

# PREA Facility Audit Report: Final

**Name of Facility:** Nevada Southern Detention Center

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 04/21/2023

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input 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 type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Jillian Shane	<b>Date of Signature:</b> 04/21/2023

AUDITOR INFORMATION	
<b>Auditor name:</b>	Shane, Jillian
<b>Email:</b>	jillianshane@sbcglobal.net
<b>Start Date of On-Site Audit:</b>	02/21/2023
<b>End Date of On-Site Audit:</b>	02/24/2023

FACILITY INFORMATION	
<b>Facility name:</b>	Nevada Southern Detention Center
<b>Facility physical address:</b>	2190 East Mesquite Avenue, Pahrump, Nevada - 89060
<b>Facility mailing address:</b>	

<b>Primary Contact</b>	
<b>Name:</b>	Timothy Stutzman
<b>Email Address:</b>	Timothy.Stutzman@corecivic.com
<b>Telephone Number:</b>	2089411108

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Christopher Chestnut
<b>Email Address:</b>	christopher.chestnut@corecivic.com
<b>Telephone Number:</b>	(775)751-4501

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	Brandon Delaney
<b>Email Address:</b>	brandon.delaney@corecivic.com
<b>Telephone Number:</b>	
<b>Name:</b>	Kayla Murphy
<b>Email Address:</b>	kayla.murphy@corecivic.com
<b>Telephone Number:</b>	

<b>Facility Health Service Administrator On-site</b>	
<b>Name:</b>	Kenneth D'Amico
<b>Email Address:</b>	kenneth.d'amico@corecivic.com
<b>Telephone Number:</b>	(775)751-4554

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	1064
<b>Current population of facility:</b>	709
<b>Average daily population for the past 12 months:</b>	700
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>Which population(s) does the facility hold?</b>	Both females and males
<b>Age range of population:</b>	37
<b>Facility security levels/inmate custody levels:</b>	Maximum Security- Low, Moderate, High
<b>Does the facility hold youthful inmates?</b>	No
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	233
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	18
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	5

<b>AGENCY INFORMATION</b>	
<b>Name of agency:</b>	CoreCivic, Inc.
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	5501 Virginia Way, Suite 110, Brentwood, Tennessee - 37027
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

<b>Agency Chief Executive Officer Information:</b>	
<b>Name:</b>	Damon T. Hininger
<b>Email Address:</b>	
<b>Telephone Number:</b>	

<b>Agency-Wide PREA Coordinator Information</b>			
<b>Name:</b>	Eric Pierson	<b>Email Address:</b>	Eric.Pierson@corecivic.com

<b>SUMMARY OF AUDIT FINDINGS</b>	
<p>The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.</p> <p>Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.</p>	
<b>Number of standards exceeded:</b>	
0	
<b>Number of standards met:</b>	
45	
<b>Number of standards not met:</b>	
0	

## POST-AUDIT REPORTING INFORMATION

# GENERAL AUDIT INFORMATION

### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2023-02-21
2. End date of the onsite portion of the audit:	2023-02-24

### Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Rape Crisis Center (advocacy and SANE) Nye Sherriff's Office

# AUDITED FACILITY INFORMATION

14. Designated facility capacity:	1064
15. Average daily population for the past 12 months:	700
16. Number of inmate/resident/detainee housing units:	709
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

## **Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit**

### **Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit**

<b>36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	752
<b>38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</b>	3
<b>39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</b>	1
<b>40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:</b>	22

<p><b>43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>6</p>
<p><b>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>3</p>
<p><b>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>2</p>
<p><b>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</b></p>	<p>The facility advised the auditor on numerous questions that the information is not tracked at this facility. They made their best attempts to answer.</p>
<p><b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b></p>	
<p><b>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</b></p>	<p>233</p>

<p><b>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b></p>	<p>8</p>
<p><b>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b></p>	<p>18</p>
<p><b>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>a couple of the volunteers were in training, just cleared</p>

## INTERVIEWS

### Inmate/Resident/Detainee Interviews

#### Random Inmate/Resident/Detainee Interviews

<p><b>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>23</p>
<p><b>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b></p>	<p><input checked="" type="checkbox"/> Age</p> <p><input checked="" type="checkbox"/> Race</p> <p><input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</p> <p><input checked="" type="checkbox"/> Length of time in the facility</p> <p><input checked="" type="checkbox"/> Housing assignment</p> <p><input checked="" type="checkbox"/> Gender</p> <p><input type="checkbox"/> Other</p> <p><input type="checkbox"/> None</p>



<b>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b>	I reviewed and was provided rosters for the GP with DOB, housing, nationality and intake date as well as gender (by pod) and selected from there. In addition, I was provided various speciality lists and selected from there and the file reviews.
<b>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No
<b>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b>	No barriers that I am aware of.
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
<b>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	9
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<b>60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b>	3

<p><b>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>2</p>
<p><b>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>There were no inmates in the category in the facility.</p>
<p><b>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>There were no inmates in the category in the facility.</p>
<p><b>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>3</p>
<p><b>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>1</p>
<p><b>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>2</p>
<p><b>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</b></p>	<p>2</p>
<p><b>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</b></p>	<p>3</p>

<p><b>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>There were no inmates in the category in the facility.</p>
<p><b>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>No barriers</p>
<p><b>Staff, Volunteer, and Contractor Interviews</b></p>	
<p><b>Random Staff Interviews</b></p>	
<p><b>71. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>15</p>

<p><b>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b></p>	<p><input type="checkbox"/> Length of tenure in the facility</p> <p><input type="checkbox"/> Shift assignment</p> <p><input type="checkbox"/> Work assignment</p> <p><input type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p><b>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b></p>	<p>Sampled additional random staff.</p>
<p><b>Specialized Staff, Volunteers, and Contractor Interviews</b></p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p><b>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b></p>	<p>30</p>
<p><b>76. Were you able to interview the Agency Head?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<b>78. Were you able to interview the PREA Coordinator?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>79. Were you able to interview the PREA Compliance Manager?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

**80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)**

- Agency contract administrator
- Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment
- Line staff who supervise youthful inmates (if applicable)
- Education and program staff who work with youthful inmates (if applicable)
- Medical staff
- Mental health staff
- Non-medical staff involved in cross-gender strip or visual searches
- Administrative (human resources) staff
- Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff
- Investigative staff responsible for conducting administrative investigations
- Investigative staff responsible for conducting criminal investigations
- Staff who perform screening for risk of victimization and abusiveness
- Staff who supervise inmates in segregated housing/residents in isolation
- Staff on the sexual abuse incident review team
- Designated staff member charged with monitoring retaliation
- First responders, both security and non-security staff

	<input checked="" type="checkbox"/> Intake staff  <input checked="" type="checkbox"/> Other
<b>If "Other," provide additional specialized staff roles interviewed:</b>	Mailroom, maintenance, training, grievance, food service
<b>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No
<b>a. Enter the total number of VOLUNTEERS who were interviewed:</b>	1
<b>b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Education/programming  <input type="checkbox"/> Medical/dental  <input type="checkbox"/> Mental health/counseling  <input checked="" type="checkbox"/> Religious  <input type="checkbox"/> Other
<b>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No
<b>a. Enter the total number of CONTRACTORS who were interviewed:</b>	1



<p><b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b></p>	<p><input type="checkbox"/> Security/detention</p> <p><input type="checkbox"/> Education/programming</p> <p><input checked="" type="checkbox"/> Medical/dental</p> <p><input type="checkbox"/> Food service</p> <p><input type="checkbox"/> Maintenance/construction</p> <p><input type="checkbox"/> Other</p>
<p><b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b></p>	<p>None</p>

## SITE REVIEW AND DOCUMENTATION SAMPLING

### Site Review

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.

