

# PREA Facility Audit Report: Final

**Name of Facility:** Quehanna Boot Camp

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 11/30/2017

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> Julie Ustruck Wetzel	<b>Date of Signature:</b> 11/30/2017

AUDITOR INFORMATION	
<b>Auditor name:</b>	Ustruck-Wetzel, Julie
<b>Address:</b>	
<b>Email:</b>	Julie.UstruckWetzel@wisconsin.gov
<b>Telephone number:</b>	
<b>Start Date of On-Site Audit:</b>	10/18/17
<b>End Date of On-Site Audit:</b>	10/18/17

FACILITY INFORMATION	
<b>Facility name:</b>	Quehanna Boot Camp
<b>Facility physical address:</b>	4395 Quehanna Highway, Karthaus, Pennsylvania - 16845
<b>Facility Phone</b>	814-263-4125
<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>	James Stover	<b>Title:</b>	CCPM
<b>Email Address:</b>	jastover@pa.gov	<b>Telephone Number:</b>	814-263-3904

Warden/Superintendent			
<b>Name:</b>	Mary Natoli	<b>Title:</b>	Superintendent
<b>Email Address:</b>	mnatoli@pa.gov	<b>Telephone Number:</b>	814-263-3932

Facility PREA Compliance Manager			
<b>Name:</b>	Jim Stover	<b>Email Address:</b>	jastover@pa.gov

Facility Health Service Administrator			
<b>Name:</b>	Kim Merrow	<b>Title:</b>	RNS
<b>Email Address:</b>	kmerrow@pa.gov	<b>Telephone Number:</b>	814-263-4125 ex 3195

Facility Characteristics		
<b>Designed facility capacity:</b>	606	
<b>Current population of facility:</b>	440	
<b>Age Range</b>	Adults: 440	Youthful Residents: 0
<b>Facility security level/inmate custody levels:</b>	2	
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	213	

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 Radziewicz	<b>Email Address:</b>	dradziewicz@pa.gov



## 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 (PREA) audit of SCI-Quehanna Boot Camp located at 4395 Quehanna Highway, Karthus PA was conducted by certified PREA auditors Julie Ustruck Wetzel and Emil Toney, assisted by Leigha Weber. The three auditors are employees of the State of Wisconsin, Department of Corrections. The audit was conducted as part of a consortium between the states of Pennsylvania, Maryland, Michigan, and Wisconsin.

In preparation for the on-site audit scheduled for October 18, 2107, audit notices were sent and posted on all housing units and common areas of the facility. The notices included the purpose, the date of the on-site visit, confidentiality, and auditor contact information. As requested, photographs depicting the notices displayed in various locations throughout the facility were emailed to confirm timely placement. Photographs submitted included sign placement on the following housing units: CB, DA, DD, DE, DG, DH as well as the inmate dining hall, staff dining hall, and the main entrance of the facility. No correspondence was received from staff or inmates at SCI-Quehanna Boot Camp.

The Pre-Audit Questionnaire was completed and submitted via the PREA Online Audit System (OAS) by facility staff. Prior to the on-site visit, this auditor reviewed the Pre-Audit Questionnaire and all of the attached documents. Attached documents included DC-ADM 008 PREA Policy and Procedures Manual, DC-ADM 008-QUE, Human Resource Policies, examples of forms indicating facility procedures, training records, hiring documents, investigations, and Memorandums of Understanding. Additionally, this auditor reviewed the agency's website specific to SCI-Quehanna Boot Camp and Pennsylvania DOC PREA information, including the SCI-Quehanna Boot Camp final 2016 PREA Audit report. Further, this auditor reviewed the facility layout provided by the PREA Compliance Manager. The documents and information submitted as part of the Pre-Audit Questionnaire were detailed and thorough, providing a clear picture of the policies, procedures, and operations of SCI-Quehanna Boot Camp.

The on-site portion of the audit was conducted on October 18, 2017. The day began with an entrance meeting with the audit team and key staff of SCI-Quehanna Boot Camp. Present were: Superintendent Mary Natoli; Deputy Superintendent for Facilities Management Major Frazer Blake; Deputy Superintendent for Centralized Services Kenneth Hollibaugh; PREA Compliance Manager and Corrections Classification and Program Manager Jim Stover; Captain Scott Carter; Nurse Supervisor Kimberly Merrow; Unit Manager Ellen McMahon; Unit Manager Clint Youngfleish; Correctional Food Service Manager Walter Stanton; Clerical Supervisor Jacquelyn Wick; Lt Kaschalk; Lt Johnson, Investigations; Corrections Superintendent's Assistant Melissa Bilotte; Facilities Maintenance Manager Bamat; and Central Office Staff David Fischer and Angel Baez-Sprague. The meeting consisted of introductions, a brief overview of the facility programming, and schedule for the visit.

Following the entrance meeting, the auditors were provided a comprehensive facility tour including all of the living units, with and without inmate assignments, classrooms, chapel/volunteer area, library, contact

visitation, control, maintenance, warehouse, laundry, re-entry, bakery, kitchen, dining halls, commissary, medical, intake/processing, outside grounds maintenance including electrical and garage. During the tour, audit notices were visible on each housing unit and throughout the institution. Camera and mirror placements were noted and facility updates as it relates PREA and safety were discussed.

All but one of the housing units was open bay barracks style with general bathrooms. The bathrooms were located next to the officer's station and designed to allow sight and sound supervision of inmates; yet afford inmates privacy to shower and toilet. One female housing unit was set up with rooms housing two to four inmates. The rooms did not have doors and the showers were located next to the door but afforded privacy to the inmate with a curtain covering the entrance but keeping the feet and floor visible. All of the housing units had four cameras as well as the use of mirrors. All of the housing units had PREA Audit notices posted and first responder procedures at the officer's station. As the tour group entered a housing unit, the first staff of the opposite gender entering the housing unit announced their presence on the unit with "female on deck" or "male on deck". In unison, the inmates responded with "ma'am, decent ma'am" or "sir, decent, sir". Visible throughout the tour were cameras and mirrors to minimize blind spots and ensure the safety of staff and inmates.

Following the facility tour, staff and resident interviews were conducted and investigative files were reviewed. Interviews of staff and inmates were conducted by the audit team and occurred in private offices in administration. All staff and inmates, who were offered an interview, accepted the interview. Interviews were conducted using the DOJ protocols that questions PREA knowledge, including knowledge of a variety of PREA protections for inmates and reporting mechanisms available to staff and inmates. Staff and inmates, alike, were aware of the zero tolerance policy and the rights of inmates to be free from sexual abuse and harassment. Staff was well aware of their responsibilities in assuring these rights are being met and should an incident occur, their role in responding. Informal interviews of staff also occurred during the tour.

A total of 26 staff were interviewed. Random staff interviews were chosen based on the shift and housing unit assignment and included Correctional Officers and Sergeants. All housing units and all three shifts were represented in the staff interviews. Specialized Interviews were also conducted of staff that were chosen based on the responsibilities and assigned duties. Some staff were assigned multiple duties and therefore were able to answer more than one specialized interview. The following specialized interviews were conducted: Superintendent, PREA Compliance Manager, Human Resources, medical staff, staff who conduct investigations, staff on the incident review team, intermediate or higher level facility staff, staff who perform intake and screening for victimization and abusiveness, staff who monitor for retaliation, first responders, staff responsible for volunteer coordination, and volunteers. The following specialized staff interviews did not occur: Agency Contract Administrator, line staff who supervise youthful inmates, education and program staff who work with youthful inmates, staff who supervise inmates in segregated housing, and staff who conduct cross-gender non-medical strip searches. SCI-Quehanna Boot Camp does not house youthful offenders, it does not utilize segregated housing, and non-medical cross-gender strip searches do not occur. The Agency Head was interviewed on 9/29/17 by PREA Auditor Maria Siloa-Johnson. Notes from the interview were referenced for this audit.

Thirty inmates were interviewed, consisting of random and targeted interviews according to the DOJ interview protocols. A youthful inmate and an inmate in segregated housing were not interviewed as SCI-Quehanna Boot Camp does not house youthful inmates or utilize segregated housing. Inmates answered consistently that staff of the opposite gender of the unit announce themselves upon entering the unit, they are aware of their rights to be free from sexual abuse and harassment and have a right not to be

punished for reporting. Inmates consistently indicated they were asked questions about sexual safety the day they arrived at the facility, and again shortly after they arrived. All inmates knew at least one manner in which to report sexual abuse or harassment, and overwhelmingly, many of the inmates were comfortable they could tell staff. Inmates acknowledged feeling safe at SCI-Quehanna and believed that staff are compassionate and caring.

Many documents and file material was available through the Pre-Audit Questionnaire. However, on the Pre-Audit Questionnaire, it was indicated that there had not been any PREA allegations for the twelve months preceding the audit. Upon arrival to the facility, it was brought to the auditors' attention that two harassment allegations had recently been reported. The investigative files and paperwork were reviewed during the on-site visit.

At the conclusion of interviews, an exit meeting was conducted with Deputy Superintendent for Facilities Management Major Frazer Blake, PREA Compliance Manager and Corrections Classification and Program Manager Jim Stover, and Lt Johnson. Preliminary audit findings were discussed. It should be noted that facility staff were professional, accommodating, and attentive to detail throughout the audit process. It was evident in interviews with staff and inmates, document review, and observations made of the facility during the tour, that the sexual safety and the well-being of inmates is taken seriously. SCI-Quehanna Boot Camp leadership has made PREA compliance a high priority and has devoted time and resources training staff and educating inmates. The spirit of PREA is embraced and incorporated into everyday life at SCI-Quehanna Boot Camp.

During the post-audit phase, additional interviews were conducted with community agencies providing support to inmates at SCI-Quehanna Boot Camp. The head of the emergency room at Mt. Nittany Hospital was interviewed on 11/22/17. Mt. Nittany provides emergency services and SANE exams for inmates at SCI-Quehanna Boot Camp. Mt. Nittany trains all of their nursing staff to conduct SANE exams, allowing every shift to have a nurse on duty that can provide this service. Mt. Nittany male nurses will examine male inmates and female nurses examine female inmates, except in emergency situations and the same gender staff is not on shift. The Direct Service Provider from Passages Inc. 2 was also interviewed on 11/22/17. Passages Inc. 2, provides support groups for female inmates and individual counseling for male inmates in need of coping and support in response to sexual victimization. Additionally, Passages Inc. 2 is available to provide advocacy services to inmates. Confidential releases of information are signed by inmates allowing the facility to reach out to Passages Inc. 2 and Passages Inc. 2 also asks inmates to sign a confidential release of information. Both community providers indicated that SCI-Quehanna Boot Camp does a good job ensuring inmate sexual safety and that staff are accommodating to the community agencies to treat and support victims.

Follow up questions and clarifications were also addressed with the PCM during the post-audit phase.

## AUDIT FINDINGS

### Facility Characteristics:

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

SCI-Quehanna Boot Camp opened in June 1992 as the Pennsylvania Department of Corrections' first military-style motivational boot camp. In 2002, Quehanna was accredited as an adult boot camp and in 2009 was accredited as an adult correctional institution with re-accreditation in 2012. The boot camp program is a six month traditional military style boot camp focusing on treatment, education, and work with a focus on self-discipline. SCI-Quehanna Boot Camp also house offenders sentenced to State Intermediate Punishment (SIP) Program, a 24 month sentence with includes treatment programs designed to assist inmates with drug and alcohol dependence. An inmate at SCI-Quehanna Boot Camp under the SIP program participates in an intensive four month alcohol and drug treatment program with rigid rules and expectations. Inmates in the SIP program are considered General Population. Unique to the Department, SCI-Quehanna Boot Camp accommodates both male and female inmates in both programs.

SCI-Quehanna Boot Camp is located on 30 acres in Clearfield County. It operates 9 double bunk open bay barracks-style, 50 bed male units, one double bunk open bay barracks-style 56 bed male unit, one double bunk open bay barracks-style, 50 bed female unit, and one 48 bed female unit, housing inmates in rooms that accommodate 2, 3, or 4 inmates. SCI-Quehanna Boot Camp currently operates 5 male boot camp units, 4 SIP units, and one Pre-Programming Unit. There is one female Boot Camp Unit and one SIP Unit. Eight of the ten male housing units are in the main building with Administration, kitchen and dining halls, and two are stand alone buildings. The two female housing units are stand alone buildings with a state highway running through the center of the facility, separating the male and female housing units. Currently 213 staff are employed at SCI-Quehanna Boot Camp. The layout of the barracks style units are the same, in that the showers and bathroom facility is next to the officer's station. The area is designed to allow staff sound and sight supervision, yet allows the inmate to shower and toilet in private. The showers are individual stalls with a curtain that covers the midsection. The toilets are also individual stalls with a privacy covering. The female unit with multiple inmate rooms does not have doors to the rooms to conceal the room's contents. The shower is located next to the room entrance and is covered by a curtain. At no time should a staff of the opposite gender see an inmate in undress. On the outside of each main living unit door is a sign reminding staff of the gender of the unit and per PREA standards, must announce their presence if of the opposite gender. This occurs by the staff announcing "male on deck" or "female on deck" with the inmates responding in unison. Additionally, line staff and supervisory staff make regular rounds to the housing units and other areas of the facility. Further, multiple cameras are utilized on each housing unit and monitored by a dedicated post. Mirrors augment safety and security on each housing unit.

At the time of the audit, the population was 455. One male unit is currently undergoing renovations and another male unit is temporarily not in use. In addition to the housing units and administration, there is a building housing maintenance shops and a maintenance office, a generator building, a warehouse storage, an accountant and re-entry office, and a wellness building only for staff. 151 cameras are located throughout the facility along with mirrors to assist in the monitoring of inmates. One post is

dedicated to monitoring the cameras and video footage can be retained for 10-14 days.

