1 page 1-3 requires that this form be maintained by the Security Office. Samples of notifications were reviewed.

The completed investigations that were reviewed included notifications to the inmate.

<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided and observations of practices that were in place during the audit tour.</p> <p>115.76 (a) Staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.</p> <p>DC-ADM 008 section 7 page 7-1 states that any employee who violates the Department's zero tolerance policy by engaging in, failing to report, or knowingly condoning sexual abuse or sexual harassment of an inmate shall be subject to appropriate disciplinary or administrative action up to and including termination.</p> <p>Human Relations policy 4.1.1 - 1 also contains this language.</p> <p>115.76 (b) Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.</p> <p>DC-ADM 008 section 7 page 7-1 states that any employee who violates the Department's zero tolerance policy by engaging in, failing to report, or knowingly condoning sexual abuse or sexual harassment of an inmate shall be subject to appropriate disciplinary or administrative action up to and including termination.</p> <p>Human Relations policy 4.1.1 - 1 also contains this language.</p> <p>There have not been any staff members terminated in the last 12 months for violating the Pennsylvania Department of Corrections sexual abuse and sexual harassment policy.</p> <p>115.76 (c) Disciplinary sanctions for violations of agency policies relating 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> <p>Human Relations policy 4.1.1 - 1 section 7 states that 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> <p>There were not any staff disciplined in the last 12 months for violating the Pennsylvania Department of Corrections sexual abuse and sexual harassment policy.</p> <p>115.76 (d) 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, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.</p>

ADM 008 section 7 page 7-1 states that 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, shall be reported to law enforcement agencies, unless the activity was not clearly criminal, and to any relevant licensing bodies.

Human Relations policy 4.1.1 - 1 section 7 also states this.

There have not been any staff members in the past 12 months reported to law enforcement or licensing boards following termination for violating the Pennsylvania Department of Corrections sexual abuse and sexual harassment policy.

<b>115.77</b>	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and observations of practices that were in place during the audit tour.</p> <p>115.77 (a) Any contractor or volunteer who engages in sexual abuse is 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.</p> <p>DC-ADM 008 section 7 page 7-1 states that 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. The policy also states that 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.</p> <p>There have not been any contractors or volunteers in the past 12 months reported to law enforcement for engaging in sexual abuse of inmates.</p> <p>115.77 (b) The facility takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p>SCI-Huntingdon has not had any allegations of sexual abuse or sexual harassment involving contractors or volunteers. The facility follows DC-ADM section 7 in regards to this. Superintendent Kevin Kauffman stated that if there is a case where a contractor or volunteer violates the Pennsylvania Department of Corrections sexual abuse or sexual harassment policy SCI-Huntingdon would prohibit that contractor or volunteer from having further contact with inmates. He also said the remedial training would be offered to prevent further incidents from happening.</p>

<b>115.78</b>	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and observations of practices that were in place during the audit tour.</p> <p>115.78 (a) Inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.</p> <p>DC-ADM 008 section 7 states that 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.</p> <p>Policy DC-ADM 801 section 4 Disposition of Charges and Misconduct charges was reviewed. There have not been any administrative or criminal findings of guilt in the past 12 months for inmate on inmate sexual abuse.</p> <p>115.78 (b) Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.</p> <p>Superintendent Kevin Kauffman reported that inmate sanctions given are dictated by policy, but they are proportionate to the nature and circumstances of the abuses committed, the inmate's disciplinary history and the sanctions imposed for similar offenses by other inmates with similar histories. An inmate's mental disability or mental illness is considered when determining sanctions.</p> <p>There have not been any findings of guilt in the past 12 months so there was no documentation for sanctions that could be reviewed.</p> <p>115.78 (c) The disciplinary process shall consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.</p> <p>Superintendent Kevin Kauffman reported that an inmate's mental disability or mental illness is considered when determining sanctions.</p> <p>There have not been any findings of guilt in the past 12 months so there was no documentation for sanctions that could be reviewed.</p> <p>115.78 (d) If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.</p> <p>DC-ADM 008 section 7 page 7-2 states that when an inmate is found guilty of a Class 1</p>

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. The PA DOC STANDARDIZED SEX OFFENDER TREATMENT PROGRAM MISSION STATEMENT states that It is the mission of the Pennsylvania Department of Corrections to provide to those inmates who are convicted of a sex offense under the Crime Codes of the Commonwealth of Pennsylvania with access to meaningful therapeutic intervention.