<p><b>84. Did you have access to all areas of the facility?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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**Was the site review an active, inquiring process that included the following:**

<b>85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>88. Informal conversations with staff during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</b>	No text provided.

**Documentation Sampling**

Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.

<b>90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
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**91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).**

No text provided.

# SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

## Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.

**92. Total number of SEXUAL ABUSE allegations and investigations overview during the 12 months preceding the audit, by incident type:**

	<b># of sexual abuse allegations</b>	<b># of criminal investigations</b>	<b># of administrative investigations</b>	<b># of allegations that had both criminal and administrative investigations</b>
<b>Inmate-on-inmate sexual abuse</b>	4	0	4	0
<b>Staff-on-inmate sexual abuse</b>	12	0	12	0
<b>Total</b>	16	0	16	0

**93. Total number of SEXUAL HARASSMENT allegations and investigations overview during the 12 months preceding the audit, by incident type:**

	<b># of sexual harassment allegations</b>	<b># of criminal investigations</b>	<b># of administrative investigations</b>	<b># of allegations that had both criminal and administrative investigations</b>
<b>Inmate-on-inmate sexual harassment</b>	9	0	9	0
<b>Staff-on-inmate sexual harassment</b>	2	0	2	0
<b>Total</b>	11	0	11	0

## **Sexual Abuse and Sexual Harassment Investigation Outcomes**

### **Sexual Abuse Investigation Outcomes**

Note: these counts should reflect where the investigation is currently (i.e., if a criminal investigation was referred for prosecution and resulted in a conviction, that investigation outcome should only appear in the count for “convicted.”) Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual abuse investigation files, as applicable to the facility type being audited.

**94. Criminal SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:**

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
<b>Inmate-on-inmate sexual abuse</b>	0	0	0	0	0
<b>Staff-on-inmate sexual abuse</b>	0	0	0	0	0
<b>Total</b>	0	0	0	0	0

**95. Administrative SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:**

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	0	2	2	0
<b>Staff-on-inmate sexual abuse</b>	0	10	2	0
<b>Total</b>	0	12	4	0

**Sexual Harassment Investigation Outcomes**

Note: these counts should reflect where the investigation is currently. Do not double count. Additionally, for question brevity, we use the term "inmate" in the following questions. Auditors should provide information on inmate, resident, and detainee sexual harassment investigation files, as applicable to the facility type being audited.

**96. Criminal SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:**

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
<b>Inmate-on-inmate sexual harassment</b>	0	0	0	0	0
<b>Staff-on-inmate sexual harassment</b>	0	0	0	0	0
<b>Total</b>	0	0	0	0	0

**97. Administrative SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:**

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	0	3	6	0
<b>Staff-on-inmate sexual harassment</b>	0	0	2	0
<b>Total</b>	0	3	8	0

**Sexual Abuse and Sexual Harassment Investigation Files Selected for Review**

**Sexual Abuse Investigation Files Selected for Review**

**98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:**

11

<p><b>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
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**Inmate-on-inmate sexual abuse investigation files**

<p><b>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>2</p>
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<p><b>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
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<p><b>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
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**Staff-on-inmate sexual abuse investigation files**

<p><b>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>4</p>
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<p><b>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
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<p><b>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
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**Sexual Harassment Investigation Files Selected for Review**

<p><b>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>4</p>
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<p><b>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
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**Inmate-on-inmate sexual harassment investigation files**

<p><b>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>2</p>
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<p><b>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
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<p><b>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
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## Staff-on-inmate sexual harassment investigation files

<b>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	2
<b>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</b>	No text provided.

## SUPPORT STAFF INFORMATION

### DOJ-certified PREA Auditors Support Staff

<b>115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
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## Non-certified Support Staff

**116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.**

Yes

No

## AUDITING ARRANGEMENTS AND COMPENSATION

**121. Who paid you to conduct this audit?**

The audited facility or its parent agency

My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)

A third-party auditing entity (e.g., accreditation body, consulting firm)

Other

## **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.

<p><b>115.11</b></p>	<p><b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>115.11 (a): Policy 14-02, Sexual Abuse Prevention and Response states that CoreCivic is committed to protecting inmates and detainees from personal abuse, corporal punishment, personal injury, disease, property damage and harassment. Sexual abuse in correctional institutions is a public safety issue that can impact facility order and security. It victimizes vulnerable inmates/detainees, causes psychological trauma, can increase the spread of communicable diseases, and can elevate the risk of violence and tension in a correctional facility. Core Civic has zero tolerance toward all forms of sexual abuse and sexual harassment. When it is learned that an inmate may be subjected to a substantial risk of imminent sexual abuse, immediate action shall be taken to protect the inmate/detainee. Inmates who sexual abuse fellow inmates will be disciplined and may be subject to criminal prosecution. Inmate victims of sexual abuse or harassment will be provided with a supportive and protective environment. Regardless of consensual status, sexual activity between inmates and employees, contractors, or volunteers is strictly prohibited and is subject to administrative and criminal disciplinary sanctions. It is Core Civic policy to aggressively investigate all allegations, regardless of the source, and prosecute those who are involved in incidents of sexual abuse that are criminal in nature.</p> <p>Policy 14-02, Sexual Abuse Prevention and Response further details and outlines the CoreCivic’s approach to preventing, detecting and responding to sexual abuse and sexual harassment. These sections of policy include, but are not limited to Reporting for staff, inmate/inmate reporting, training, background checks, staffing, supervision and monitoring, Sexual Abuse Response Team (SART), inmate/inmate screening and education, response procedures, and investigations.</p> <p>115.11 (b): CoreCivic has designated a Senior Director, PREA Compliance and Programs to be the agency PREA Coordinator. This upper-level management Facility Support Center employee is responsible for development, implementation, and oversight of CoreCivic efforts to comply with PREA Standards and the agency Sexual Abuse Response and Prevention Program. He provides supervisory oversight to all CoreCivic facilities ensuring coordination in the prevention, detection, interventions, investigation, and disciplinary/prosecution of sexual abuse as outlines in this policy.</p> <p>115.11 (c): Policy 14-02, Sexual Abuse Prevention and Response states that each CoreCivic facility has a designated PREA Compliance Manager to coordinate efforts at the facility level to comply with PREA standards. This position is an Administrative Duty Officer level manager appointed by the Warden who maintains responsibility for the facility’s Sexual Abuse Response and Prevention Program.</p> <p>An interview as well as numerous informal discussions were conducted with the PREA</p>
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Coordinator (PC) for the Agency. He was extremely knowledgeable about his roles and responsibilities, the standards, the policy and the things that our in operations for this facility and the Agency. He indicated that he feels that he has proper authority and time to complete the duties which could also be seen by the response from staff, the documents reviewed and the processes in place.