The programming at SCI-Quehanna Boot Camp is structured in a way that does not leave much free time for an inmate. Both the Boot Camp and SIP programs structure the inmate's daily activities to include group programming, education, employment, and recreation. In the units, activities are done as a group in an open setting. Movement within the facility is also monitored and often done as a group. The inmates interact with staff professionally, respecting their authority and role. When inmates are allowed to move freely, they are monitored by the many cameras in use. The structure of programming and the open bay barracks style living units, make it easier to observe and monitor inmate activity.

Male and female inmates interact minimally with one another. In the school, chapel, and dining hall, inmates are in the same area but are required to maintain separation. Outside recreation is offered to all inmates, but it is scheduled, controlled, and monitored by staff ensuring male and female inmates do not interact with one another during this time.

Given the 4 – 6 month program structure at SCI-Quehanna Boot Camp, there is a lot of movement of inmates in and out of the facility. Additionally, inmates in the program have short sentences or tend to be nearing release from the institution setting. Because of this structure, it is more difficult for inappropriate relationships to develop and inmates are more apt to follow rules as they near release.

<b>AUDIT FINDINGS</b>	
<p><b>Summary of Audit Findings:</b></p> <p>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.</p> <p>Auditor Note: No standard should be found to be “Not Applicable” or “NA”. A compliance determination must be made for each standard.</p>	
<b>Number of standards exceeded:</b>	9
<b>Number of standards met:</b>	31
<b>Number of standards not met:</b>	0
<p><b>Not audited at the facility level:</b></p> <p>Audited at the agency-level, and not relevant to the facility-level audit because the facility has no independent responsibility for the operation of these standards.</p>	5
<p>After a review of documents, interviews of staff, inmates, and providers, along with the on-site visit, this auditor has determined the following for SCI-Quehanna Boot Camp:</p> <p>Number of standards exceeded: 9            Number of standards met: 31            Number of standards not met: 0            Number of standards not applicable: 5</p> <p>The following standards were exceeded: 115.11; 115.13; 115.15; 115.17; 115.18; 115.31; 115.33; 115.42; 115.64</p> <p>There are no corrective actions recommendations required for this audit.</p>	

## 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>SCI-Quehanna Boot Camp operates under Pennsylvania state policy DC-ADM 008 Prison Rape Elimination Act (PREA) effective September 22, 2016. This is a detailed and robust policy and procedure, following the federal standards outlined in 28 C.F.R. Part 115. The PREA Policy states in part, "The Department has zero tolerance for sexual abuse or sexual harassment of any individual under the supervision of the Department (28 C.F.R. §115.11[a]). Any one who engages in, fails to report, or knowingly condones sexual abuse or sexual harassment of an inmate shall be subject to disciplinary action, up to and including termination, and may be subject to criminal prosecution". Additionally, within the PREA policy "all aspects of operations work toward preventing, detecting and responding to such conduct".</p> <p>DC-ADM 008 PREA Procedures Manual, section 7 includes a detailed disciplinary policy for staff, contractors, volunteers, and inmates who have been found to engage in prohibited behaviors.</p> <p>Interviews with the Superintendent, PREA Compliance Manager (PCM), and other staff confirmed zero tolerance toward all forms of sexual abuse and harassment. Staff firmly believe in the safety of inmates and the PREA standards. Throughout the facility tour, evidence was readily available which supported the desire to ensure inmate safety, including PREA Posters which highlight zero tolerance, methods to report, and directions for staff who have knowledge or suspicion of a sexual abuse or harassment of inmates.</p> <p>DC-ADM 008 PREA Procedures Manual, section 2 outlines agency staff responsibilities in preventing and responding to sexual abuse and harassment of inmates, including the identification and definition of duties of the PREA Compliance Coordinator and PREA Compliance Manager, supervision and monitoring of inmates, specialized population, protective custody, facility and technology upgrade, and cross gender searches.</p> <p>Per DC-ADM 008 PREA Procedures Manual and organizational charts, SCI-Quehanna Boot Camp has a designated PREA Compliance Manager (PCM). The Corrections Classification and Program Manager at each facility has been designated this role and per policy is given sufficient time and authority to coordinate the facilities efforts to comply with the PREA Standards. The PCM reports directly to the Superintendent of SCI-Quehanna Boot Camp.</p> <p>The PCM acknowledges that the Superintendent supports PREA efforts and allows for time and authority to carry out PREA responsibilities. It is evident in interviews that the PREA standards have been fully embraced by staff and that any PREA concerns and inmate safety are a priority for staff.</p> <p>Evidence Reviewed:  DOC Mission Statement  DC-ADM 008 Policy  DC-ADM 008 Procedures Manual  Organization Chart</p>

	Position Description of Corrections Classification and Program Manager Interview with PREA Compliance Manager Interview with Superintendent Interview with random staff  Corrective Action: None
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<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>According to DC-ADM 008, PREA Procedures Manual Section 2, the Department will include in any new contract, the contracted agency's obligation to "adopt and comply with the PREA Standards and the Department's policies related to PREA Compliance. (8 C.F.R. §115.12 [a])". Additionally, the contracted agency will be subject to audit according to PREA Standards which includes an official PREA audit. Further, the Department will provide contract monitoring to ensure compliance with the PREA Standards with any new contract or contract renewal.</p> <p>SCI-Quehanna Boot Camp has not entered into any contract for the confinement of inmates since the last PREA Audit.</p> <p>Evidence Reviewed:          Pre-Audit questionnaire          DC ADM 008 PREA Manual</p> <p>Corrective Action: None</p>

115.13	<b>Supervision and monitoring</b>
	<p data-bbox="252 170 927 203"><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1481 528">DC-ADM 008 PREA Procedures Manual states "The Department shall ensure that each facility develops, documents, and makes its best efforts to comply on a regular basis with a staffing plan as found in Department policy 6.3.1., Section 15 that provides for adequate levels of staffing, and where applicable, video monitoring, to protect inmates against sexual abuse. (28 C.F.R. §115.13 [a])</p> <p data-bbox="252 539 1394 618">a. In calculating adequate staffing levels and determining the need for video monitoring, facilities shall take into consideration:</p> <ol data-bbox="252 629 1485 1133" style="list-style-type: none"> <li>(1) generally accepted detention and correctional practices;</li> <li>(2) any judicial findings of inadequacy;</li> <li>(3) any findings of inadequacy from Federal investigative agencies;</li> <li>(4) any findings of inadequacy from internal or external oversight bodies;</li> <li>(5) all components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated);</li> <li>(6) the composition of the inmate population;</li> <li>(7) the number and placement of supervisory staff;</li> <li>(8) facility programs occurring on a particular shift;</li> <li>(9) any applicable State or local laws, regulations, or standards;</li> <li>(10) the prevalence of substantiated and unsubstantiated incidents of sexual abuse; and</li> <li>(11) any other relevant factors."</li> </ol> <p data-bbox="252 1182 1465 1391">In interviewing staff, staffing levels for the institution are determined at the central office level. There is a mechanism in place to request additional staff. Institution staff review the physical layout, identifying potential blind spots or problem areas in which to assign additional staff to ensure inmate safety. Cameras and mirrors are utilized throughout the facility and staff regularly conduct rounds.</p> <p data-bbox="252 1440 1473 1603">SCI-Quehanna Boot Camp does not deviate from the staffing plan. Staff overtime is utilized to adjust for pre-planned and unplanned absences. SCI-Quehanna Boot Camp provided an example of a shift report dated 8/1/17 and 8/7/17 showing employee leaves and employee overtime.</p> <p data-bbox="252 1653 1481 1944">Policy 6.3.1 states an "in house" Corrections Officer Staffing Audit will be completed at least once each fiscal year and includes the PREA Compliance Manager. It further allows for the PREA Compliance Manager to provide input regarding any staffing concerns and issues and preparing a joint plan for review by the Central Office Staffing Audit Team. At the conclusion of the audit process, policy indicates the PREA Compliance Manager and the Central Office Staffing Team will meet to discuss concerns, questions, and/or suggestions of the PREA Compliance Manager.</p> <p data-bbox="252 1993 1474 2119">DC-ADM 008 PREA Procedures Manual, Section 2, 4. c. states "Whenever necessary but no less frequently than once a year, each facility shall assess, determine, and document whether adjustments are needed to: (28 C.F.R. §115.13 [c])</p> <ol data-bbox="252 2123 1445 2157" style="list-style-type: none"> <li>(1) the facility's deployment of video monitoring systems and other monitoring technologies;</li> </ol>

and (28C.F.R. §115.13[c][2])

(2) the resources the facility has available to commit to ensure adherence to the staffing plan. (28 C.F.R. §115.13[c])"

SCI-Quehanna Boot Camp provided the Position Worksheet dated 12/28/16 which was reviewed by the PREA Coordinator and ultimately the Department Secretary and provided the SCI-Quehanna Boot Camp Post Assignment Report dated 12/28/16.

According to the PCM, he is given authority to be involved in discussions and decision making on the PIDS and statewide Manpower, Survey, and Staffing Committees in which PREA safety needs are addressed as it relates to equipment such as mirrors and cameras. .

Per DC-ADM 008 PREA Procedures Manual, Section 2 h. directs the PCM to "Conduct and document unannounced rounds to identify and deter sexual abuse and sexual harassment in accordance with Department policy 6.3.1, 'Facility Security', Section 19 utilizing the PREA Administrative Tour Documentation Form. This Form shall be submitted with the Monthly PREA Report Form. (28 C.F.R. §115.13[d])"

Quahanna Boot Camp provided the 2017 confidential schedule of PREA rounds which cover all three shifts, 6 am to 2 pm, 2 pm to 10 pm, and 10 pm to 6 am conducted by supervisory staff. Additionally, a waiver is in place to allow for Lieutenants to also conduct PREA rounds. Lieutenants are trained and serve in the role of Shift Commander. Documentation was provided showing when, where, and who conducted a PREA administrative Tour which and noted areas of concern or needed follow-up.

Interviews with supervisory staff confirm unannounced PREA rounds are conducted by commissioned officers. These are completed in a manner which does not cause staff to alert other housing units of the rounds. These rounds are documented in a log book on each unit as well as the tour documentation form. The log book was viewed during the facility tour.

Evidence Reviewed:

Pre-Audit Questionnaire

Policy 6.3.1.

Policy ADM 008

Staffing worksheet 12/28/16

PIDS Committee Meeting Minutes 10/25/16

CCTV Post Camera Check 5/22/17

Executive Staff PREA Rounds

Shift Reports

PREA Rounds Waiver

PREA Administrative Tour Documentation Forms

Housing Unit Log Book

Interview with Superintendent

Interview with management staff

Interview with PCM

Facility tour

Corrective Action: None

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>DC-ADM 008 PREA Procedures Manual, Section 2, 8. Housing Youthful Inmates, c. states " Upon initial reception to the Department, youthful inmates shall enter into an expedited classification process as outlined in Department policy 11.2.1, 'Reception and Classification'.  (1) Male youthful inmates shall be transferred to SCI Pine Grove within 24 hours of reception by the Department.  (2) Female youthful inmates, under the age of 18, shall immediately be placed into the Youthful Inmate Unit at SCI Muncy."</p> <p>In policy, a "youthful inmate" is defined as any person under the age of 18 who is under adult court supervision and incarcerated or detained in a prison.</p> <p>The SCI-Quehanna Boot Camp PREA Compliance Manager confirmed that SCI-Quehanna Boot Camp does not house any inmate under the age of eighteen.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC ADM 008  Interview with PCM</p> <p>Corrective Action: None</p>

115.15	<b>Limits to cross-gender viewing and searches</b>
	<p data-bbox="248 168 925 201"><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p data-bbox="248 246 523 280"><b>Auditor Discussion</b></p> <p data-bbox="248 324 1484 616">DC-ADM 008 PREA Procedures Manual, Section 2 does not allow cross-gender strip searches or cross-gender pat down searches of female inmates except in exigent circumstances and states in 9.a, "Staff shall not conduct cross-gender searches except in exigent circumstances, in accordance with Department policy 6.3.1, Section 30. (28 C.F.R. §115.15[a]) and 9.c. states "No facility shall permit cross-gender searches of female inmates, absent of exigent circumstances. Facilities shall not restrict female inmates' access to regularly available programming or other out of cell opportunities".</p> <p data-bbox="248 660 1452 739">Female inmates reported that they are not restricted from activities because female staff are not available for pat searches.</p> <p data-bbox="248 795 1476 907">Should a cross gender strip search or cross-gender pat down search occur, per DC-ADM 008, all cross-gender strip searches and pat down searches shall be documented on the Cross-Gender Search Validation Form, with a copy being maintained by the Security Office.</p> <p data-bbox="248 963 1452 1041">Body cavity searches shall only be conducted when performed by a physician in accordance with Department policy 6.3.1, Section 30. (C.F.R. §115.15[a])</p> <p data-bbox="248 1097 1444 1299">In the past 12 months, there have not been any cross gender strip searches or visual body cavity searches. Ten cross gender pat down searches of female inmates have been conducted due to exigent circumstances. Ten Cross-Gender Search Validation Forms were provided to the auditors, showing 10 searches completed on the same date and time due to no female security staff on shift.</p> <p data-bbox="248 1355 1484 1646">Department policy 6.3.1, Section 30, F.2.a. specifically states, " Absent exigent circumstances, a female staff member shall search a female inmate. A male staff member shall search a male inmate. Transgender or intersex inmates shall be searched by the same gender staff member consistent with the gender of inmates housed at that facility. For Quehanna Boot Camps, searches will be completed by the same gender staff member, consistent with the gender of inmates housed at the sending facility". Per policy 6.3.1 Section 30, F.5.c. "only a physician may conduct an internal search or body cavity search of an inmate".</p> <p data-bbox="248 1702 1444 1814">A memo was sent to all staff as a reminder that as of August 20, 2015 the cross-gender pat down searches were prohibited absent exigent circumstances and that female inmates' access to regular programming would not be restricted based upon this policy.</p> <p data-bbox="248 1870 1484 2072">Staff who were interviewed acknowledged this policy and articulated the procedure to be used for cross-gender searches. If only a male security staff is available, the staff would search the female inmate with another staff present and in front of cameras. This search would then be documented. Staff interviews confirmed that this does not happen often, as there is usually a female security staff on shift. Female inmates also confirmed this procedure when interviewed.</p> <p data-bbox="248 2128 1436 2161">DC-ADM 008 PREA Procedures Manual provide inmates with the ability to shower, perform</p>

bodily functions, and change clothing without nonmedical staff of the opposite gender viewing them in person or remotely, except in exigent circumstances. Additionally, the policy directs staff of the opposite gender to announce their presence when entering a housing unit and further describes when and how this should occur. The policy states, "when the status quo of the gender supervision on a housing unit changes from exclusively same gender to mixed or cross-gender supervision, the opposite gender staff are required to verbally announce their arrival on the unit." The announcement can be done by the staff entering the unit, by the officer working the control desk via the intercom, or by a specific tone system utilized only for the purpose of announcing a member of the opposite gender. Quahanna Boot Camp PREA Policy DC-ADM 008-QUE states "a. staff of the opposite gender shall announce their presence when entering an inmate housing unit in accordance with PREA Standard §115.15[d]. Due to QUE having both male and female inmates, each housing unit has a sign on the front door designating which sex is housed in that unit". SCI-Quehanna Boot Camp staff verbally announce gender "on deck". For example, "male on deck" or "female on deck".