The mental health staff member interviewed stated that they do offer therapy, counseling or other intervention services designed to address and correct the underlying reasons or motivations for sexual abuse to the offending inmate. The inmates are not required to participate as a condition of access to programming or other benefits. The inmates are encouraged and offered the chance to participate but they can not be forced.

115.78 (e) The agency may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

DC-ADM 008 section 7 page states that 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. Copies of inmate discipline for sexual misconduct were reviewed. Copies of disciplinary records for inmates found guilty of sexual conduct with staff were reviewed.

115.78 (f) For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

DC-ADM 008 section 7 page 7-2 states that 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.

115.78 (g) An agency may, in its discretion, prohibit all sexual activity between inmates and may discipline inmates for such activity. An agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced.

DC-ADM 008 section 7 page 7-2 states that 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. Copies of discipline and the review for victimization was also reviewed.

115.81	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates and observations of practices that were in place during the audit tour.</p> <p>115.81 (a) If the screening pursuant to § 115.41 indicates that a prison/jail inmate has experienced prior sexual victimization, 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 medical or mental health practitioner within 14 days of the intake screening.</p> <p>Pennsylvania Department of Corrections policy DC-ADM 008 section 2 page 2-13 states that if the screening pursuant to PREA Standard 28 C.F.R. §115.41 indicates that a prison or jail inmate has experienced prior sexual victimization, 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 medical or mental health practitioner within 14 days of the intake screening or sooner, if clinically indicated.</p> <p>A copy of a Notification of Sexual Abuse/ Harassment allegation to Another Facility was reviewed.</p> <p>A blank copy of a POST SEXUAL ASSAULT INTERVIEW form was reviewed along with copies of completed forms.</p> <p>The staff member responsible for risk screening was interviewed and he stated that if an inmate were to reveal that they have experienced prior sexual victimization whether in an institutional setting or in the community he would try to get as many specifics as possible and then report it to the PREA Lt. Another staff member responsible for risk screening said that they would also contact Lt Maxwell, the PREA Lt and that they were not involved with the follow ups.</p> <p>Completed notifications/ referrals for inmates that disclosed sexual victimization during the screening were reviewed along with reports for inmates that were seen following a referral. There was both medical and mental health follow up with these inmates.</p> <p>115.81 (b) If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening.</p> <p>DC-ADM 008 section 2 states that If the screening pursuant to PREA Standard 28 C.F.R. §115.41 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 a mental health practitioner within 14 days of the intake screening, or sooner, if clinically indicated.</p> <p>A copy of a follow up interview with an inmate who previously perpetrated sexual abuse was</p>

reviewed.

A copy of the mental health referral form was reviewed.

The staff members are responsible for risk screening said that they know about inmates who previously perpetrated sexual abuse being offered a follow up meeting with a mental health practitioner.

Documentation was provided that shows that an inmate who previously perpetrated sexual abuse was offered a follow up with a mental health practitioner and did meet with them. There was only one inmate admitted to SCI-Huntingdon in the past 12 months who admitted that he had previously perpetrated sexual abuse.

115.81(c) is not applicable as SCI-Huntingdon is a prison and not a jail.

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

DC-ADM 008 section 2 page 2-13 states that 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.

Copies of information that was shared was reviewed.

There are policies in place that limit the access to information related to sexual victimization or abusiveness that occurred in an institutional setting.

115.81 (e) Medical and mental health practitioners shall 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.

A copy of a blank MENTAL HEALTH INFORMED CONSENT DOCUMENT was reviewed.

DC-ADM 008 section 2 page 2-14 states that medical and mental health practitioners shall 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.

A copy of a completed Mental Health Informed Consent document was reviewed.

Both the medical and the mental health staff members interviewed stated that they do get informed consent before reporting about prior sexual victimization that did not occur in an institutional setting. One did say that it was covered under a consent that the inmate signs but that the consent is usually not needed.