An interview as well as numerous informal discussions were conducted with the PREA Compliance Manager (PCM) for the facility. He was extremely knowledgeable in his duties and the role of the position, despite being in this role for a short period of time. CoreCivic management stated that additional training, education and meetings would also be forthcoming. In addition, the QAM as well as numerous other high level staff were engaged, knowledgeable and able to support the PREA functions.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

Prisons and Jails PREA Standards Compliance Checklist

Policy 14-02 Sexual Abuse Prevention and Response

Organizational Chart for CoreCivic Correctional Programs Division

Job Description of the Senior Director, PREA Programs and Compliance

HR Email Announcing PREA Audit & Compliance Senior Director

Email introducing the Director of PREA Compliance and Investigations

CoreCivic Summary of Current Job Performance Characteristics for Senior Director of PREA Programs and Compliance

Interview of PREA Coordinator for CoreCivic (Senior Director)

Interview of PREA Compliance Manager

Organizational Chart

Memo

<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>A contract with the USMS was entered into with CoreCivic on March 14, 2014. It states, in part, that the customer shall incorporate and implement comprehensive approaches that are in compliance with the National Standards to Prevent, Detect and Respond to the Prison Rape which took effect on August 20, 2012. In addition, a contract modification was reviewed, dated December 12, 2013 which stated that the contract is hereby modified to incorporate an attached document for the Prisoner Rape Elimination Act, published February 2008. It stated that this documentation shall be on the detainee bulletin boards in all units. Additionally, the 1-800 used must be accessible to the detainee telephone system.</p> <p>A memo was provided in the file from the Warden which states that CoreCivic is a private provider and does not contract with other agencies for the confinement of those in their care.</p> <p>Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:</p> <p>Prisons and Jails PREA Standards Compliance Checklist  Policy 14-02 Sexual Abuse Prevention and Response  Interview with Vice President Operations Administration</p> <p>CoreCivic Contract with USMS</p>

<b>115.13</b>	<b>Supervision and monitoring</b>
	<p data-bbox="256 188 983 224"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 557 300"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1417 497">(a) Policy 14-02, Sexual Abuse Prevention and Response states that it is CoreCivic policy to aggressively investigate all allegations, regardless of the source, and prosecute those who are involved in incidents of sexual abuse that are criminal in nature.</p> <p data-bbox="256 551 1401 622">Policy 14-02 Sexual Abuse Prevention and Response states in section D, Staffing, that:</p> <p data-bbox="256 676 1481 833">The facility, in coordination with CoreCivic FSC will develop, shall develop a staffing plan that provides for adequate levels of staffing to protect inmates/detainees against sexual abuse. The location of video monitoring systems will be considered when determining adequate levels of staff.</p> <p data-bbox="256 887 1433 958">The policy continues on to state that in calculating staff levels and determining the need for video monitoring, the following factors shall be taken into consideration:</p> <ol data-bbox="256 967 1442 1505" 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 facilities physical plan (including 'blind spots' or areas where staff and inmates/detainees may be isolated;</li> <li>6. The composition of the inmate/detainee population;</li> <li>7. The number and placement of supervisory staff;</li> <li>8. Institutional 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="256 1541 1471 1827">The facility provided and the auditor reviewed the 2022, 2021 and 2020 14-02 Staffing Plan review and saw that the facility assessed, determined, and documented whether adjustments are needed to the staffing plan, whether adjustments are needed to prevailing staffing patterns, whether adjustments are needed to the facility's deployment of video monitoring systems and other monitoring technologies, and whether adjustments are needed to the resources the facility has available to commit in order to ensure adequate staffing levels.</p> <p data-bbox="256 1877 1474 2033">(b) Policy 14-02 Sexual Abuse Prevention and Response states the PREA Compliance Manager shall document and describe the deviation on the 5-1B Notice to Administration, along with a thorough justification for the deviation and description of any corrective actions that were taken to resolve the deviation.</p>

During the audit review period, the facility stated that there has been no instances in which they were required to deviate from the staffing plan.

(c) Policy 14-02 Sexual Abuse Prevention and Response states that following consultation with the facility staff, the FSC PREA Coordinator shall assess, determine, and document whether adjustments are needed to:

- The staffing plan established pursuant to this section;
- The facility's deployment of video monitoring systems and other monitoring systems and other monitoring technologies; and
- The resources the facility has available to commit to ensure adherence to the staff plan.

The respective Business Unit Vice President/designee shall approve the Annual Staffing plan Assessment. Any changes to policy and/or procedure, physical plant, approved capital expenditures, video monitoring and/or technology, or staffing require approval of the respective Business Unit Vice President.

The facility provided and the auditor reviewed the 2021 and 2022 14-02I Staffing Plan review and saw that the facility assessed, determined, and documented whether adjustments are needed to the staffing plan, whether adjustments are needed to prevailing staffing patterns, whether adjustments are needed to the facility's deployment of video monitoring systems and other monitoring technologies, and whether adjustments are needed to the resources the facility has available to commit in order to ensure adequate staffing levels.

(d) Policy 14-02 Sexual Abuse Prevention and Response states that employees shall be prohibited from altering other employees that supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility.

The facility indicated that there were no instances in which they deviated from the staffing plan during the review period. While on site, supervisors and the PCM indicated that they were aware of the requirements and process to document and report this.

The auditor was provided a list of the cameras at the facility, and while onsite, the auditor review the camera angles, function and discussed with staff who have access. The auditor randomly selected various log books while in units/pods and reviewed the documentation of the staff documented the unannounced rounds.

Documents Reviewed, Interviews Conducted, and Observations that helped the Auditor reach finding:

Prisons and Jails PREA Standards Compliance Checklist

Policy 14-02, Sexual Abuse Prevention and Response

14-2, Annual PREA Staffing Plan Assessment



Supervisor Interviews

PCM interview

Walkthrough of physical Plant

Review of Cameras

Physical Plant Diagram

Staffing Plan

Log Books

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 264 560 297"><b>Auditor Discussion</b></p> <p data-bbox="256 338 1476 748">(a) (b) (c) Policy 18-2, Classification and Inmate/Detainee Management states in the section for housing considerations that in accordance with PREA 115.14 (a)(b) (c), a youthful offender shall not be placed in a housing unit in which the youthful inmate will have sight, sound, or physical contact with any adult inmate through the use of a shared dayroom or other common space, shower area, or sleeping quarters. Agencies shall make best efforts to avoid placing youthful inmates in isolation to comply with this provision. In areas outside of housing units, agencies shall either: (1) maintain sight and sound separation between youthful inmates and adult inmates, or (2) provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact.</p> <p data-bbox="256 786 1458 904">Further, policy states that in accordance with PREA 115.14 (c), absent exigent circumstances, agencies shall not deny youthful inmates daily large muscle exercise and any legally required special education services to comply with this provision.</p> <p data-bbox="256 913 1465 987">Youthful inmates shall also have access to other programs and work opportunities to the extent possible.</p> <p data-bbox="256 1039 1469 1158">The facility advised the auditor, in writing, that no youthful offenders are housed at this facility. The auditor requested and was provided a roster of all inmates with their dates of birth and verified that there were no youthful offenders.</p> <p data-bbox="256 1234 1437 1308">Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:</p> <p data-bbox="256 1346 1034 1379">Prisons and Jails PREA Standards Compliance Checklist</p> <p data-bbox="256 1420 1007 1453">Policy 14-02, Sexual Abuse Prevention and Response</p> <p data-bbox="256 1494 651 1527">Roster of Inmates with DOB</p> <p data-bbox="256 1568 778 1601">Interviews with Warden, PC and PCM</p> <p data-bbox="256 1641 552 1675">Interviews with Staff</p>

<b>115.15</b>	<b>Limits to cross-gender viewing and searches</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>(a) Policy 14-02, Sexual Abuse Prevention and Response states that cross gender inmate/detainee strip searches shall not be conducted except in exigent circumstances (that is, temporary unforeseen circumstances that require immediate action in order to combat a threat to security or institutional order) or when performed by medical practitioners.</p> <p>Policy 9-5, Searches of Inmate and Various Locations states that body cavity searches are not authorized at CoreCivic facilities and will not be conducted by CoreCivic personnel without the prior approval of the Vice President, Operations.</p> <p>Policy 9-5, Searches of Inmate and Various Locations states that the strip search shall be conducted by employees of the same sex as the inmate/detainee being searched except in temporary unforeseen circumstances that require immediate action to combat a threat to the security or institutional order of a facility. Any occurrence of such cross-gender strip searches shall be documented in the 5-1 Incident Report administration process using form 5-1B Notice to administration. Security staff shall be trained on how to conduct cross-gender strip searches.</p> <p>(b) The provision is not applicable, as the rated capacity does exceed 50 inmates.</p> <p>(c) Policy 9-5, Searches of Inmates/Inmates and Various Locations states that strip searches based on Reasonable Suspicion are to be documented as follows:</p> <ul style="list-style-type: none"> <li>· Date and time of the search;</li> <li>· Person authorizing the search;</li> <li>· Person or persons conducting the search;</li> <li>· Whether anal area was inspected;</li> <li>· Whether any body cavity was searched; Reason for search; and Results of the search.</li> </ul> <p>(d) Policy 14-02, Sexual Abuse Prevention and Response states that inmates/ detainees may shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttock, or genitalia, except in exigent circumstances (that is, temporary unforeseen circumstances that require immediate action in order to combat a threat to security or institutional order) or when such viewing is incidental to routine living quarter checks.</p> <p>Policy continues to state that employees of the opposite gender must announce their presence when entering an area where inmates/detainee are likely to be showering, performing bodily function or changing clothing.</p> <p>(e) Policy 14-02, Sexual Abuse Prevention and Response states that searches or</p>

physical examination of a transgender or intersex inmate/detainees for the sole purpose of determining the inmates/detainee's genital status is prohibited. If the inmate/detainee's genital status is unknown, it may be determined during conversations with the inmate/detainee, 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.

Policy 9-5, Searches of Inmate and Various Locations states that searches or physical examination of a transgender or intersex inmate/detainee for the sole purpose of determining the inmates/detainee's genital characteristics is prohibited. Security staff shall be trained in how to conduct searches of transgender and intersex inmates.

(f) Policy 14-02, Sexual Abuse Prevention and Response states that in addition to the general training provided to all employees, security staff shall receive training in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates/detainees, in a manner that is professional, respectful, and the least intrusive possible while being consistent with security needs.

Procedure in this policy states that all searched shall be conducted in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs and policy, including officer safety.

The CoreCivic Training Facilitators Guide for Search Procedures was reviewed by the auditor. In this guide, and referenced on slide six, the guide states that searches of transgender or intersex inmate should be conducted in accordance with the inmate's gender identity and by asking the individual to identify the staff with whom they would feel most comfortable conducting the search. Inmate who are suspected of changing their identity and/or search preferences to evade security screening procedures should be reported to supervisory personnel. Staff should never conduct a 'dual gender' pat search, i.e.: where the staff of one gender searches the top half of the inmate and the staff of the opposite gender searches the bottom half of the inmate.

The guide also states that cross gender searches and searches of transgender and intersex inmate should be conducted in a professional and respectful manner and in the least intrusive manner possible, consistent with security needs. Finally, pat searches of transgender visitors should be conducted in accordance with the gender identity of the visitor.

During the walkthrough of the facility, on the entry doors to the housing areas, signage which stated "staff of the opposite gender must announce themselves upon entry". In addition, staff announcements were observed by the auditor while on the site visit and were loud enough for inmates throughout to hear. Lastly, formal and informal interviews with staff and inmates indicated that this process occurs consistently and every time staff of the opposite gender enter the units and housing areas.

The facility indicated on the PAQ that in the past twelve months, there have been zero cross gender strip or cross gender visual body cavity searches of inmates.

Documents Reviewed, Interviews Conducted and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-2, Sexual Abuse Prevention and Response

Policy 9-5. Searches of Inmates/Residents

Lesson Plans for Various Searches

Training Curriculum

Interviews with Random and Specialized Staff

<b>115.16</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>a) Policy 14-02 Sexual Abuse Prevention and Response states that the facility shall take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the facility and agency efforts to prevent, detect and respond to respond to {sic} sexual abuse and sexual harassment. Inmates who are deaf or hard of hearing shall have access to information through simple written or oral communication. Sign language interpreters, or auxiliary aids such as a TTY that are reasonable, effective, and appropriate to the needs of the inmate shall be provided when simple written or oral communication is not effective.</p> <p>Policy goes on to state that the facility will ensure that information is effectively communicated orally, on an individual basis, to inmate with limited reading skills. In the event an inmate has difficulty understanding provided inmate and/or procedures due to intellectual deficiencies or mental health concerns, the facility will ensure that such information is effectively communicated orally to such inmates on an individual basis.</p> <p>A TDD Machine and its manual for the hearing impaired is located in the shift supervisor’s office.</p> <p>(b) Policy 14-02 Sexual Abuse Prevention and Response states that the facility shall take reasonable steps to ensure meaningful access to all aspects of the facility and agency efforts to prevent, detect, and respond to sexual abuse and sexual harassment to residents who are Limited English Proficient (LEP). Interpreters shall be provided who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.</p> <p>For those inmates/inmates who are limited English proficient with Spanish as a primary language, a flier entitled “Sexual Assault Awareness and Prevention” is available in both English and Spanish. This flier is educational and outlines the PREA education requirements to the inmate population.</p> <p>The receiving and discharge acknowledgment which included the handbook acknowledgment is also available in both English and Spanish.</p> <p>The video, called PREA: What you need to know, is available in English, Spanish and Hmong.</p> <p>The inmate handbook was provided and reviewed, with all required education materials for PREA.</p>

A contract between Language Lines Services, Inc. and CoreCivic of Tennessee, LLC. was provided to and reviewed by the auditor. The contract provides for over-the-phone services for translation and was last executed on February 17, 2019. It provides for interpretation services in over 200 languages. In addition, the facility can use LanguageLine Insight Video Interpreting which has 1 demand access in the 36 top languages, Spanish and American Sign Language interpreters available 24/7/365.