Inmates reported during their interviews that they are afforded privacy to shower, change clothing, and perform bodily functions without opposite gender, non-medical staff viewing them. The open bay barrack-style housing units are equipped with single stall curtained showers and single stall toilets which provide privacy, yet ensure inmate sexual safety. The bathrooms are located next to the officers' station in which the officer can look into the bathroom yet not view inmates directly. The other housing unit is not a common bathroom setup, but allows for toilets and showers in each room. The showers are located by the door and is equipped with a shower curtain ending several inches off of the floor.

All staff and inmates reported during the interviews that opposite gender staff announce their presence upon entering a housing unit. While touring the facility, the entrance to each housing unit had signage affixed to the door, alerting staff the gender of the housing unit and the requirement to announce according to PREA standards. During the tour, an announcement was done upon entering each housing unit, which elicited a unison response from inmates on the housing unit.

DC-ADM 008 PREA Procedure Manual and 6.3.1 Facility Security Policy strictly prohibits staff from physically examining a transgender or intersex inmate for the purpose of determining the inmate's genital status. In the past 12 months, no search for the purpose of determining an inmate's genital status has occurred. Interviews with staff confirm they are aware of this policy and adhere to it.

SCI-Quehanna Boot Camp has trained 100% of their staff how to conduct cross gender pat searches. This was confirmed by the PREA Compliance Manager and a copy of the training roster from October 2016 showing staff in attendance of Contraband and Searches In-Service Training. The lesson plan for Contraband and Searches was included which highlighted the training objectives "Perform a clothed search of an offender" and "Perform a clothed search of a transgender or intersex offender in accordance with the National PREA Standard §115.15". Staff were also trained how to communicate professionally and to treat offenders with respect. This training is in line with DC-ADM 008 Procedures Manual which states "Staff shall be trained in how to conduct cross-gender pat searches, and in searches of transgender and intersex inmates, in a professional and respectful manner and in the least intrusive manner possible."

Staff acknowledged being trained to conduct cross gender pat down searches and searches of transgender and intersex inmates.

Evidence Reviewed:

DC-ADM 008

DC-ADM 008-QUE

Policy 6.3.1

Cross Gender Search Validation Form

In Service Training Roster

Training Academy lesson

Interviews with inmates

Interviews with random staff

Interview with PCM

Tour of the facility

Corrective Action: None

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>DC-ADM 006, Reasonable Accommodations for Inmates with Disabilities Policy and Procedure Manual states, "An inmate who is diagnosed as having a qualified disability will receive accommodations so that he/she can properly communicate/participate in the Department's facilities". Each facility is required to ensure that local procedures are in place to accommodate inmates who are deaf and hard of hearing, visually impaired, or diagnosed with a mental or physical impairment.</p> <p>DC-ADM 008 PREA Procedures Manual references DC-ADM 006 and states " the Department shall ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the Department's efforts to prevent, detect, and respond to sexual abuse and sexual harassment." Additionally, "written material shall either be delivered in alternative formats that accommodate the inmate's disability or the information shall be delivered through alternative methods". Further the policy states "The Department shall take reasonable steps to ensure meaningful access to all aspects of the Department's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient, including steps to provide qualified interpreters. In policy and practice, it is the PCM's responsibility to ensure that only staff or qualified contractors provide translation for inmates.</p> <p>During the facility tour, PREA posters in both English and Spanish were visible. Additionally, PREA information given to inmates are also available in English and Spanish.</p> <p>DC-ADM 008 prohibits inmates from acting as an interpreter, inmate readers, or providing "other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter would compromise the inmate's safety, the performance of first response duties under PREA Standards 28 C.F.R §115.64 , or the investigation of the inmate's allegations (28 C.F.R. §115.16[c]). Justification for any use of an inmate interpreter shall be documented thoroughly".</p> <p>An email sent to the PREA Compliance Managers was provided during the pre-audit. This email described additional resources in which PREA information was translated to Braille, and two resources for language translation services.</p> <p>As evidence of this policy in practice, a memo was distributed to shift commanders, treatment staff, and psychology department on 7/7/17 from the PCM updating the multi-lingual list of staff and the over the phone interpreting line to be utilized for PREA related matters. Also submitted for audit, was the contract for over the phone interpretation which is valid from 9/1/14 to 6/30/18.</p> <p>This policy has been communicated with security staff as noted in interviews.</p> <p>During the past 12 months, an inmate interpreter was not needed or utilized. An inmate identified as limited English proficient was interviewed during the audit; however, he was not in need of translation services.</p>

Evidence Reviewed:

Pre-Audit Questionnaire

DC-ADM 008

DC-ADM 006

Proprio Contract

Multi Lingual list for PREA matters dated updated 7/7/17

Email communication from PREA Coordinator to PCMs

Interview with PCM

Interviews with random staff

Interview with inmate

Corrective Action: None

115.17	<b>Hiring and promotion decisions</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>4.1.1 Human Resources and Labor Relations Procedures Manual Section 41, A. 2.  "Consistent with the Public Law 108-79, 28 C.F.R. Part 115, the Prison Rape elimination Act (PREA), the Department shall not hire or promote anyone who:</p> <ul style="list-style-type: none"> <li>a. 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)</li> <li>b. has been convicted or civilly or administratively adjudicated for 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; and/or</li> <li>c. has been convicted of any offense under the following (or equivalent out of state offense): <ul style="list-style-type: none"> <li>(1) Title 18 PA C.S.A Chapter 31 - Sexual Offenses; or</li> <li>(2) Title 18 PA C.S.A Chapter 59 - Public Indecency,"</li> </ul> </li> </ul> <p>Section 41 of 4.1.1, "Also, consistent with the PREA, the Department will consider any incidents of sexual harassment in determining whether to hire or promote anyone".</p> <p>According to the facility Human Resource staff, the Department does consider past incidents of sexual abuse and harassment when making hiring decisions.</p> <p>Full background checks are completed on all applicants. According to 4.1.1 Human Resources and Labor Relations Procedures Manual Section 40, any candidate for hire with "prior employment in any type of prison, jail, lockup, community confinement facility, juvenile facility or other institution.....will be further investigated to ensure that the candidate has not been found to have any of the following: (28 C.F.R. §115.17[a][1], §115.217[c][2])</p> <ul style="list-style-type: none"> <li>(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); and (28 C.F.R. §115.17[a][1], §115.217[c][2])</li> <li>(2) has been convicted or civilly or administratively adjudicated for 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 (28 C.F.R. §115.17[a][2][3], §115.217[a][2][3])"</li> </ul> <p>Per policy, the Human Resource Offices are responsible for the PREA Consent to Release of Information Form and the PREA Current/Prior Employer Letter to the applicable Human Resource Office. During the pre-audit, both forms, as well as the Position Vacancy Interest Form and the Application for Employment were submitted. The Position Vacancy Interest Form and the Application for Employment includes PREA questions answered by the employee/perspective employee related to prior employment in a prison, jail, lockup, community confinement facility, juvenile facility or other institution and engaging in sexual abuse, convicted of having engaged in or attempted to engage in sexual activity in the community by force, or involved in any incident of sexual harassment. The Application for Employment includes an Oath and Signature section which includes the phrase "I understand that any material omission or provision of materially false information will be grounds for non-selection or discipline, up to and including termination of employment". Policy outlines the</p>

procedure for utilizing these forms.

Per local Human Resource staff, when applying for a position, the applicant is asked a series of PREA related questions. Criminal background checks are completed on all potential new hires, promotions, or transfers at the Central Office level and Central Office makes the determination if a candidate is approved for hire, taking into consideration prior incidents of sexual abuse or harassment.

Policy 1.1.4 Centralized Clearances Procedures Manual Section 4., addresses contractors, contractor's employees and/or subcontractors who have may have contact with inmates also be investigated to ensure that "the Department does not enlist the services of any person(s) 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); and (28 C.F.R. §115.17[a] [1] and/or

(2) has been convicted or civilly or administratively adjudicated for 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 (28 C.F.R. §115.17[a][2][3]) "

Per policy, the Department will also consider sexual harassment when considering to enlist the services of a contractor who may have contact with inmates. According to human resource staff, criminal background checks are completed on volunteers and contract staff through centralized clearance in the security office.

Per policy 1.1.4, criminal history checks will be completed on all contractors every two year. The facility Security Office "will maintain a copy of the Centralized Clearance Check Information Request Form, a copy of the PREA Current/Prior Employer Letter and a copy of the information provided from the previous employer for five years for all contractors who indicated they have worked in a prison, jail, lockup, community confinement facility, juvenile facility or other institution".

In the past 12 months, 16 new employees who may have contact with inmates have been hired. All completed a criminal background check. Additionally, six contracts were entered into in which all staff covered under the contract completed a criminal background check.

Per DC-ADM 008 PREA Policy and Procedures Manual, criminal background records checks completed for staff and contractors are maintained in the Centralized Clearances database for at least seven years, in accordance with Pennsylvania Office of Administration Agency Records Retention and Disposition Schedule.

According to 4.1.1, all employees are cross checked daily with the Justice Network (JNET) system to identify employees who have had negative contacts with law enforcement. JNET provides real time information and notification to the Department rendering background checks every five years unnecessary. Additionally, employees are required to report any negative contact with law enforcement no later than the employee's next scheduled work day to the supervisor, security, or designee. Procedures are in place when an employee is arrested for a felony and non work related criminal misconduct. Central Office maintains

oversight of this responsibility and informs local human resource office when incidents occur.

Evidence Reviewed:

Pre-Audit Questionnaire

DC-ADM 008 PREA Procedures Manual

Policy 4.1.1. Human Resources and Labor Relations Procedures Manual

Policy 1.1.4 Centralized Clearance Procedures Manual

Examples of Prior Employer Letter

Examples of Background check correspondence

Application for Employment

Position Vacancy Interest Form

Interview with Human Resource Staff

Corrective Action: None

115.18	<b>Upgrades to facilities and technologies</b>
	<p data-bbox="252 170 927 203"><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1398 445">DC-ADM 008 PREA Procedures Manual Section 2, 7.a. directs facilities to consider "the design, acquisition, expansion, or modification" of facilities on the Department's ability to protect inmates from sexual abuse.</p> <p data-bbox="252 499 1461 701">SCI-Quehanna Boot Camp is currently renovating a housing unit. In order to better protect inmates from sexual abuse, the toilet and shower area was moved closer to the officers' station. In July 2017, SCI-Quehanna Boot Camp underwent renovations in two housing units. Cameras were installed in group rooms, staff offices were equipped with windows for observation, and the shower area was remodeled to include privacy partitions.</p> <p data-bbox="252 754 1477 873">DC-ADM 008 PREA Procedures Manual Section 2, 7.b. directs facilities when installing or updating monitoring technology, consideration should be made on how such technology could enhance the Department's ability to protect inmates from sexual abuse.</p> <p data-bbox="252 927 1477 1088">Minutes of the PIDS Committee was submitted during the pre-audit. The use of cameras is a topic at each meeting. It is noted that camera video is recorded daily and reviewed by Security as needed. Additionally, PREA concerns are discussed to include areas that need additional camera coverage or mirrors to ensure safety.</p> <p data-bbox="252 1142 1477 1344">SCI-Quehanna Boot Camp currently has 152 cameras throughout the facility. According to the PCM, in considering camera placement, consideration was made for blind spots and areas that held the biggest potential to place inmates at risk. During the facility tour, cameras were viewed throughout the facility. Additionally, the control center camera monitoring and video retention was viewed and discussed.</p> <p data-bbox="252 1397 815 1771">Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Procedures Manual  PIDS Committee Meeting Minutes 10/25/16  CCTV Post Camera Check  Facility tour  Interview with Agency Head  Interview with Superintendent  Interview with PCM</p> <p data-bbox="252 1825 560 1859">Corrective Action: None</p>