115.82	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates and observations of practices that were in place during the audit tour.</p> <p>115.82 (a) Inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment.</p> <p>DC-ADM 008 section 4 page 4-2 states that alleged inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment.</p> <p>A copy of a Medical Injury/ Incident report was reviewed.</p> <p>The medical staff member that was interviewed stated that inmate victims of sexual abuse do receive timely and unimpeded access to emergency medical treatment. They will do the paperwork immediately to request to have the inmate sent to the hospital. This usually takes less than an hour to have the inmates sent out. These services are provided based on policy but also the medical practitioners judgment based on the injuries that the inmate has.</p> <p>The mental health staff member said that a mental health practitioner will meet with the inmate and monitor them along with the outside provider. These meeting usually happen the same day as the report is received that the abuse occurred. (This meeting may take place on the next day depending on work requirements and when the abuse occurred such if it happens late in the day or at night.) The nature and scope of these services are based on their professional judgment.</p> <p>The inmate who reported that he was sexually abused stated that they sent him to talk with a counselor.</p> <p>PREA posters were in place that inform inmates what services are available to them. The PREA brochure that is given to the inmates instructs them to seek medical attention if they are the victims of sexual abuse.</p> <p>115.82 (b) If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant to § 115.62 and shall immediately notify the appropriate medical and mental health practitioners.</p> <p>One staff member who acted as a first responder stated that when they are notified about an allegation of sexual abuse that the first step they take is to pull the alleged victim out of his cell so that the inmate can privately report what happened. He would then contact the PREA Lt and forward all information to him. The inmate would be given the pamphlet for outside support services and would be given the form to sign to formally ask for the outside support services. They are given supportive counseling. He said that the Lt would initiate to have a</p>

medical examination conducted. The alleged victim would be instructed not to shower, brush their teeth, wash or use the bathroom. This would also be the same for the alleged perpetrator. The cell or area where the alleged abuse occurred would be secured. Another staff member who was a first responder said that they would pull the inmate into a private area and talk to them initially. They would make note of the time and date, contact the PREA Lt and forward the information to the "PREA Review Assessment Team". Immediately after they would direct the inmate not to shower or brush their teeth or use the bathroom. They would talk to the perpetrator and instruct them not to shower, brush their teeth or use the bathroom. Finally they would escort the alleged victim to medical.

Documentation of medical and mental health follow up was reviewed and showed that the inmates were seen the day they reported the alleged abuse.

115.82 (c) Inmate victims of sexual abuse while incarcerated shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

The medical staff member that was interviewed said that information about and access to sexually transmitted infection prophylaxis is provided to the inmate.

The inmate that was interviewed who reported sexual abuse stated that when he arrived at SCI-Huntingdon he was given a blood test but was not given any vaccinations. (Alleged abuse occurred at another facility)

There is a policy in place that directs that alleged victims be offered testing for sexually transmitted infections and also being provided timely access to sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

115.82 (d) Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

DC-ADM 008 Section 4 page 4-2 states that treatment services shall be provided to the alleged victim without financial cost and regardless of whether the alleged victim names the abuser or cooperates with any investigation arising out of the incident.

The inmate that reported that he was sexually abused stated that he was provided with the services and treatment for free. The policy also directs that treatment services will be offered at no cost to the inmate.