(c) Policy 14-02 Sexual Abuse Prevention and Response states that inmates will not be relied upon to provide interpretation services, act as readers, or provide other types of communication assistance, except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's/inmates safety, the performance of first-responder duties, or the investigation of the inmate's allegations.

In the past twelve (12) months, the facility indicated that there were no instances where inmate interpreters, readers or other types of inmate assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the inmate's safety.

An interview with CoreCivic Vice President, Operations Administration was conducted, and he indicated that the CoreCivic corporate office aids facilities that enable them to locate potential vendors and/or agencies that would provide support services for inmates/inmates with disabilities. The agency maintains a comprehensive contract with the Language Line and some when have an MOU with organizations in the local communicates to provide translation services when needed. TTY phones are provided, and arrangements are also made to assist those inmates/inmates who are blind.

At the time of the audit, there were no inmates who were blind, with low vision, deaf or with cognitive deficits. MH staff would be used to assist in reading to inmates, should an inmate need help understanding the materials or have reading or vision difficulties. The auditor selected two inmates who spoke other languages and conducted interviews with them, utilizing the language line. In each instance, the auditor had a unit staff member call the line, in an effort to ensure they understood the process and could locate the number and in each instance, it worked and the line was used to conduct the interview.

While onsite, the auditor selected two inmates to interview who could possibly need the assistance of the language line (they each did speak some English). The auditor took these inmates into a secure and private office, and asked the unit staff and officer assigned to those areas to call the line for its use. Each was able to immediately find the flier with the access code and we together called the line and used it for its services to conduct the interviews.

Informal and formal interviews with staff indicated that they were aware of this service and how to access this line.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

<p>PREA Standards Compliance Checklist Policy 14-02 Sexual Abuse Prevention and Response Sexual Assault Awareness and Prevention Brochure (English and Spanish) Inmate Handbook Language Line contract and flier Video PREA: What you need to know Interview with Inmate with use of the Language Line Interview with CoreCivic Vice President, Operations Administration Handbook for those with limited vision Use of Language Line with Inmate Random Staff Interviews Memo</p>
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**115.17 Hiring and promotion decisions**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

(a) Policy 14-02 Sexual Abuse Prevention and Response states that to the extent permitted by law, CoreCivic will decline to hire or promote anyone who may have contact with inmates/inmates and decline to enlist the services of any contractor who may have contact with inmates/inmates who:

1. has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 USC 1997);
2. has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, coercion or if the victim did not consent or was unable to consent or refuse; and
3. has been civilly or administratively adjudicated to have engaged in the activity as outlined above.

The 14-2H, Self-Declaration of Sexual Abuse/Sexual Harassment form, which is signed by every employee, asks each employee if they have ever with the three above questions, and in addition, asks if they have ever had a substantiated allegation of sexual harassment made against them.

(b) Policy 14-02 Sexual Abuse Prevention and Response states any incident of sexual harassment shall be considered in determining whether to hire or promote any individual, or to enlist the services of any contractor, who may have contact with inmates.

Policy 14-02 Sexual Abuse Prevention and Response states that before hiring new employees who may have contact with inmates/inmates, CoreCivic shall:

1. perform a criminal background records check; and
2. consistent with federal, state and local law make its best effort 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 as defined by this policy. The 3-20-2A Verification of Employment form shall be used to solicit such prior employment information.

Form 3-20-2B PREA Questionnaire for Prior Institutional Employers was reviewed. It is signed by all prospective hires and is a release of information to be sent to all prior institutions that the person may have worked at. HR staff interviewed and walked the auditor through their process of this form and the use of the information in consideration during the hiring process.

The authorization for security clearance form states 'I understand omission of any item may result in not receiving full consideration for employment'. This form is signed by every applicant.

(d) Policy 14-02 Sexual Abuse Prevention and Response states that CoreCivic in partnership with their oversight agencies shall also perform a criminal backgrounds records check before enlisting the services of any unescorted contractor who may have contact with inmates/detainees.

(e) Policy 14-02 Sexual Abuse Prevention and Response states that CoreCivic shall ensure that criminal history record checks are conducted at least every five years for current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information.

(f) Policy 14-02 Sexual Abuse Prevention and Response states that all applicants and employees and contractors who may have direct contact with inmates/inmates shall be asked about previous misconduct, as outlined above, in written applications and in any interviews or written self-evaluations conducted as part of reviews of current employees.

Form 14-2H is a self-declaration of Sexual Abuse/Sexual Harassment signed by current employees and contractors on an annual basis to serve as verification of the fulfillment of his/her continuing affirmative duty to disclose any sexual misconduct as part of an annual review process.

The form entitled 'self-declaration of sexual abuse/sexual harassment' states that "you certify your understanding that if you provide false or fraudulent information you could be disqualified from further consideration for employment or, if falsity is discovered after you have become employees, terminated from employment". This form is signed by each applicant, employee and unescorted contractor.

(d) Policy 14-02 Sexual Abuse Prevention and Response states that to the extent permitted by law, CoreCivic may decline to hire or promote and may terminate employment based on material omissions regarding such misconduct, or the provision of materially false information.

(e) Policy 14-02 Sexual Abuse Prevention and Response states that unless prohibited by law, CoreCivic shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.

A roster of all facility staff was provided to the auditor which included 221 staff in total. Twenty-four employee names were selected to be reviewed by the auditor, at random, from various shifts, ranks and positions, custody and non-custody. Each staff member must sign a self-declaration of sexual abuse/sexual harassment. This is

completed on CoreCivic, Form 14-2H. Lastly, the HR department contacts each prior institutional employer to inquire if the employee has been involved in any substantiated PREA related matters or if they resigned while an investigation was pending, completed on form 3-20-2A. Each form is done upon hire, transfer or promotion.

The Chaplain coordinates all volunteer training and clearances. An interview was held with the Chaplain while onsite. A list of all approved volunteers was provided to the auditor. Of these nine on the list, the auditor selected one and was provided and demonstrated that they received background checks and clearances that were ran through the USMS process for all employees.

(d) and (e): During an interview with the Human Resource Manager, the auditor was provided a list of the current twenty-four (24) contractors who are currently at the facility. The HR Manager stated that these workers are in medical and food service and each go through the same hiring process as all other staff. For each contractor, HR provided their clearance form demonstrating that each was cleared. These are maintained in a file in HR for each contractor.