115.21	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>DC-ADM 008 PREA Procedures Manual Section 5 states, "Every report, complaint, or allegation of sexual abuse and sexual harassment, including third party and anonymous reports, shall be investigated promptly, thoroughly, and objectively". SCI Quahanna Boot Camp is responsible for conducting administrative PREA investigations, whereas criminal investigations are completed by the Pennsylvania State Police. During the pre-audit, an MOU between the Pennsylvania State Police and Pennsylvania Department of Corrections dated February 16, 2017 was submitted for review. The MOU contains PREA language as it relates to criminal investigations.</p> <p>Per DC-ADM 008 PREA Procedures Manual, the Department is responsible for investigating allegations of sexual abuse by following a uniform evidence protocol. Although Security staff are responsible for collecting and preserving direct and circumstantial evidence, Instructions for PREA Evidence Retention are provided to all staff and were included in the pre-audit documentation.</p> <p>SCI-Quehanna Boot Camp does not house youthful inmates.</p> <p>Per DC-ADM 008 PREA Procedures Manual, alleged inmate victims of sexual abuse will receive emergency medical treatment and crisis intervention services without financial cost to the victim. The Department of Corrections has entered into an agreement dated 10/13/15 with Mount Nittany Medical Center. Mount Nittany Medical Center agrees to examine DOC inmate victims of sexual abuse within 96 hours of the alleged abuse and the examination will be completed by a certified sexual assault nurse examiner. In the past 12 months, SCI-Quehanna Boot Camp has not had any incidences requiring a forensic medical exam. According to Mt. Nittany Medical Center Emergency Room staff, they do provide SANE services for Pennsylvania DOC facilities, including SCI-Quehanna Boot Camp. The nursing staff are trained in SANE procedures and every shift has a SANE nurse available. It is practice at Mt. Nittany Medical Center that male nurses examine male inmates and female nurses examine female inmates. There is a procedure in place when inmates are victims of sexual abuse and in need of a medical examination.</p> <p>Per DC-ADM 0008 PREA Procedures Manual, inmates taken to a local hospital for a forensic examination should be afforded support services by a victim advocate. If the inmate discloses the alleged sexual assault outside of the 96 hour timeframe, the PREA Compliance Manager is responsible for arranging the victim advocate to meet with the inmate at the facility or by telephone. SCI-Quehanna Boot Camp has entered into an agreement with Passages, Inc. 2 effective March 23, 2015 to provide services to sexual assault victims at SCI-Quehanna Boot Camp. Services would include advocacy for and accompaniment to the hospital or other location for the forensic examination and through the court process. Every inmate has access to Passages, Inc. 2 however if services are not available, Psychology staff will meet with the inmate. In addition, all inmates are assigned a Treatment Specialist. According to the direct service provider at Passages, Inc. 2, advocacy services are available but have not been utilized in the past year.</p>

Evidence Reviewed:

Pre-Audit Questionnaire

DC-ADM 008 PREA Procedures Manual

MOU between DOC and Pennsylvania State Police

Letter of Agreement between Mount Nittany Medical Center and DOC

Letter of Agreement between Passages, Inc. 2 and DOC

Instructions for PREA Evidence Retention

Interviews with staff

Interview with Mt. Nittany Medical Center staff

Interview with Passages Inc. 2 staff

Corrective Action: None

115.22	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>DC-ADM 008 PREA Policy and Procedure Manual is available on the Pennsylvania Department of Corrections Website and is available to the general public. Additionally, PREA audit reports, PREA Annual Report, and a FAQ section are available as well.</p> <p>Per DC-ADM 008 PREA Procedures Manual, "Every report, complaint, or allegation of sexual abuse and sexual harassment, including third party and anonymous reports, shall be investigated promptly, thoroughly, and objectively". DC-ADM 008 addresses investigations completed internally as well as by outside law enforcement agencies. Specially trained staff are responsible for conducting internal administrative investigations while criminal investigations are referred to the Pennsylvania State Police. The MOU between Pennsylvania DOC and the Pennsylvania State Police was provided during the pre-audit and outlines the responsibilities of each party.</p> <p>Every report, complaint, or allegation of sexual abuse and/or sexual harassment is entered into the PREA Tracking System and updated throughout the investigative process. Interviews with staff confirmed that every report, complaint, or allegation is investigated.</p> <p>During the Pre-Audit, it was reported that no allegations of sexual abuse were received in the past 12 months and for the purpose of the audit, documentation from a PREA Administrative Investigation, just outside the 12 month period, was included. The report documented the Administrative Investigation step by step as well as the outcome of the investigation. Just prior to the site visit, two allegations of sexual harassment were reported and administratively investigated.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Procedures  Pennsylvania DOC website  Administrative investigation files  Interviews with inmates  Interviews with staff</p> <p>Corrective Action: None</p>

115.31	<b>Employee training</b>
	<p data-bbox="252 170 927 203"><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1430 360">Per Policy DC-ADM 008 PREA Procedures Manual, "1. Employee Training (Basic Training)</p> <p data-bbox="252 371 1453 488">a. The PCM, in conjunction with the Training Coordinator at each facility, shall ensure that all employees who have contact with inmates receive the following training (28 C.F.R. §115.31 [a])</p> <ol data-bbox="252 499 1485 1346" style="list-style-type: none"> <li data-bbox="252 499 1342 577">(1) the zero tolerance policy against sexual abuse and sexual harassment within the Department; (28 C.F.R. §115.31 [a][1])</li> <li data-bbox="252 589 1485 705">(2) how staff are to fulfill their responsibilities under the Department's sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures as defined in this policy; (28 C.F.R. §115.31 [a][2])</li> <li data-bbox="252 716 1477 795">(3) inmates' right to be free from sexual abuse and sexual harassment; (28 C.F.R. §115.31 [a][3])</li> <li data-bbox="252 806 1445 884">(4) the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; (28 C.F.R. §115.31 [a][4])</li> <li data-bbox="252 896 1461 974">(5) the dynamics of sexual abuse and sexual harassment in confinement; (28 C.F.R. §115.31 [a][5])</li> <li data-bbox="252 985 1477 1064">(6) the common reactions of sexual abuse and sexual harassment victims; (28 C.F.R. §115.31 [a][6])</li> <li data-bbox="252 1075 1414 1153">(7) how to detect and respond to signs of threatened and actual sexual abuse; (28 C.F.R. §115.31 [a][7])</li> <li data-bbox="252 1164 1334 1198">(8) how to avoid inappropriate relationships with inmates; (28 C.F.R. §115.31 [a][8])</li> <li data-bbox="252 1209 1485 1288">(9) how to communicate effectively and professionally with inmates, including LGBTI or gender nonconforming inmates; and (28 C.F.R. §115.31 [a][9])</li> <li data-bbox="252 1299 1398 1346">(10) how to comply with relevant laws of Pennsylvania related to mandatory reporting of sexual abuse to outside authorities. (28 C.F.R. §115.31 [a][10])"</li> </ol> <p data-bbox="252 1402 1485 1648">During the pre-audit, the lesson plan and corresponding power point slides utilized in the basic training was submitted for review. Both follow PREA policy as well as the PREA standards. Additionally, participants are provided with a Basic Training Participant Guide as a learning tool utilized during training. Further, the New Employee Orientation agenda was submitted which includes the PREA training by the facility PCM. The interview with the PCM verified his role in training facility staff.</p> <p data-bbox="252 1704 1485 1951">Per DC-ADM 008, all staff are required to receive training tailored to the gender of the inmates at the assigned facility. If staff are reassigned from a facility that houses single gender inmates to a facility that houses the opposite gender, those staff will receive additional gender specific training. At SCI-Quehanna Boot Camp, all staff are required to attend "Women Offenders in Pennsylvania Corrections (WOPAC), Gender Expectations". This training acknowledges the special management issues working with female offenders.</p> <p data-bbox="252 2007 1461 2163">During the Pre-Audit, the following was submitted and reviewed: Women Offenders in Pennsylvania Corrections, Gender Expectations training information, transfer appointment letters, and training records. Staff identified by the transfer appointment letters completed the Gender Expectations training.</p>

Per DC-ADM 008 PREA Procedure Manual, "Section 2 - Sexual Abuse/Sexual Harassment Prevention and Training

E. Training

1. Employee Training (Basic Training)

b. Newly hired staff member shall receive this training as part of basic training at the Training Academy.

c. Beginning in 2016, and every even numbered year thereafter, the annual PREA education shall be provided in the form of a refresher of the initial basic staff training information for all staff members.

d. Beginning in 2017 and every odd numbered year thereafter, the annual PREA education shall be provided in the form of an update to this procedures manual for all staff members."

Training at SCI-Quehanna Boot Camp during odd number years consists of Computer Based Training and in even numbered years, full training is offered.

Following PREA training, staff are required to sign the PREA Training and Understanding Verification Form to acknowledge receipt and understanding of the PREA training. This is consistent with DC-ADM 008 PREA Procedures Manual which requires staff to verify they have received the information and understand the included items utilizing the PREA Training and Understanding Verification form. Examples of completed Training and Understanding Verification Forms were reviewed.

All staff interviewed reported having been trained in PREA. New security staff are trained at the Academy and then receive additional training at the facility. Most staff noted the annual training requirement. Training consists of both in person and on line.

Evidence Reviewed:

Pre-Audit Questionnaire

DC-ADM 008 PREA Procedures Manual

New Employee Orientation

Employee training records

Course Lesson plan cover sheet

PREA Basic Training Participant Guide

Training and Understanding Verification Form examples

PREA Power Point

Women Offenders In Corrections, Gender Expectations (WOPAC) training information

Transfer appointment letters

Training records for transfer staff completing WOPAC

PREA Policy Update 2017 training record

Interview with random staff

Interview with PCM

Corrective Action: None

115.32	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>According to DC-ADM 008 PREA Procedure Manual, "Section 2 - Sexual Abuse/Sexual Harassment Prevention and Training</p> <p>E. Training</p> <p>2. Specialized Staff Training</p> <p>c. Contractors and Volunteers</p> <p>(1) Contractors and volunteers (to include contract service providers, public visitors, or Non-Department Employees) shall receive training on their responsibilities under the Department's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. They shall be trained during orientation sessions and annual training reflective of the level of contact that they have with inmates. (28 C.F.R. §115.32[a])"</p> <p>The PREA Procedure also identifies three levels of training requirements for contractors and volunteers based on the amount of contact the contractor or volunteer would have with inmates. "Contractors/Volunteers PREA Training" includes the policy statement, zero tolerance, and what that means.</p> <p>Upon completion of the training, contractors and volunteers retain a copy of the training. Further, they are required to sign and acknowledge the PREA Training and Understanding Verification of the PREA training, which follows DC-ADM 008 E.2.c.2. The PREA Training and Understanding Verification acknowledgement sections states, " I understand that the Department of Corrections maintains a zero tolerance policy in regard to inmate sexual abuse, sexual harassment and retaliation." Several forms were provided during the pre-audit, completed by contractors and volunteers at the various training levels.</p> <p>Interview of a contract provider confirmed PREA training in the classroom and via computer. Training consisted of zero tolerance policy and how to report such incidents should a provider become aware of an incident.</p> <p>Evidence Reviewed:</p> <p>Pre-Audit Questionnaire</p> <p>Contractors/Volunteers PREA Training</p> <p>PREA Training and Understanding Verification Form for Classroom Training. Example from a Volunteer completed training.</p> <p>DC-ADM 008 PREA Procedures Manual</p> <p>Interview with contract provider</p> <p>Interview with volunteer coordinator</p> <p>Corrective Action: None</p>

115.33	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>DC-ADM 008 PREA Procedures Manual, Section 2 addresses inmate education and requires "Each facility to provide inmate education explaining the zero tolerance policy regarding sexual abuse and sexual harassment, and how to report incidents or suspicions of sexual abuse, sexual harassment or retaliation, and what to do if he/she is the victim of such. This information shall be provided in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled as well as to inmates who have limited reading skills. (28C.F.R. §115.33[d]) Additionally, DC-ADM 008 PREA Procedures Manual states, "any inmate transferred must receive education upon transfer, only to the extent that the policies and procedures of the inmate's new facility differs from those of the previous facility" (28C.F.R. §11533[c])</p> <p>According to policy and supported in practice, during the intake process in Property, inmates receive PREA training information and are given a copy of the Sexual Assault Awareness Information Handout. A copy was provided during the pre-audit. The handout defines PREA, zero tolerance, what to do if become a victim and how to report. The handout is available in English and in Spanish and translation services are available for other languages. Over the past 12 months, 100% of all new inmates received this education at intake. Within 30 days of reception, per policy, inmates are shown "The National PREA Resource Center Inmate Education : What you Need to Know" video regarding the inmate's rights to be free from sexual abuse, harassment, and retaliation, and Department policies and procedures for responding to such incidents. At SCI-Quehanna Boot Camp, the video is shown weekly, resulting in inmates receiving this training within seven days of intake. Staff are present during the video and will pause the video to discuss the content. Content of the video includes zero tolerance, reporting options, and undressing in proper areas. The video is available in Spanish and English and has subtitles. Accommodations are made for inmates who are deaf and hard of hearing, visually impaired, and those diagnosed with a mental or physical limitation. This practice was confirmed through interviews with staff and inmates.</p> <p>Upon completion of PREA education, inmates, are required to sign an acknowledgement that they received and understand PREA. Inmates also are required to sign and acknowledge the various components of orientation which occurs within the first week of arrival at Quahanna Boot Camp and includes "Sexual Abuse/Assault Training". Additionally, DOC staff document training activities for each inmate in their adjustment records. Several of the verification forms and adjustment records were submitted during the pre-audit, which confirms the training and documentation occur.</p> <p>In addition to training, inmates are provided an inmate handbook which defines PREA, the Zero Tolerance Policy, methods of reporting, and available support services. Posters in English and Spanish are hung around the facility, evidenced during the facility tour, and twice a month public service announcements regarding PREA are broadcast throughout the institution.</p> <p>All of the inmates interviewed acknowledged receiving PREA education upon arrival to SCI-</p>

Quehanna Boot Camp prior to being placed on a housing unit and once on the housing unit. Inmates were provided rules against sexual abuse and harassment and their rights to sexual safety, how to report, and their right not to be punished for reporting.