115.83	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1391 450">The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and inmates and observations of practices that were in place during the audit tour.</p> <p data-bbox="252 499 1461 622">115.83 (a) The facility shall offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.</p> <p data-bbox="252 669 1481 792">DC-ADM 008 section 4 page 4-8 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 any prison, jail, lockup, or juvenile facility.</p> <p data-bbox="252 797 1445 1010">Medical and mental health evaluations and, as appropriate treatment is provided to inmates that have been victimized by sexual abuse in a confinement facility. The mental health staff reinforced this by saying that a clinical evaluation is conducted for inmates that have been victims of sexual abuse. This includes scheduled follow up appointments at 30 day intervals unless the practitioner feels the inmate should be met with more frequently.</p> <p data-bbox="252 1057 1474 1180">115.83 (b) The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.</p> <p data-bbox="252 1227 1471 1563">The mental health staff reinforced this by saying that a clinical evaluation is conducted for inmates that have been victims of sexual abuse. This includes scheduled follow up appointments at 30 day intervals unless the practitioner feels the inmate should be met with more frequently. Treatment plans are developed that include the frequency of the meetings. Treatment notes for inmates who reported that they were sexually abused were reviewed and show that inmates will be followed up with as needed based on the practitioners findings. The inmate who reported that he was sexually abused said that follow up services were discussed with him.</p> <p data-bbox="252 1612 1401 1691">115.83 (c) The facility shall provide such victims with medical and mental health services consistent with the community level of care.</p> <p data-bbox="252 1740 1465 1953">Both the medical and the mental health staff members that were interviewed stated that the care the inmates receive care that is consistent with the community level of care. The mental health care exceeds what is offered in the community based on the ability of the inmates to meet with a mental health professional in a timely manner instead of having to try to make an appointment and wait to be seen.</p> <p data-bbox="252 2000 1481 2123">Documentation provided and observations of the medical and mental health areas of the institution show that the services are consistent with the community level of care. This is also a requirement of policy D-ADM 008 section 4.</p>

115.83 (d) Inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests.

No females are housed at SCI-Huntingdon

115.83 (e) If pregnancy results from the conduct described in paragraph (d) of this section, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.

No females are housed at SCI-Huntingdon

115.83 (f) Inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate

DC-ADM 008 section 4 page 4-8 states that alleged inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections, as medically appropriate.

A copy of a Medical Incident/ Injury report where testing was ordered was reviewed.

The inmate who reported that he was sexually abused stated that he was given a blood test for sexually transmitted infections.

Medical records reviewed show that this testing for sexually transmitted infections is being offered.

115.83 (g) Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

DC-ADM 008 section 4 page 4-2 states that treatment services shall be provided to the alleged victim without financial cost and regardless of whether the alleged victim names the abuser or cooperates with any investigation arising out of the incident.

The inmate who reported that he was sexually abused stated that he was provided treatment for free.

115.83 (h) All prisons 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.

DC-ADM 008 section 2 page 2-13 states that 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.

The mental health staff member interviewed stated that they do conduct an evaluation of all known inmate-on-inmate abusers and offer treatment if appropriate. They try to see the abuser the same day and conduct further evaluations as needed. The abuser will also be seen following their due process hearing.

Records of an abuser being given an evaluation was reviewed.

<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<p data-bbox="252 168 901 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 246 523 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 1476 436">The determination for this standard was made after reviewing the policies and other documentation that was provided, interviews with staff and observations of practices that were in place during the audit tour.</p> <p data-bbox="252 492 1476 616">115.86 (a) The facility shall conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded.</p> <p data-bbox="252 660 1476 907">Pennsylvania Department of Corrections policy DC-ADM 008 section 6 page 6-1 states that each facility shall conduct a Sexual Abuse Incident Review (SAIR) at the conclusion of every sexual abuse investigation where the allegation was substantiated or unsubstantiated whether the investigation was conducted by the facility Security Office or by the Office of Special Investigations and Intelligence (OSII). No review will be conducted if the allegation has been determined to be unfounded.</p> <p data-bbox="252 918 1452 1041">A copy of a blank Sexual Abuse Incident review along with completed copies were reviewed. Completed administrative investigations were reviewed. Copies of incident reviews were reviewed and found complete.</p> <p data-bbox="252 1086 1332 1176">115.86 (b) Such review shall ordinarily occur within 30 days of the conclusion of the investigation.</p> <p data-bbox="252 1220 1452 1344">DC-ADM 008 section 6 page 6-1 states that the review shall occur within 15 working days of the receipt of the notification from OSII that the investigation was deemed satisfactory. Completed administrative investigations were reviewed.</p> <p data-bbox="252 1355 1476 1433">Samples of incident reviews that were provided show that the reviews occurred within 30 days of the conclusion of the investigation.</p> <p data-bbox="252 1478 1428 1556">115.86 (c) The review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.</p> <p data-bbox="252 1601 1452 1814">DC-ADM 008 section 6 page 6-1 lists the staff that are part of the Sexual Abuse Incident Review. This includes upper level management officials. Copies of Sexual Abuse Incident reviews were reviewed. They include upper level; management officials. There are areas on the form for input from line supervisors, investigators and medical and mental health practitioners.</p> <p data-bbox="252 1859 1476 2150">Superintendent Kevin Kauffman stated that SCI-Huntingdon does have a sexual abuse incident review team and that the team does include upper level management officials and allows for input from line supervisors, investigators and medical or mental health practitioners. The review team meeting minutes that were reviewed showed that the review team was made up of Deputy Superintendents, Majors, Captains, Unit Managers, the Healthcare Administrator, the PREA Lt and the PREA Compliance Manager. Other reviews included the Superintendent along with the staff mentioned above.</p>