The auditor randomly selected two of these contracted staff members, one from food service and one from medical and HR provided their background checks and hiring packets, which demonstrated compliance with this standard.

The Human Resource Manager detailed the process for newly hired staff, promotions, transfers and contract staff. In addition, a blanket packet of each type of paperwork was provided to the auditor.

For new hires, they complete, in part: Fingerprint Employee Information Sheet, Previous Employment Sheet, Privacy Rights, Criminal History Request, Self-Declaration of Domestic Violence Conviction, Self-Declaration of Sexual Abuse/Sexual Harassment, Background Investigation Disclosure and Authorization Form, New Hire Information, and Testing and Consent Form.

For promotions, staff complete: Job description acknowledgement, Self-Declaration of Sexual Abuse/Sexual Harassment, and personal relationships disclosure.

For all staff/contractors annually: Employee information update, Privacy Rights, Criminal History Request, Self-Declaration of Domestic Violence Conviction, Self-Declaration of Sexual Abuse/Sexual Harassment, Background Investigation Disclosure and Authorization Form and Fingerprint Employee information Sheet.

While interviewing the HR manager, she discussed the process for prior institutional checks, both those she sent out and those that come in from other facilities. She provided samples to the auditor while onsite and walked through how she completed and the intent of the form.

In addition, the HR staff detailed the five year background check packet and process. The auditor selected three staff, while interviewing, who have been at the facility more than five years. The HR staff were able to immediately provide the auditor,

from the HR files, the final approval letter for their five year re-investigation (each staff actually dated back 10 years or more and had two or three background re-investigations).

The Guidesheet for Standard 85P forms was provided to the auditor to review, which is completed by all, as all positions are considered public trust positions. This is completed upon initial hire and every five years.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

New Hire Paperwork Samples

Promotion Paperwork Sample

14-02H

Self-Disclosure/Declarations From

Final Approvals

Background Investigation Disclosure and Authorization Form

Interviews with PCM, PC, HR Staff, Volunteer Coordinator

<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<p data-bbox="256 188 986 221"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 560 297"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1445 456">(a) The facility indicated to the auditor by memo and during discussions that during the past twelve (12) months, there have been no substantial expansions or modifications to the facility.</p> <p data-bbox="256 508 1450 745">Policy 14-02 Sexual Abuse Prevention and Response states that when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, CoreCivic will consider the effect of the design, acquisition, expansion, or modification on the company’s ability to protect inmates from sexual abuse. Such considerations shall be documented on form 7-1B PREA Physical Plant Considerations.</p> <p data-bbox="256 797 1465 913">A blank copy of form 7-1B PREA Physical Plant Considerations was reviewed by the auditor. The form prompts the reviewer to consider the elements of the standard and document concerns or considerations.</p> <p data-bbox="256 965 1469 1167">(b) Policy 14-02 Sexual Abuse Prevention and Response states that when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, CoreCivic will consider how much technology may enhance the ability to protect inmates/inmate from sexual abuse. Such considerations shall be documented on form 7-1B PREA Physical Plant Considerations.</p> <p data-bbox="256 1218 1465 1335">A blank copy of form 7-1B PREA Physical Plant Considerations was reviewed by the auditor. The form prompts the reviewer to consider the elements of the standard and document concerns or considerations.</p> <p data-bbox="256 1373 1477 1865">The CoreCivic Vice President of Operations Administration states that CoreCivic employs architects and other professionals who through experience, research and consulting have knowledge of the issues and needs presented by PREA. On new builds and renovations, the design staff will consult with the PREA coordinator for recommendation and work to ensure that PREA is addressed. Real estate and design staff receive information from the field on privacy concerns in areas such as showers, restrooms, and any areas where inmates/detainees may be in a state of undress. Blind spots are identified that can be corrected through video surveillance coverage. During acquisitions, the staff making the site visits develop a preliminary assessment and the PREA coordinator is involved in the review of physical plant issues. At existing facilities, a form 7-1B (PREA Physical Plant Considerations) issued to ensure PREA I considered when initiating a renovation/new construction.</p> <p data-bbox="256 1946 1461 2063">In addition, the VP states that cameras are used to support direct/indirect staff supervision. Better quality systems have been installed and consideration to optimal coverage is addressed at the time of these upgrades. Camera placement also takes</p>

into consideration the privacy needs for cross gender viewing in areas like restrooms and shower areas. Technology is also discussed with the facility during the PREA Staffing Plan assessment that is reviewed each year by facility staff and the FSC PREA coordinator.

The auditor completed a walkthrough of all facility grounds and saw cameras in place throughout the facility. In numerous locations, the auditor sat with staff to review all camera angles. In addition, the auditor was provided a printout of all cameras. There has not been a camera or building upgrades since the previous audit. Each camera allowed for coverage and aimed to eliminate blind spots. No cameras were seen to have viewed of restrooms or shower areas.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-02 Sexual Abuse Prevention and Response

Policy 7-01B Form for plant physical assessment and improvement

Interview with PC

Interview with PCM

Facility Walk through

Interview with Agency Head

List of all facility cameras

<b>115.21</b>	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>(a) CoreCivic Policy 14-02 Sexual Abuse Prevention and Response states that the investigating entity shall follow a uniform evidence protocol that maximize the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.</p> <p>Further, CoreCivic policy 13-79 Sexual Assault Response states that upon receiving notice of an alleged RAPE that occurred within the previous seventy-two (72) hours, QHCP will examine the patient inmate/inmate utilizing the 13-79A Rape/Sexual Assault Protocol and will arrange for the patient inmate/inmate to be transported to the local designated Emergency Room (ER) for examination, evidence collection, and prophylaxis treatment for sexually transmitted disease.</p> <p>(b) The Nye County Sheriff's Department conducts the criminal sexual abuse investigations at the facility. An MOU was entered into for these investigation and was executed in 2017. The protocol outlined by the facility and in documentation has been adapted from and is based on the most recent edition of the US Department of Justice's Office on Violence Against Woman publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents".</p> <p>CoreCivic Policy 14-02 Sexual Abuse Prevention and Response states that an as appropriate, it shall be adapted from or otherwise based on the most recent editions of the Department of Justice's Office on Violence Against Woman publication "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocol developed after 2011.</p> <p>(c) According to the PAQ, there were no SANE exams conducted during the review period.</p> <p>(d) (e) A Memorandum of Understanding between CoreCivic and the Community Acton Against Rape was reviewed and states that will, if requested by the victim, allow a victim advocate to accompany and support the victim through the forensic medical examination process and investigator interviews, and provide emotional support, crisis intervention, information and referrals. This was signed in 2016.</p> <p>Further, CoreCivic Policy 14-02 Sexual Abuse Prevention and Response states that the facility shall offer all victims of sexual abuse access to forensic medical exams, where evidentiarily or medically appropriate. The PCM, Facility Investigator or ADO shall consult with law enforcement prior to transporting an inmate for an examination to be performed by a SAFE or SANE. If it is determined that examination is necessary for the collection of evidence, then the facility shall transport the alleged victim. If a SAFE/SANE provider is not available, the examination may be performed by other</p>

qualified medical practitioners.