Evidence Reviewed:

Pre-Audit Questionnaire

DC-ADM 008 PREA Procedures Manual

DC-ADM 006 Reasonable Accommodations for Inmates with Disabilities

PREA education handout to inmates in English and Spanish

Intake Mental Health Screening questionnaire including PREA

Cumulative Adjustment Records for transfer in of inmates indicating completed PREA education

PREA Inmate Education Verification Form, completed examples

PREA: What You Need To Know Facilitator's Guide

Acknowledgement of Orientation, completed examples

Email form PREA Coordinator to PCMs indicating Braille and translation services available

Reports indicating inmate transfers to SCI-Quehanna Boot Camp and education documentation

PREA Posters, English and Spanish

Inmate acknowledgement having received the DOC Inmate Handbook

DOC Inmate Handbook, PREA specific language

PREA Public Service Announcement Tracking

Facility Tour

Interviews with inmates

Interviews with random and target staff

Corrective Action: None

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>According to DC-ADM 008 PREA Procedure Manual Section 2 - Sexual Abuse/Sexual Harassment Prevention and Training, Specialized Staff Training - Staff designated to conduct sexual abuse investigations receive specialized training which includes, but is not limited to, "interviewing, sexual abuse victims, proper use of Miranda warnings, the Garrity rule, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecutorial referral (28 C.F.R. §115.32[b])". Per policy, the training is developed and standardized by the PREA Compliance Director and occurs on an annual basis. Staff are required to acknowledge that they received the training by signing the PREA Training and Understanding Verification Form. A completed example of the form was submitted and reviewed during the pre-audit.</p> <p>Quahanna Boot Camp has four staff who have completed this training.</p> <p>Training records were reviewed for the lead PREA investigator. He was trained in 2016 through the DOC Academy. Training consisted of procedural requirements, legal issues and criminal prosecution, preservation of evidence, and interviewing.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Procedures Manual  Training Certificate  PREA Training and Understanding Verification Form  Interviews with investigatory staff</p> <p>Corrective Action: None</p>

115.35	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>According to DC-ADM 008 PREA Procedures Manual, medical and mental health services staff receive additional training working with victims of sexual abuse and sexual harassment. Per policy, "This specialized training shall include, but is not limited to: how to detect and assess signs of sexual abuse and sexual harassment, how to preserve physical evidence of sexual abuse, how to respond effectively and professionally to victims of sexual abuse and sexual harassment, and how and to whom to report allegations or suspicion of sexual abuse and sexual harassment. (28 C.F.R. §115.35[a][1][2][3][4])." This training is developed by the PREA Compliance Director and standardized for Department wide training. This training occurs within six months of employment. Upon completion of the training, staff are required to sign an acknowledgement that they have received and understand the training utilizing the PREA Training and Understanding Verification Form and kept in the employee's training file.</p> <p>The Specialized Training for Medical and Mental Health Care Standards power point slides were included in the pre-audit, confirming that training encompasses policy standards.</p> <p>Twelve medical/mental health staff at SCI-Quehanna Boot Camp have completed this training. This is 100% of the medical and mental health staff assigned to SCI-Quehanna Boot Camp.</p> <p>Medical/Mental Health Staff interviewed did acknowledge receiving annual specialized PREA training. Training consisted on how to detect and assess signs of sexual abuse and sexual harassment, preservation of physical evidence, responding effectively and professionally to victims, and how to report allegations or suspicions of sexual abuse and sexual harassment.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008  Memo regarding PREA Training for Medical and Mental Health Care  PREA Training for Medical and Mental Health Care power point  Training Records  Interviews with medical staff  Interview with PCM</p> <p>Corrective Action: None</p>

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 1485 741">Per DC-ADM 008 PREA Procedures Manual Section 2 B.1. "All inmates shall be assessed during the intake screening process, upon receipt into another facility, whenever an inmate is involved in an incident of sexual abuse and at his/her annual review for risk of being sexually abused by other inmates or sexually abusive toward other inmates. (28 C.F.R. §115.41[a])." The initial assessment is conducted within 72 hours of reception and is conducted by medical or mental health staff. The initial assessment "consider prior acts of abuse, prior convictions for violent offenses, and history of prior facility violence or sexual abuse, as known to the Department , in order to assess inmates or the risk of being sexually abusive. (28 C.F.R. §115.41[b][e])." A reassessment is completed between day 20 and 30 of every inmate's arrival to SCI-Quehanna Boot Camp.</p> <p data-bbox="248 797 1453 958">In the past 12 months, 1268 inmates went through the intake process at Quahanna Boot Camp. 100% of the new inmates admitted completed the initial PREA risk assessment. 1150 inmates, or 100% of inmates who remained at the institution for 30 days or longer, were reassessed.</p> <p data-bbox="248 1014 1445 1176">Pennsylvania Department of Corrections utilizes the PREA Risk Assessment Tool (PRAT). According to the provided PRAT User Guide, the PRAT is an "objective means of identifying an inmate's relative risk of becoming a victim of sexual abuse and/or abuser in the prison setting with the goal of addressing the safety concerns of vulnerable populations."</p> <p data-bbox="248 1232 1050 1267">Per DC-ADM 008, the assessment uses the following criteria:</p> <ul data-bbox="248 1272 1469 1731" style="list-style-type: none"> <li>a. whether the inmate has a mental, physical, or developmental disability</li> <li>b. the age of the inmate</li> <li>c. the physical build of the inmate</li> <li>d. whether the inmate has previously been incarcerated</li> <li>e. whether the inmates' criminal history is exclusively nonviolent</li> <li>f. whether the inmate has prior convictions for sex offenses against a child or an adult</li> <li>g. whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming</li> <li>h. whether the inmate has previously experienced sexual victimization</li> <li>i. the inmate's own perception of vulnerability</li> <li>j. whether the inmate is detained solely for civil immigration purposes</li> </ul> <p data-bbox="248 1787 1469 1861">In viewing the PRAT, this PREA risk assessment tool encompasses all of the criteria as stated in policy.</p> <p data-bbox="248 1917 1469 2119">Per DC-ADM 008, an inmate's risk level will be reassessed by the PCM, using the PRAT, "when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of victimization or abusiveness. (28 C.F.R. §115.41[g])". Inmates will not be disciplined for refusing to answer a question or not disclosing complete information.</p>

According to the intake staff, inmates are assessed with the PRAT. The PRAT is an on line tool and administered by the nurse at during intake, prior to the inmate being assigned to the housing unit, within hours of arriving to SCI-Quehanna Boot Camp. Inmates are then reassessed on the unit by the counselor within 30 days of intake. All of the inmates who were interviewed acknowledged being asked a number of questions upon arrival to the institution and the inmates who had been at the facility over thirty days acknowledged being reassessed.

The information collected while administering the PRAT and the specific scores remain confidential. The PRAT is only printed for audit purposes and is then shred. High risk status is entered into the Unit Management System under Security Concerns. The information learned from PRAT is utilized, but is done so discreetly and only to staff who need to know for safety and security reasons. This was confirmed by talking to several facility staff.

Evidence Reviewed:

Pre-Audit Questionnaire

DC-ADM 008 PREA Procedures Manual

Completed PRAT example

Interview with inmates

Interview with staff

Facility Tour

Corrective Action: None

115.42	<b>Use of screening information</b>
	<p data-bbox="252 170 927 203"><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1474 958">Per DC-ADM 008 PREA Procedures Manual, "Information received through the administration of the PRAT questions shall be used 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 sexual abusive (28 C.F.R. §115.42[a])" According to a memo sent to Superintendents in February 2015, the information obtained from the PRAT will be used to determine appropriate housing, bed, program, education and employment placement. The information from the PRAT will be incorporated into the Unit Management System and will indicate if there are housing concerns, but will not identify the specific concern. Per policy, the safety of each inmate is determined individually. When assigning housing or programming, the PRAT scores are taken into consideration and staff are notified as needed to ensure safety of inmates. Steps are taken to limit the risk of victimization while still ensuring inmates receive programming. The PCM and specialized staff confirmed the use of PRAT scores to ensure sexual safety but that the information is provided only to staff who are in need of the information and the PRAT is not printed, except for audit and then it is shred.</p> <p data-bbox="252 1010 1474 1216">Per DC-ADM 008, "in deciding whether to assign a transgender or intersex inmate to a facility that is consistent with his/her gender identity, and in making other housing and programming assignments, the Department shall consider, on a case-by-case basis, whether a placement would ensure the health and safety of all impacted inmates and whether the placement could potentially present management or security problems. (28 C.F.R §115.42[c]."</p> <p data-bbox="252 1267 1474 1899">According to policy, when an inmate identifies as transgender or intersex, the inmate will meet with the PREA Compliance Manager within 5 business days to complete the Gender Review Committee (GRC) Checklist. The inmate is reassessed every six months thereafter. After the inmate meets with the PCM, the inmate will meet with the GRC which consists of the PCM, medical and mental health professionals, the Deputy Superintendent of Centralized Services, and the Deputy Superintendent of Facility Management to make housing and programming assignments while ensuring the inmate's safety. Per policy, the "participants (of the GRC) shall listen attentively to the inmate's responses". According to the PCM, he meets with transgender inmates and reviews the GRC Checklist. They review options and develop a plan to ensure sexual safety of the inmate, taking into account the inmate's own views in regards to their own safety. The GRC is convened allowing the inmate to decide whether or not to attend. Inmates at SCI-Quehanna Boot Camp complete programming within six months of admission, therefore, the six month review does not occur. During the interview with auditors, a transgender inmate's account mirrored that of the PCM's account. Further, the inmate believed treatment by facility staff was more than fair.</p> <p data-bbox="252 1951 1474 2157">SCI-Quehanna Boot Camp is designed to allow all inmates to shower separately. However, transgender inmates are given the option to shower at a separate time from other inmates. Additionally, there are no designated housing areas for transgender or intersex inmates. Bed assignments are determined based on inmate's own safety views in relation to cameras, mirrors, and officers' station.</p>

Evidence Reviewed:

PREA-Audit Questionnaire

DC-ADM 008 PREA Procedures Manual

Memo from Executive Deputy Secretary to Superintendents

Gender Review Committee Checklist Example

Interviews with staff

Interview with PCM

Interview with inmates

Facility tour

Corrective Action: None

115.43	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Per DC-ADM 008 PREA Procedure, "Inmates at a high risk for sexual victimization or inmates who have allegedly suffered sexual abuse shall not be placed involuntarily in Administrative Custody (AC) as a means of protection unless an assessment of all available alternatives has been made by Psychology and Security staff in conjunction with the Facility Manager/designee and a determination has been made that there is no other available alternative means of separation from likely abusers. If the facility cannot conduct the assessment immediately, the facility may hold the inmate in involuntary AC for less than 24 hours while completing the assessment. (28 C.F.R. §115.42[a])(28 C.F.R. §115.68)."</p> <p>SCI-Quehanna Boot Camp, does not place any inmate involuntarily into Administrative Custody as a means of protection or for any other reason. If an inmate is in need of Administrative Custody at SCI-Quehanna Boot Camp because of current behavior, male inmates are transferred to SCI-Houtzdale and female inmates are transferred to SCI-Muncy. While pending transport, inmates can be held in a single holding cell for a period of less than 24 hours.</p> <p>Inmates who are at high risk for sexual victimization are monitored closely and bed assignments are made considering other inmates' risk level, proximity to cameras, and officer stations. This was confirmed during the facility tour and interviewing staff.</p> <p>Because SCI-Quehanna Boot Camp does not place inmates in segregated housing, there were no inmates in segregated housing to interview.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Manual  interview of staff  Facility tour</p> <p>Corrective Action: None</p>

115.51	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>DC-ADM 008 PREA Procedures Manual "Section 3 - Reporting Sexual Abuse and Sexual Harassment</p> <p>B. Methods of Reporting for inmates</p> <p>1. An inmate who is an alleged victim of any of the following shall report the abuse to a staff member as soon a possible:</p> <ul style="list-style-type: none"> <li>a. sexual abuse</li> <li>b. sexual harassment;</li> <li>c. retaliation by other inmates or staff for reporting sexual abuse and sexual harassment; and/or</li> <li>d. staff neglect or violation of responsibilities that may have contributed to such incidents. (28 C.F.R. §115.51[a])</li> </ul> <p>2. A report may be made to any staff member in the facility including, but not limited to, medical staff, Psychology staff, Corrections Officers, and Counselors. (28 C.F.R. §115.51[c])</p> <p>3. Methods of reporting include the following: (28 C.F.R. §115.51[a])</p> <ul style="list-style-type: none"> <li>a. verbal report to a staff member;</li> <li>b. submitting a DC-135A, Inmate Request to Staff Member; and/or</li> <li>c. submitting a written report to the Sexual Abuse Reporting Address: BIC/PREA Coordinator, 1800 Elmerton Avenue Harrisburg, PA, 17110.</li> </ul> <p>4. As soon as a staff member, contractor, or volunteer receives a report of sexual abuse or sexual harassment, either verbally or in writing, he/she is required to notify the Shift Commander immediately. They required process for making this report is outlined in Subsection C. below. (28 C.F.R. §115.51[c])</p> <p>5. These written reports may be submitted, either as identified above, or through the facility grievance lock-boxes located on every housing unit within the facility."</p> <p>During the pre-audit, a PREA poster was submitted, which outlined four methods to report a PREA complaint including verbal or written report to any staff member, the submission of the 135A, Inmate Request to Staff, a written report to the BCI/PREA Coordinator in Harrisburg PA, and the Pennsylvania Coalition Against Rape in Enola, PA. The poster also includes methods for staff, contractors, and volunteers to report incidents of PREA. These methods include verbal reports to the Security Captain or Shift Commander, a written incident/Extraordinary Occurrence report, and to the BCI/PREA Coordinator in Harrisburg, PA.</p> <p>During the facility tour, PREA posters in both English and Spanish were visible in all of the housing units and various other areas of the facility, such as the chapel and medical. Additionally, grievance lock-boxes were located on each of the housing units.</p> <p>Most of the inmates interviewed could name more than one way to report sexual abuse or harassment, including talking to or writing to any staff at the facility and writing to the Pennsylvania State Police. Staff interviewed all report more than one way an inmate could report sexual abuse or sexual harassment and how that could occur privately. When staff receive allegations or have suspicions of sexual abuse or sexual harassment, they indicated they report it immediately to the shift commander and document in an incident report.</p>

Per policy, Pennsylvania Department of Corrections does not accept or house inmates detained solely for civil immigration purposes.