115.86 (d) The review team shall: (1) Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; (2) Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; (3) Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; (4) Assess the adequacy of staffing levels in that area during different shifts; (5) Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and (6) Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section, and any recommendations for improvement and submit such report to the facility head and PREA compliance manager.

Reports are prepared and any recommendations for improvement are submitted to the facility head and PREA Compliance Manager.

DC-ADM 008 section 6 states that the PCM shall submit the report to the Facility Manager for review. Upon approval, the report shall be returned to the PCM.

Copies of incident reviews were reviewed.

The incident review minutes that were provided show that the incident review teams look at all aspects of this provision (d)(1) through (d) (5) and a report is submitted along with any recommendations for improvement.

Superintendent Kauffman stated that this is a lengthy process and is handled properly.

PREA Compliance Manager Mandy Biser that all substantiated and unsubstantiated incidents are reviewed. Central Office will randomly select incident reviews and send back to the institution for corrective action. She said that the reports are forwarded to her for review. She said that there have not been any trend noticed and that most of the incidents are determined to be unsubstantiated. If the review determines that corrective actions need to take place a plan of action follow up begins.

A member of the incident review team stated that all areas in this provision are considered when the incident review team conducts their review. The team will examine the area in the facility where the incident allegedly occurred and they will also review any video from the time of the incident. The team assesses the adequacy of the staffing levels in the area during the incident and stated that there is mandated overtime to make staffing levels a non-issue.. Cameras have been added to units and other cameras have been updated to enhance monitoring,

115.86 (e) The facility shall implement the recommendations for improvement, or shall document its reasons for not doing so.

Copies of recommendations for Plans of Action following an Incident Review were reviewed.

<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Audited at Agency Level
	<b>Auditor Discussion</b>

<b>115.88</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Audited at Agency Level
	<b>Auditor Discussion</b>

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

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.401 (h) The auditor shall have access to, and shall observe, all areas of the audited facilities.</p> <p>Full access was given during the audit tour. All housing units, recreation areas, maintenance, education, medical, industries, garages and warehouses were toured. SCI-Huntingdon was very open and willing to grant access to whatever areas the auditors wished to see. This included allowing the auditors to enter the institution at 5:00 am in order to interview third shift staff.</p> <p>115.401 (i) The auditor shall be permitted to request and receive copies of any relevant documents (including electronically stored information).</p> <p>All requested copies were provided to the auditors.</p> <p>115.401 (m) The auditor shall be permitted to conduct private interviews with inmates.</p> <p>The auditors were given a list of inmates housed at the facility. Random inmate names were selected and those inmates were brought in to be interviewed. The interviews were conducted in private without staff from the institution present.</p> <p>115.401 (n) Inmates shall be permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.</p> <p>During the audit tour the audit notice was observed to be placed throughout the institution. The inmates that were interviewed were aware of the posting. The auditor received letters from inmates prior to the audit taking place and one that was received in the auditor's mail while the audit was taking place. The notice that was posted included information that the correspondence with the auditor was confidential. It included the contact information for the auditor and also the dates that the audit was going to be taking place.</p>

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Audited at Agency Level
	<b>Auditor Discussion</b>

## Appendix: Provision Findings

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

115.11 (c)	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	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)	<b>Contracting with other entities for the confinement of inmates</b>	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of 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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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