(f) CoreCivic Policy 14-02 Sexual Abuse Prevention and Response states that investigations conducted by a facility employee for allegations of sexual abuse will be handled in accordance with the Code of Federal Regulations, Title 28, Part 115.21, Evidence Protocol and Forensic Medical Examinations, as outlined below. If the facility is not responsible for investigating such allegations, the facility shall request that the responsible outside agency or entity (i.e. state or local law enforcement, contracting agency, etc) comply with these regulations.

(g) Auditor is not required to audit this provision.

(h) Policy states that if unable to secure services of a victim advocate to accompany the alleged victim to the SAFE/SANE exam, and if requested by the victim, the facility may use a qualified facility staff member for this purpose. The staff member must have been screened by SART and the Warden for appropriateness to serve in the role and must have received documented education concerning sexual assault and forensic examination issues.

An advocate was called from the inmate phone in a unit and, as well, by the auditor prior to arriving onsite. They described their processes and involvements with the facility and protocol should an incident occur.

Administrative Investigations are completed onsite by CoreCivic Staff.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-02 Sexual Abuse Prevention and Response

Policy 13-79 Sexual Assault Response with 13-17A Sexual Assault Protocol

Investigation Outline and Protocol

Sample Incident Report

Uniform Evidence Protocol

A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/  
Adolescents

Interview with PCM, Advocates, custody staff, PC



<b>115.22</b>	<b>Policies to ensure referrals of allegations for investigations</b>
	<p data-bbox="256 188 983 221"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 557 297"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1481 582">(a) Policy 14-02 Sexual Abuse Prevention and Response states that the Administrator/ Director shall immediately report all allegations of sexual abuse, sexual assault and sexual harassment to a law enforcement agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior or the allegation would be not be {sic} considered a criminal act under federal, state or local law.</p> <p data-bbox="256 633 1458 875">Policy 5-1, Incident Reporting, states that when an allegation that a Priority PREA incident has occurred, a 5-1E PREA Reporting form will be initiated. Upon completion of the investigation, the 5-14E will be used to document the act as substantiated, unsubstantiated or unfounded. In the event the act is substantiated, any sanctions must be documented on the 5-1E. Completed 5-1E forms will be maintained with the 5-1 packet.</p> <p data-bbox="256 913 1442 1028">The Nye Sheriff's Department will conduct all criminal investigations for this facility. The MOU outlines the process and requirements of this standard that NSD will utilize.</p> <p data-bbox="256 1079 1461 1238">According to the PAQ, during the twelve (12) month period prior to this audit, there were twenty-eight incidents reported of sexual abuse and sexual harassment at the facility which were investigated administratively and criminally. Fifteen of these were potentially criminal and forwarded to criminal investigators.</p> <p data-bbox="256 1290 1477 1449">(b) Policy 14-02 Sexual Abuse Prevention and Response states that all allegation of sexual abuse or sexual harassment shall be referred for investigation to an agency or entity with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior.</p> <p data-bbox="256 1500 1461 1574">This information is readily available on the CoreCivic Prison Rape Elimination website with links to policy and the standards.</p> <p data-bbox="256 1612 1477 1899">(c) Policy 14-02 Sexual Abuse Prevention and Response states that whenever feasible, the facility shall enter an MOU with the outside investigating agency or entity outlining the roles and responsibilities of both the facility and the investigating entity in performing sexual abuse investigations. Before developing or attempting to enter an MOU, the facility shall contact the FSC Assistant General Counsel, Vendor Contracts. CoreCivic shall maintain copies of agreements or documentation showing attempts to enter into such agreements.</p> <p data-bbox="256 1951 1430 2065">(d) Criminal investigations shall be documented in a written report that contains a thorough description of physical testimonial and documentary evidence and that includes copies of all documentary evidence where feasible.</p>

During an interview with the CoreCivic Vice President, Operations Administration, he stated that it is policy to refer all allegations of sexual abuse that are criminal in nature to law enforcement agencies with the legal authority to conduct criminal investigations. All administrative investigations are conducted by CoreCivic investigators who have received the specialized PREA training and/or law enforcement officials. In addition, the VP stated that all allegations are reported in the CoreCivic Incident Reporting Database (IRD) system which triggers an investigation. This system requires multiple levels of administrative oversight and review. All allegations that could result, if substantiated, in criminal violations are referred to the appropriate law enforcement officials (or by contracted partner investigative entity). Our staff works with the outside law enforcement, upon request.

Incident Report logs were sent to the auditor to review. There were twenty-one in year preceding and the auditor selected eleven to review.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-02 Sexual Abuse Prevention and Response

Policy 5-1, Incident Reporting

CoreCivic PREA Statement

PREA Allegation Log

PREA Allegation Administrative Investigation

CoreCivic Website

Interview with Specialized Staff

Interview with PREA Compliance Manager

Interview with PREA Coordinator

Interview with CoreCivic Vice President, Operations Administration

<b>115.31</b>	<b>Employee training</b>
	<p data-bbox="256 188 983 224"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 558 300"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1461 667">(a) Policy 14-02 Sexual Abuse Prevention and Response states that CoreCivic has mandated zero-tolerance towards all forms of sexual abuse and sexual harassment. In addition, it states that all CoreCivic facility employees shall receive training on CoreCivic’s zero-tolerance policy for sexual abuse and sexual harassment. Such training shall be tailored to the gender of the inmates/inmates at the facility and at a minimum, all employees shall receive pre-service and annual in-service training on the PREA National Standards and other applicable state or local laws imposing criminal liability for the sexual abuse of a person held in custody.</p> <p data-bbox="256 716 1046 752">Further, policy states that employees will be trained on:</p> <ol data-bbox="256 801 1433 1644" style="list-style-type: none"> <li>1. PREA National Standards and other applicable state or local laws imposing criminal liability for the sexual abuse of a person held in custody;</li> <li>2. An employee’s duty to report any occurrence of sexual harassment or sexual abuse;</li> <li>3. How to fulfill employee responsibilities for sexual abuse/sexual harassment prevention, detection, reporting, and response in accordance with this policy;</li> <li>4. The right of inmates to be free from sexual abuse and sexual harassment;</li> <li>5. The right of inmates/inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment;</li> <li>6. The dynamics of sexual abuse and sexual harassment in confinement;</li> <li>7. Locations, situations, and circumstances in which sexual abuse may occur;</li> <li>8. The common reaction of sexual abuse and sexual harassment victims;</li> <li>9. Signs of victimization;</li> <li>10. How to detect and respond to signs of threatened or actual sexual abuse;</li> <li>11. How to avoid inappropriate relationships with inmates/inmates;</li> <li>12. How to communicate effectively and professionally with inmates/inmate, including LGBTI and Gender Non-Conforming inmates/inmates; and</li> <li>13. How to comply with laws relevant to mandatory reporting of sexual abuse to outside authorities.</li> </ol> <p data-bbox="256 1693 1433 1774">The CoreCivic PREA Overview class and participant Guide was reviewed. The guide included all elements listed above, in the standard and in policy.</p> <p data-bbox="256 1814 1471 1966">(b) Policy 14-02 Sexual Abuse Prevention and Response states that employees transferring to a facility that houses a population whose gender is different from their previous facility, shall receive additional training specific to the population of the newly assigned facility.</p> <p data-bbox="256 2016 1407 2051">(c) Policy 14-02 Sexual Abuse Prevention and Response states that all CoreCivic</p>

facility employees shall receive training on CoreCivic's zero-tolerance policy for sexual abuse and sexual harassment. Such training shall be tailored to the gender of the inmates/inmates at the facility and at a minimum, all employees shall receive preservices and annual in-services training on the PREA National Standards and other applicable state or local laws imposing criminal liability for the sexual abuse of a person held in custody.