Evidence Reviewed:

Pre-Audit Questionnaire

DC-ADM 008 PREA Procedures Manual

11.5.1 Records Office Operations Policy and Manual

Employee Report of Incident and subsequent Investigative Summary - examples

Inmate Grievance and Grievance Rejection with subsequent Investigative Summary - examples

PREA Poster

Facility Tour

Interview with inmates

Interview with staff

Corrective Action: None

115.52	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>SCI-Quehanna Boot Camp is exempt from this standard as sexual abuse and sexual harassment complaints are not addressed through the grievance process.</p> <p>Per DC-ADM 008 PREA Procedures Manual Section 3 - Reporting Sexual Abuse and Sexual Harassment</p> <p>"B. Methods of Reporting for Inmates</p> <p>6. Inmates shall not utilize the inmate grievance system to report sexual abuse or sexual harassment by a staff member or inmate-on-inmate sexual abuse, as defined in the Glossary of Terms for this procedures manual. However, if an inmate files a grievance related to staff on inmate sexual abuse/sexual harassment or inmate-on-inmate sexual abuse, the Facility Grievance Coordinator shall reject the grievance and forward it to the facility Security Office and the PREA Compliance Manager (PCM)/designee for tracking and investigation. The inmate shall be notified of this actions."</p> <p>When an inmate uses the grievance system to report sexual abuse or sexual harassment, the grievance is rejected and the information is sent to the facility Security Office to begin the PREA investigation. Examples of this and the Investigative Summary were included in the Pre-Audit Questionnaire showing the grievance was rejected, yet the allegations were fully investigated.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Procedure Manual  Inmate Grievance, Rejection, and Investigative Summary - example</p> <p>Corrective Action: None</p>

115.53	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Per DC-ADM 008 PREA Procedures Manual "Section 4 - Responding to Report of Sexual Abuse</p> <p>E. Inmate Access to Outside Supportive Services</p> <ol style="list-style-type: none"> <li>1. The Department works in collaboration with the Pennsylvania Coalition Against Rape (PCAR) and its member centers. The facility PCM, in conjunction with the statewide PREA Coordinator/designee has worked to establish mutual agreements with local rape crisis centers where all Department facilities are located. (28 C.F.R. §115.53[c])</li> <li>2. The PCM shall ensure that inmates are offered and provided with access to outside victim advocates for emotional supportive services related to sexual abuse which has occurred in a confinement setting. During non-working hours, the Shift Commander shall be responsible to ensure the aforementioned support services. Supportive services may be provided via a variety of methods including in person, during a non-monitored phone call and/or in writing. The preferred service delivery method is in person in a confidential setting. (28 C.F.R. §115.53[c])</li> <li>3. The PCM shall inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws. (28 C.F.R. §115.53[b])"</li> </ol> <p>The Pennsylvania Department of Corrections and Passages, Inc. 2 entered into an agreement on March 23, 2015 outlining the responsibility of SCI-Quehanna Boot Camp and Passages, Inc. 2 when an alleged sexual assault occurs at SCI-Quehanna Boot Camp. This includes providing "confidential supportive services to the victim either by telephone, mail, or in person". A copy of the agreement was submitted during the pre-audit.</p> <p>Inmates are provided PCAR and Passages, Inc. 2 brochures which provides contact information for both agencies. The Passages, Inc. 2 brochure includes available services and notes that services are free and confidential. At intake, inmates are also provided PREA information in writing, which is one page in length and includes the definition of sexual abuse and sexual harassment, and what to do and how to report sexual abuse and sexual harassment. This includes contact information for PCAR. The PREA poster outlines various methods of reporting and includes contact information for PCAR. It is written in both English and Spanish.</p> <p>When inmates are offered outside support services, they are provided an acknowledgment form which states "Passages can provide confidential support. Passages will only share information with us if there is a risk to you, another person, or the facility". Inmates utilize this form to accept or refuse services and sign in acknowledgement. Additionally, prior to receiving support services, inmates sign consent forms which also outline confidentiality and when information can be disclosed. Several of each completed form was included during the pre-audit. Further, Passages, Inc. 2 also requests inmates sign releases of information.</p> <p>Most of the inmates interviewed did not report sexual abuse at SCI-Quehanna Boot Camp and therefore were not cognizant of outside resources. When asked about support services</p>

inmates knew that counselors at SCI-Quehanna Boot Camp would be available to help. Most inmates reported being aware of outside support groups, but only a few identified Passages as that support.

According to the PCM, Passages, Inc. 2 provides support to inmates at SCI-Quehanna Boot Camp for anyone wishing to address prior sexual victimization.

An interview with the direct service provider from Passages, Inc 2, confirmed that support groups are provided to female inmates at SCI-Quehanna Boot Camp and that individual therapy is provided to male inmates. Groups are open ended to allow for the movement of inmates through the facility and to offer support when an inmate is ready for programming. Inmates sign releases of information for both SCI-Quehanna Boot Camp and Passages, Inc 2. Advocacy services are also available if an inmate wishes to work with an advocate.

SCI-Quehanna Boot Camp does not house persons detained solely for civil immigration purposes.

Evidence Reviewed:

Pre-Audit Questionnaire

DC-ADM 008 PREA Procedures Manual

DC-ADM 008 QUE PREA Procedures Manual

PCAR Poster

Passages pamphlet

PREA Poster

PREA inmate handout

Call Out Sheet for Passages support group

Consent forms for Passages

MOU between Pennsylvania DOC and Passages, Inc. 2

Interview with inmates

Interview with PCM

Interview with Direct Service Provider from Passages, Inc. 2

Corrective Action: None

<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Per DC-ADM PREA Procedures Manual, "Section 3 - Reporting Sexual Abuse and Sexual Harassment</p> <p>D. Methods of Reporting for Friends, Family, and the General Public</p> <p>1. The Sexual Abuse Reporting Address is an option for the general public to report an allegation of sexual contact. The reporting address is: BCI/PREA Coordinator, 1800 Elmerton Avenue, Harrisburg, PA 17110.</p> <p>2. A writer may choose to include his/her name and contact information, but it is not necessary in making a report; complaints can be made anonymously (28 C.F.R. §115.54)."</p> <p>Instructions on how to make a report is located on the Pennsylvania DOC website under Prison Rape Elimination Act (PREA) &gt; Make a Sexual Assault/Harassment Report. This page was last updated January 12, 2017.</p> <p>Additionally, how to report information is also posted in English and Spanish on the doors to the visiting area and on a bulletin board in the visiting area of SCI-Quehanna Boot Camp.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  Pennsylvania DOC website  Interview with staff  Facility Tour</p> <p>Corrective Action: None</p>

115.61	<b>Staff and agency reporting duties</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Per DC-ADM 008 PREA Procedures Manual "Section 3 - Reporting Sexual Abuse and Sexual Harassment</p> <p>C. Methods of Reporting for Staff, Contractors and Volunteers</p> <p>1. Any staff member, contract service provider, and volunteer shall immediately report to the Shift Commander if he/she has knowledge, suspicion, or information regarding any of the following:</p> <ul style="list-style-type: none"> <li>a. sexual abuse of an inmate;</li> <li>b. sexual harassment of an inmate that occurred in a facility;</li> <li>c. retaliation against inmates or staff who reported such an incident; and/or</li> <li>d. staff neglect or violation of responsibilities that may have contributed to an incident or retaliation."</li> </ul> <p>Policy also states in 4 under Methods of Reporting for Staff, Contractors, and Volunteers, " Apart from reporting to designated supervisor, or officials, staff shall not reveal any information related to a sexual abuse allegation to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions, where sexual abuse with an inmate is reported. (28 C.F.R. §115.61[b])"</p> <p>Additionally, policy requires medical and mental health practitioners, unless precluded by law, to report sexual abuse and to inform the inmate of the practitioners duty to report and the limitations of confidentiality.</p> <p>Furthermore, DC-ADM 008 PREA Procedures Manual "Section 3 - Reporting Sexual Abuse and Sexual Harassment states</p> <p>A. General</p> <p>5. If the alleged victim is under the age of 18, the Department shall refer the allegation to the designated State or Local services agency under applicable mandatory reporting laws as outlined in Department policy 1.1.16, "Mandatory Reporting Guidelines." (28 C.F.R. §115.61[d])."</p> <p>All staff interviewed were aware of their responsibility to report any knowledge, suspicion, or information regarding an incident of sexual abuse, harassment or retaliation. All staff, including security, medical, and mental health staff, indicated they would immediately report the information to the shift commander.</p> <p>During staff interviews, it was consistently reported that all allegations of sexual abuse, harassment and retaliation are taken seriously and fully investigated. At no time during inmate interviews, did an inmate report being the victim or having knowledge of a sexual abuse, harassment or retaliation incident that was not investigated.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Procedures Manual</p>

Interviews with staff  
Interviews with inmates

Corrective Action: None

115.62	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Per DC-ADM 008 PREA Procedures Manual Section 2 - Sexual Abuse/Sexual Harassment Prevention and Training, it is the PCM's responsibility to ensure that staff are trained how to respond when they learn "an inmate is subject to substantial risk of imminent sexual abuse, appropriate and immediate actions shall be taken to protect that inmate". As noted in Section 4 of DC-ADM 008 - Responding to Reports of Sexual Abuse, alleged victims of sexual abuse shall receive timely emergency medical and mental health treatment and crisis intervention services. If qualified medical and mental health practitioners are not on duty at the time of report, it is the first responders' responsibility to take preliminary steps to protect the alleged victim and immediately notify appropriate medical and mental health practitioners.</p> <p>During the pre-audit, documentation was presented which demonstrated what would occur should the situation arise, through the use of "Response to Allegations of Sexual Abuse Checklist".</p> <p>All staff interviewed recognized and articulated their responsibility in maintaining inmate safety when there are indications that an inmate is at substantial risk of imminent sexual abuse. Staff responded that they would immediately separate inmates and notify the shift commander.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Procedures Manual  Response to Allegations of Sexual Abuse Checklist - example  Staff Interviews</p> <p>Corrective Action: None</p>

115.63	<b>Reporting to other confinement facilities</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Per DC-ADM 008 PREA Procedures Manual, "Section 3 - Reporting Sexual Abuse and Sexual Harassment</p> <p>E. Inter-Facility Reports</p> <p>1.Reporting to other Confinement Facilities</p> <p>b. It is the Facility Manager/designee's responsibility to notify the head of the facility in which the reported abuse occurred. (28 C.F.R. §115.63[a]) Notification must be provided as soon as possible, but no later than 72 hours after receipt of information and documented on the Notification of Sexual Abuse Allegation to Another Facility. This document shall be maintained by the PCM in an annual file for audit verification purposes in accordance with Section o1 of this procedures manual. (28 C.F.R. §115.63[b][c])"</p> <p>When SCI-Quehanna Boot Camp receives a report from another facility, they follow:</p> <p>"2. Reports Received from Other Confinement Facilities</p> <p>a. Upon receipt of an allegation from another facility that an inmate sexually abused while confined at that location, the Facility Manager/designee at the receiving facility shall document the receipt of the allegation on the Notification of Sexual Abuse Allegation to Another Facility. (28 C.F.R. §115.63[a][d])</p> <p>b. The Facility Manager/designee shall immediately notify the Security Office to initiate a PREA investigation as outlined in Section 5 of this procedures manual. (28 C.F.R. §115.63[d])"</p> <p>In the past year, SCI-Quehanna Boot Camp received a report from an inmate alleging sexual harassment and being a witness to sexual abuse while at another facility. The Notification of sexual Abuse Allegation to Another Facility was completed on the date the information was first received by staff and was forwarded to the facility where the incident occurred. A copy of the form and email was submitted and reviewed during the pre-audit. During the past year, SCI-Quehanna Boot Camp has not received any reports of sexual abuse or sexual harassment occurring at their facility from another facility.</p> <p>During interviews, it was reported that the superintendent is the point of contact. The allegations are investigated by the facility in which the allegations occurred. Additionally, Central Office OSII tracks the investigation.</p> <p>Evidence Reviewed:</p> <p>Pre-Audit Questionnaire</p> <p>DC-ADM 008 PREA Procedures Manual</p> <p>Email notification to another facility</p> <p>Notification of Sexual Abuse Allegation to another Facility example</p> <p>Interview with superintendent</p> <p>Interview with staff</p> <p>Corrective Action: None</p>



115.64	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Per DC-ADM 008, PREA Procedures Manual, "Section 4 - Responding to Reports of Sexual Abuse</p> <p>A. First Responder Duties</p> <p>Upon learning of an allegation that an inmate was sexually abused, the first staff member to respond shall follow the procedures below.</p> <p>1. Security Staff shall:</p> <ul style="list-style-type: none"> <li>a. notify the Shift Commander;</li> <li>b. immediately separate the alleged victim and alleged abuser; (28 C.F.R. §115.64[a][1])</li> <li>c. secure any reported crime scene until appropriate steps can be taken to collect evidence; and (28 C.F.R. §115.64[a][2])</li> <li>d. If the abuse occurred within the last 96 hours that still allows for the collection of physical evidence, request the alleged victim and ensure that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. (28 C.F.R. §115.64[a][3][4])</li> </ul> <p>2. Non-Security staff shall:</p> <ul style="list-style-type: none"> <li>a. immediately notify the Shift Commander; and (28 C.F.R. SS115.64[b])</li> <li>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." </li></ul> <p>PREA response pocket cards are provided to staff which outline first responder procedures for security/non-security staff and medical staff. These cards are provided to all staff. Additionally, first responder procedures are posted at the officers' station on each living unit which were observed during the facility tour.</p> <p>During staff interviews, it was evident that staff are aware of their responsibilities as a first responder. Staff articulated the steps to take, including separating the inmates, securing the scene, ensuring the victim does not eat, use the bathroom, or brush teeth, and notifying the shift commander. PREA allegations are addressed immediately and thoroughly investigated. Inmates who were the subject of sexual harassment were satisfied with the response in terms of timeliness and outcome.</p> <p>Evidence Reviewed:</p> <ul style="list-style-type: none"> <li>Pre-Audit Questionnaire</li> <li>DC-ADM 008 PREA Procedures Manual</li> <li>First Responder card</li> <li>Response to Allegations of Sexual Abuse Checklist</li> <li>Completed investigation documents</li> <li>Instruction for PREA Evidence Retention</li> <li>Interviews with random staff</li> <li>Interviews with specialized staff</li> <li>interviews with inmates</li> <li>Facility Tour</li> </ul>

	Corrective Action: None
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<b>115.65</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>DC-ADM 008 PREA Procedures Manual - Section 4 - Responding to Reports of Sexual Abuse, requires that each facility write a specific facility plan which coordinates actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership in line with 28 C.F.R. §115.65. SCI-Quehanna Boot Camp provided their procedures manual for the purpose of the pre-audit.</p> <p>The Superintendent did confirm a coordinated plan for responding to reports of sexual abuse and that each person has a predetermined role in the process. In interviewing staff, each staff member knew their role and was able to effectively articulate what they would do if a sexual abuse incident would occur.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Procedures Manual  DC-ADM 008 - QUE PREA Procedures Manual  Interview of superintendent  Interview of staff</p> <p>Corrective Action: None</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>This standard was audited at the agency level. Per Act 195 Interest Arbitration Award "...the Commonwealth shall have no requirement to furnish 24 hours advance written notification of inmate or patient charges in accordance with Section 20, when an allegation falls within the purview of the Prison Rape Elimination Act of 2003." This was followed with a memo dated January 12, 2015 from the Secretary of Corrections to Superintendents, Bureau Directors, and Regionals Directors, which included direction on this provision of Act 195.</p>

115.67	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Per DC-ADM 008 PREA Procedures Manual - "Section 3, Reporting Sexual Abuse and Sexual Harassment</p> <p>F. Protection Against Retaliation</p> <p>The Department shall protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff. (28 C.F.R. §115.67[a])</p> <p>3. The Department shall employ multiple protection measures, such as housing changes or transfer for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victim. The Department shall also make available emotional support services for inmates or staff who fear retaliation from reporting sexual abuse or sexual harassment, or for cooperating with investigations. (28 C.F.R. §115.67[b])</p> <p>4. For at least 90 days following a report of sexual abuse, the Department shall monitor the conduct and treatment of inmates or staff who reported the sexual abuse or sexual harassment, and of inmates who were reported to have suffered sexual abuse or sexual harassment to see if there are changes that may suggest possible retaliation by inmates or staff and shall act promptly to remedy such retaliation. Items the Department shall monitor include:</p> <ul style="list-style-type: none"> <li>a. disciplinary reports;</li> <li>b. housing reports;</li> <li>c. program changes;</li> <li>d. negative performance reviews; and</li> <li>e. reassignments of staff.</li> </ul> <p>NOTE: the Department shall continue monitoring beyond 90 days if the initial monitoring indicates a continuing need. (28 C.F.R. §115.67[b][c])"</p> <p>At SCI-Quehanna Boot Camp, the PCM is responsible for retaliation monitoring of inmates and staff who have reported sexual abuse or sexual harassment or fear of retaliation due to cooperating with an investigation. Counselors also monitor inmates who have reported PREA issues to ensure their needs are being met and the inmate is free from retaliation. The PCM or the counselor initiates contact with the reporting inmate within 96 hours of report. The PCM also determines if there is a continued need to extend periodic status checks beyond the initial 90 days. Monitoring is documented on the Retaliation Monitoring form and included in the PREA Monthly Report. The Retaliation Monitoring form was reviewed during the pre-audit. SCI-Quehanna Boot Camp has not had any incidents of retaliation in the past twelve months.</p> <p>None of the inmates interviewed had reported allegations of sexual abuse, harassment, or retaliation at SCI-Quehanna Boot Camp. At the time of the Pre-Audit, there were no inmates who filed a report within the past twelve months. However, inmates had reported incidents from other institutions and were monitored using the Retaliation Monitoring form. During the on site visit and interviews, it was reported that there were two recent incidents of sexual harassment at SCI-Quehanna Boot Camp. In both cases, the incidents were reported by witnesses. In one incident, the inmate perpetrator was transferred from the institution and in the second incident, the inmates were reassigned housing. In both instances, the PCM is</p>

monitoring and checking in with the inmates to ensure safety and that treatment needs are being met.

Evidence Reviewed:

Pre-Audit Questionnaire

ADM-008 PREA Procedures Manual

Retaliation Monitoring Forms

Interview with Superintendent

Interview with staff

Interview with inmates

Corrective Action: None

<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Per DC-ADM 008 PREA Procedures Manual "Section 2 - Sexual Abuse/Sexual Harassment Prevention and Training  6. Protective Custody  Inmates at a high risk for sexual victimization or inmates who have allegedly suffered sexual abuse shall not be placed in 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 not other available alternative means of separation from likely abusers. If the facility cannot conduct the assessment immediately, the facility may hold the inmate in involuntary AC for less than 24 hours while completing the assessment. (28 C.F.R. §115.43[a]) (28 C.F.R. §115.68)"</p> <p>SCI- Quehanna Boot Camp does not have Administrative Custody cells. If an inmate needs to be separated as a means of protection, male inmates will be transferred to SCI-Houtzdale and female inmates will be transferred to SCI-Muncy.</p> <p>This was confirmed through staff interviews and a tour of the facility. A victim of sexual abuse or at a high risk of sexual abuse will not be placed in administrative confinement. The inmate will be monitored closely by staff and other steps will be taken to protect the inmate, such as housing or bed assignments closer to the officer station.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Procedures Manual  Interview with staff  Interview with inmates  Facility tour</p> <p>Corrective Action: None</p>

115.71	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Per DC-ADM 008 PREA Procedures Manual Section 5 - Investigating Allegations of Sexual Abuse and/or Sexual Harassment</p> <p>"Every report, complaint, or allegation of sexual abuse and sexual harassment, including third party and anonymous reports, shall be investigated promptly, thoroughly, and objectively. (28 C.F.R. §115.22[a][d]) (28 C.F.R. §115.61[e]) (28 C.F.R. §115.71[a])"</p> <p>According to DC-ADM 008, PREA investigators who conduct administrative investigations receive standardized Department wide training in sexual abuse investigations, they gather evidence, interview alleged victims, suspected abusers, and witnesses, and review prior complaints and sexual abuse reports involving suspected abusers. When the evidence appears to support criminal prosecution, the Department consults with prosecutors prior to conducting compelled interviews. Credibility of an alleged victim, suspect or witness is assessed on an individual basis and not predicated on the status as inmate or staff. Further, the Department does not require the alleged victim to submit to a polygraph examination or other device as a condition of proceeding with the investigation.</p> <p>Per DC-ADM 008 the investigator shall: "make an effort to determine whether staff actions or failures to act contributed to the abuse, specifically as it applies to administrative investigations. (28 C.F.R. §115.71[f][1])"</p> <p>The Pennsylvania State Police conduct the criminal investigations, confirmed by the MOU provided by SCI-Quehanna Boot Camp. During a criminal investigation, per policy ADM 008 "The Department shall fully cooperate in the investigation conducted by the PSP or other applicable outside law enforcement agency. (28 C.F.R. §115.71[1])"</p> <p>At the conclusion of both the administrative investigation and criminal investigation, an Investigative Summary is completed and the PREA Tracking System is update. All investigative information and related documentation is retained by Department for as long as the alleged abuser is incarcerated or employed by the Department plus five years.</p> <p>During the past year, SCI-Quehanna Boot Camp has not had any substantiated PREA allegations appearing criminal in nature, resulting in no cases being referred for prosecution.</p> <p>According to the facility's lead investigator, he completed PREA investigation training through the Department of Corrections Academy. All sexual abuse and sexual harassment reports are investigated, regardless of who makes the report or if it is anonymous. Within 24 hours of receiving a report of sexual abuse or harassment, the investigation begins and is completed within 30 days. If the allegations appear to be criminal in nature, the case is referred to the Pennsylvania State Police (PSP). The DOC investigator will continue to follow the case and work with PSP as requested. Upon completion of the administrative investigation, the investigator completes a thorough report which is submitted to the PCM and OSII. An Incident Response Team also reviews the summary and findings to determine if the facility could do something differently to prevent similar incidents from occurring. The IRT reviews the property</p>

and set up, monitoring technology, blind spots, and staffing patterns. Their findings will influence policy and procedures at the facility.

Evidence Reviewed:

Pre-Audit Questionnaire

DC-ADM 008 PREA Procedures Manual

Interview with investigator

Interview with PCM

Interview with Superintendent

Corrective Action: None

115.72	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Per DC-ADM PREA Procedures Manual, "Section 5 - Investigating Allegations of Sexual Abuse and/or Sexual Harassment</p> <p>A. General Responsibilities</p> <p>9. In administrative investigations, the Department shall impose no standards higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. (28 C.F.R. §115.72)"</p> <p>This practice was confirmed by the PCM.</p> <p>Evidence Reviewed:</p> <p>Pre-Audit Questionnaire</p> <p>DC-ADM 008 PREA Procedures Manual</p> <p>Interview with PCM</p> <p>Corrective Action: None</p>

115.73	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Per DC-ADM 008 PREA Procedure, "Section 5 - Investigating Allegations of Sexual Abuse and/or Sexual Harassment</p> <p>A. Notification to Inmates</p> <ol style="list-style-type: none"> <li>1. Following the investigation into an inmate's allegations of sexual abuse in a facility within the Department, the Prison Rape Elimination Act (PREA) Compliance Manager (PCM) at the facility where the inmate is housed shall inform the inmate, in writing within five business days of the closure of the investigation on the PREA Investigation-Inmate Notification Form (Attachment 9-A) as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. (28 C.F.R. §115.73[a])</li> <li>2. If another agency conducts the investigation, the PCM shall request the relevant information from the investigative agency in order to inform the inmate within ten business days of receipt of this information. (28 C.F.R. §115.73[b])</li> <li>3. Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the PCM shall subsequently inform the inmate when any of the following occurs: (28 C.F.R. §115.73[c]) <ol style="list-style-type: none"> <li>a. the staff member is no longer posted within the inmate's unit; (28 C.F.R. §115.73[c][1])</li> <li>b. the staff member is no longer employed at the facility; (28 C.F.R. §115.73[c][2])</li> <li>c. the Department learns that the staff member has been criminally charged related to the sexual abuse within the facility; or (28 C.F.R. §115.73[c][3])</li> <li>d. the Department learns that the staff member has been convicted on a charge related to sexual abuse within the facility. (28 C.F.R. §115.73[c][4])</li> </ol> </li> <li>4. Following an inmate's allegation the he/she has been sexually abused by another inmate, the PCM shall subsequently inform the alleged victim whenever: (28 C.F.R. §115.73[d]) <ol style="list-style-type: none"> <li>a. the Department learns that the alleged abuser has been criminally charged related to the sexual abuse within the facility; or (28 C.F.R. §115.73[d][1])</li> <li>b. the Department learns that the abuser has been convicted on a charge related to sexual abuse within the facility. (28 C.F.R. §115.73[d][2])"</li> </ol> </li> </ol> <p>Inmates are notified of PREA investigation outcomes through the use of the PREA Investigation Notification Form. SCI-Quehanna Boot Camp has notified inmates of PREA investigation outcomes from investigations at other facilities, as well as their own. Documentation was provided for the notifications using the PREA Investigation - Inmate Notification. The PREA Investigation Notification Form provides the investigation status, the staff update, and criminal action status. The inmate signs the form, acknowledging receipt of the information. During the pre-audit completed forms were provided for review.</p> <p>According to staff interviews, inmates are notified of the outcome of all PREA related investigations by the PCM.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Procedures Manual  PREA Investigation - Inmate Notification</p>

Interviews with staff

Corrective Action: None

<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Per DC-ADM 008 PREA Procedures Manual "Section 7 - Discipline Related to Sexual Abuse, Sexual Harassment, and Retaliation</p> <p>A. Staff Discipline</p> <p>1. Any employee who violated 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. (28 C.F.R. §115.76[a])</p> <p>2. 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. (28 C.F.R. §115.76[8])"</p> <p>The PREA policy is also mirrored in the Human Resources and Labor Relations Bulletin Policy 4.1.1-1, Section 4 Resignations in Lieu of Discharge issued on 1/30/08 and effective 2/7/08.</p> <p>Policy 4.1.1-1 Human Resources and Labor Relations Bulletin , Section 7 - Standardization of Pre-Disciplinary Conferences issued on 6/16/05 and effective 6/23/05 states:</p> <p>"Subsections F.10. &amp; 11. shall now read:</p> <p>10. Inmate Sexual Abuse: In accordance with the Prison Rape Elimination Act of 2003, Standard § 115.76(b), termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.</p> <p>11. 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>Per Human Resources at SCI- Quehanna Boot Camp, there have not been any instances of staff violating policies related to sexual abuse or sexual harassment thereby, no need for staff discipline in this area.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Procedures Manual  4.1.1-1 Human Resources and Labor Relations Policy  Interview with Superintendent  Interview with Investigator</p> <p>Corrective Action: None</p>

<b>115.77</b>	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Per DC-ADM 008 PREA Procedure Manual "Section 7 - Discipline Related to Sexual Abuse, Sexual Harassment, and Retaliation</p> <p>B. Corrective Action for Contractors and Volunteers</p> <p>1. when an allegation is made involving a contractor or volunteer, this person shall be removed from contact with the alleged victim until the conclusion of this investigation;</p> <p>2. if a contractor or volunteer violates this procedures manual, other than by engaging in sexual abuse, the facility shall take appropriate remedial measures and shall consider whether to prohibit further contact with inmates (28 C.F.R. §115.77[b]); and</p> <p>3. any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with inmates, and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. (28 C.F.R. §115.77[a]); "</p> <p>According to the volunteer coordinator for SCI-Quehanna Boot Camp, there have not been any volunteers or contractors who have engaged in sexual abuse of inmates. If allegations were made, the volunteer would immediately be suspended pending a thorough investigation.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Procedures Manual  Interviews with Volunteer Coordinator  Interview with Superintendent</p> <p>Corrective Action: None</p>

115.78	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Per DC-ADM 008 PREA Procedures Manual, "Section 7 - Discipline Related to Sexual Abuse, Sexual Harassment, and Retaliation</p> <p>C. Inmate Discipline</p> <ol style="list-style-type: none"> <li>1. Inmates shall be subject to disciplinary sanctions pursuant to the formal disciplinary process, following an administrative finding that the inmate engaged in inmate on inmate sexual abuse or following a criminal finding of guilt for inmate on inmate sexual abuse. (28 C.F.R. §115.78[a])</li> <li>2. Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. (28 C.F.R. §115.78[b])</li> <li>3. The disciplinary process shall consider whether an inmate's mental disabilities or mental illness contributed to his/her behavior when determining what type of sanction, if any, should be imposed. (28 C.F.R. §115.78[c])</li> <li>4. When an inmate is found guilty of a Class 1 Misconduct related to sexual abuse, the Unit Manager shall refer the inmate to the Sex Offender Treatment Program for evaluation to determine whether or not the inmate is appropriate for the program, and if the inmate will be required to complete the program as part of the sanctions or as a condition to access programming or other benefits. (28 C.F.R. §115.78[d])</li> <li>5. The facility may discipline an inmate for sexual contact with staff only if it is substantiated that the staff member did not consent to such contact. (28 C.F.R. §115.78[e])</li> <li>6. For the purpose of disciplinary action, a report of sexual abuse made in good faith, based upon a reasonable belief that the alleged conduct occurred, shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation. (28 C.F.R. §115.78[f])</li> <li>7. The Department prohibits all sexual activity between inmates and may discipline inmates for such activity. The Department shall not deem such activity to constitute sexual abuse if the Department, through the investigative process, determines that the activity is not coerced or forced. (28 C.F.R. §115.78[g])</li> <li>8. A reporting inmate can only be subject to disciplinary action for sexual abuse or sexual harassment allegations which have been unfounded and for which the investigation was satisfactorily approved by the Office of Special Investigations and Intelligence (OSII). "</li> </ol> <p>SCI-Quehanna Boot Camp has not disciplined any inmate for alleging PREA violations. An inmate requiring sex offender programming would not be housed at Quehanna Boot Camp, as the facility does not offer the programming and therefore, cannot appropriately house an inmate with those needs. If an inmate is involved in inmate on inmate sexual contact, sexual abuse, or harassment, the inmate would go through the misconduct system. Depending on the misconduct and the needs of the inmate, the inmate would likely be removed from the program.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Procedures Manual</p>

Interview with Superintendent

Corrective Action: None

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>According to DC-ADM 008 PREA Procedures Manual, "Section 2 - Sexual Abuse /Sexual Harassment Prevention and Training</p> <p>D. Medical and Mental Health Screenings</p> <p>2. 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. (28 C.F.R. §115.81[a][c])</p> <p>3. 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. (28 C.F.R. §115.81[b])</p> <p>4. 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. (28 C.F.R. §115.81[d])</p> <p>5. 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. (28 C.F.R. §115.81[e]). The DC-484, Mental Health Informed Consent Form shall be used for this purpose in accordance with Department policy 13.8.1, 'Access to Mental Health Care'. If the inmate refuses to sign, it shall be noted on the DC-484 and signed by the witness and maintained in the medical record. "</p> <p>During the past twelve months, all inmates who disclosed sexual victimization were offered an appointment with medical and mental health practitioners within 14 days of disclosure during the intake process. During the past twelve months, there has not been an inmate who was identified during intake as having perpetrated sexual abuse. Documentation provided by SCI-Quehanna Boot Camp demonstrated that follow up appointments occurred within the 14 days of disclosure and that Mental Health Informed Consent Document (DC-484) and Outside Supportive Services Offering was signed by referred inmates.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Procedures Manual  Mental Health Referral form example  Informed Consents examples  Outside Support Services Offer examples  Callout for female Passages group  Interview with medical staff</p> <p>Corrective Action: None</p>



115.82	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>According to DC-ADM 008 PREA Procedures Manual, "Section 4 - Responding to Reports of Sexual Abuse</p> <p>D. Emergency Medical and Mental Health Treatment Services</p> <p>1. General</p> <p>a. 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. (28 C.F.R. §115.82[a])</p> <p>b. If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the alleged victim, in accordance with Prison Rape Elimination Act (PREA) Standard 28 C.F.R. §115.62 and shall immediately notify the appropriate medical and mental health practitioners. (28 C.F.R. §115.82[b])</p> <p>c. 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. (28 C.F.R. §115.83[g]) (28 C.F.R. §115.21[c]) (28 C.F.R. §115.82[d])"</p> <p>PREA Procedures also outlines in "Section 2, 2. Medical</p> <p>g. For all Sexual Abuse Cases</p> <p>3. The alleged victim of sexual abuse 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. (28 C.F.R. §115.82[c])"</p> <p>During the past twelve months, SCI-Quehanna Boot Camp has not had any incidences in which an inmate required emergency contraception, prophylaxis, or other outside medical treatment services due to abuse.</p> <p>When a sexual abuse incident is reported, the medical staff at SCI-Quehanna Boot Camp immediately responds to the victim. They complete paperwork and notifications and the inmate is then transported to Mt. Nittany Medical Center for emergency medical treatment and forensic examination. The victim would not be charged fees for medical services.</p> <p>Evidence Reviewed:</p> <p>Pre-Audit Questionnaire</p> <p>DC-ADM 008 PREA Procedures Manual</p> <p>Medical Incident/Injury Report example</p> <p>Response to Allegation of Sexual Abuse Checklist</p> <p>Interview with medical staff</p> <p>Interview with random staff</p> <p>interview with Mt. Nittany emergency room staff</p>

Corrective Action: None

115.83	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Per DC-ADM 008 PREA Procedures Manual Section 4 - Responding to Reports of Sexual Abuse</p> <p>"F. Continuity of Care</p> <p>On going medical and mental health treatment shall be available for inmates who have been victimized by sexual abuse. This includes appropriate follow-up services and, when necessary, referrals for continued care following their transfer to other facilities and/or their release from the Department."</p> <p>Per DC-ADM 008, this medical and mental health treatment includes pregnancy tests, tests for sexually transmitted infections, and pregnancy related services. The medical and mental health treatment shall be consistent with the community level of care and shall be provided to the alleged victim without financial cost to the victim.</p> <p>Additionally, DC-ADM 008 Section 2 - Sexual Abuse/Sexual Harassment Prevention and Training states "a mental health evaluation will be conducted on these abusers (sexual predators) within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners. (28 C.F.R. §115.83[h])"</p> <p>During the past twelve months, SCI-Quehanna Boot Camp has not had any incidents of known inmate on inmate abuse, or any abuse resulting in pregnancy or requiring testing for sexually transmitted diseases. SCI-Quehanna Boot Camp has provided inmates who have been identified as having been the victim of sexual abuse with a referral for medical and mental health services. Inmates have the option of on going mental health services. The referrals are made as soon as staff are aware of the sexual victimization. Additionally, inmates are offered on going support through Passages Inc. 2. Due to the programming and structure of SCI-Quehanna Boot Camp, inmates identified as sexual perpetrators are typically not found appropriate for this facility. However, if they have been screened appropriate for the SCI-Quehanna Boot Camp, the inmate would have completed sex offender programming. The inmate would be offered follow up services through SCI-Quehanna Boot Camp Psychological Services.</p> <p>Evidence Reviewed:</p> <ul style="list-style-type: none"> <li>Pre-Audit Questionnaire</li> <li>DC-ADM 008 PREA Procedures Manual</li> <li>Mental Health Contact Note example</li> <li>Email ensuring psychological services referral was made example</li> <li>Interviews with staff</li> </ul> <p>Corrective Action: None</p>

115.86	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>According to DC-ADM 008 PREA Procedures Manual, "Section 6 Sexual Abuse Incident Review</p> <p>A. General</p> <p>1. 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. (28 C.F.R.§115.86[a]) The review shall occur within 15 working days of the receipt of the notification of OSII that the investigation was deemed satisfactory. (28 C.F.R.§115.86[b])"</p> <p>Per policy, the PREA Compliance Manager (PCM) shall chair the SAIR Committee and at a minimum will include: Deputy Superintendent for Centralized Services (DSCS), Deputy Superintendent or Facilities Management (DSFM), Licensed Psychology Manager (LPM)/Designee, Correction Health Care Administrator (CHCA)/Designee, Security Office representative, and Major of Unit Management or Major of the Guard. During the review, the committee will consider the need to change policy or practice to better prevent, detect or respond to sexual abuse, will consider the motivation behind the sexual abuse incident, will examine the area of the facility where the incident occurred to assess physical barriers that may have enabled the abuse, assess staffing patterns, and the need for additional monitoring technology. The PCM will submit a report with recommendations to the Facility Manager for review and then forward to the DOC PREA Reports email address, Executive Secretary, and Regional Deputy Secretary.</p> <p>Per Policy, "The facility shall implement the recommendations for improvement or shall document its reasons for not doing so on the PREA Sexual Abuse Incident Review Plan of Action provided by the Central Office PREA ARC."</p> <p>During the past year, SCI-Quehanna Boot Camp has not convened a Sexual Abuse Incident Review as they have not had any allegations of sexual abuse occurring at the facility. However, when an IRT is assembled, policy is followed. The IRT is used as a learning experience to determine how SCI-Quehanna Boot Camp could do things differently to avoid a similar situation in the future. Some considerations are the layout of the property, staffing patterns, staff training, and facility procedures. A summary and recommendations is written and forwarded to the Superintendent and Central Office.</p> <p>Evidence Reviewed:  Pre-Audit Questionnaire  DC-ADM 008 PREA Procedures Manual  Interview with Superintendent  Interview with target staff</p> <p>Corrective Action: None</p>

<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>The staff at SCI-Quehanna Boot Camp were very accommodating throughout the entire audit process. Documentation was provided with sufficient time to conduct a thorough review before the on site visit. Any additional requests for documentation and information during the audit were provided.</p> <p>The auditors received a complete tour of the facility, encompassing all areas that inmates are permitted. Auditors were allowed full access to, and the ability to observe all areas of SCI-Quehanna Boot Camp.</p> <p>Auditors were provided private, confidential offices in which to conduct interviews with staff and inmates. During the PRE-Audit phase, photographs depicting the Audit Notice posted throughout SCI-Quehanna Boot Camp were received. During the tour, audit notices were viewed in each housing unit and other common areas throughout the facility such as medical and dining halls. Although no inmates wrote to the auditors, inmates acknowledged the posted signs and provided interviews with the auditors.</p>

115.403	<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.)	na

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".)	na

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.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A here for facilities with less than 50 inmates before August 20,2017.)	yes

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

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

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

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

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

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

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

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

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

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

<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.)	yes

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

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

115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice’s Office on Violence Against Women publication, “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	no

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

115.21 (d)	<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.)	na

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?	no

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

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

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

<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.)	yes

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

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

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

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