The facility provided the auditor with an employee roster listing all current staff, position name and date of hire.

A roster of all facility staff was provided to the auditor which included 221 staff in total. Thirty employee names were selected to be reviewed by the auditor, at random, from various shifts, ranks and positions, custody and non-custody. The auditor reviewed staff training acknowledgment forms for signature. In addition, in 2021, the facility switched to electronic signature when the training is administered online. IT provided a video demonstration, showing that staff had to verify receipt, acknowledgment and understanding of the training received. Staff must select this option prior to completing the training and the training showing complete on their roster in the training management system.

(d) Policy 14-02 Sexual Abuse Prevention and Response states that employees shall be required to confirm, by either electronic or manual signature, their understanding of the received training. Signed documentation will be maintained in the employees training file.

1. Staff were trained on the aforementioned elements included in provisions of this standard;
2. Staff signed an acknowledgment that they understood the training that they received;
3. Staff were trained prior to their start date and contact with the population;
4. Those employees that have been at the facility for over one year, receive this training and sign the acknowledgment annually.

Lastly, Policy 4-1 Staff Development and Training states that Orientation and/or Custody training shall be scheduled so that all training is completed before the staff member may work with inmates.

A roster of all facility staff was provided to the auditor which included 221 staff in total. Thirty employee names were selected to be reviewed by the auditor, at random, from various shifts, ranks and positions, custody and non-custody. The auditor reviewed staff training acknowledgment forms for signature. In addition, in 2021, the facility switched to electronic signature when the training is administered online. IT provided a video demonstration, showing that staff had to verify receipt, acknowledgment and understanding of the training received. Staff must select this option prior to completing the training and the training showing complete on their roster in the training management system.

While interviewing the training manager, she discussed the in-service and pre-service training calendar which included PREA Training. She provided copies to the auditor to review.

The auditor selected 49 inmate files to review and of these, all were compliant with the education requirements (absent three that were late prior to October 2022 when the process was changed for comprehensive education).

Documents Reviewed, Interviews Conducted and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-02, Sexual Abuse Prevention and Response

Policy 4-1, Staff Development and Training

Training Policy

PREA Overview, Participant Guide for Training

PREA Training Lesson Plan

CoreCivic PREA policy Acknowledgement

Staff Roster

In-Service Training Records

Random Staff Interviews

HR Files

Training Files

Discussion with training and HR Staff

Interview with PCM, HR, Training, Random and Specialized Staff

<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 262 560 293"><b>Auditor Discussion</b></p> <p data-bbox="256 338 1458 499">(a) Policy 14-02 Sexual Abuse Prevention and Response states that all civilians/ volunteers/contractors who have contact with inmates/inmates shall receive training on their responsibilities pertaining to sexual abuse and sexual harassment prevention, detection, reporting and response as outlined in this policy.</p> <p data-bbox="256 551 1477 786">Each volunteer receives a manual that of which covers sexual abuse and sexual harassment, policy 14-2. The manual was provided to the auditor to review and includes: the various definitions of acts from PREA and Policy 14-2, sexual abuse awareness, zero-tolerance policy, safety, PREA requirements, reporting by inmates, and reporting to staff. They also receive the handout entitled PREA Overview: Training for Contractors and Volunteers.</p> <p data-bbox="256 842 1481 1077">(b) Policy 14-02 Sexual Abuse Prevention and Response states that the level and type of training provided to volunteers/contractors shall be based on the services they provide and level of contact they have with inmates/detainees. All Volunteers and contractors who have contact with inmates shall acknowledge the CoreCivic zero tolerance policy regarding sexual abuse and sexual harassment and information on how to report such incidents.</p> <p data-bbox="256 1133 1433 1205">The facility provided the auditor with a list of all contract staff or contractors at the facility. All work in food service and the medical departments.</p> <p data-bbox="256 1261 1481 1709">Each volunteer and contract worker signs the 14-2 A CoreCivic PREA Policy Acknowledgement and/or Training Acknowledgment Form and a Volunteer Agreement, 22-1B Form. The training acknowledgement section, which is signed and dated by employee, states: I have listened to the instructors, viewed all video presentations, read all handouts, and I understand the training that I have received. I understand that as an employee, volunteer/contractor it is my responsibility to abide by policy and procedures as directed in the training. If I have questions about the training material presented, or policy/procedures I am aware that it is my responsibly to seek clarification from the class instructor, to my supervisor, the Learning and Development Manager, or the PCM. Five (5) signed samples of this form were provided to/reviewed by the auditor.</p> <p data-bbox="256 1765 1481 1921">(c) Policy 14-02 Sexual Abuse Prevention and Response states that each volunteer or contractor understands the training that he/she has received will be kept in the volunteer or contractors file by either the Learning Development Manager, facility Volunteer Coordinator or other staff designated by the Warden or PCM.</p> <p data-bbox="256 1977 1433 2089">The Chaplain coordinates all volunteer training. An interview was held with the Chaplain while onsite. A list of all approved volunteers was provided to the auditor. Of these, four were randomly selected and the auditor requested verification that</p>

they received training. Each of these signed a Self-Declaration of sexual abuse/harassment, Application for Service as a volunteer, and a criminal history request form. On this form, it stated that they understand and reviewed the PREA Implementation and Compliance Policy, the PREA Screening, Classification, Education and Monitoring Policy, and the PREA Allegations, Investigations and Sexual Response Teams Policy. In addition, a FormStack print-out is in there file showing that they completed the online PREA Course. In addition, each was given and signed a 14-2 J and K, which is a CoreCivic form which provides information on the PREA standards, Prevention, detection and response information, and is required to be signed. A volunteer Code of Ethics is also signed, form 22-1. Of the five selected from the Chaplains list of nine current volunteers, the Chaplain and training department were able to immediately provide the complete file, including all mentioned herein. In addition, an approval background check packet was included for one of those selected.

One volunteer was interviewed while onsite. She recalled the training provided, the background check process, and was aware of the zero-tolerance policy and how to report. Lastly, she expressed that security staff were excellent to work with and she feels they would take her seriously if she had concerns. Informally, three volunteers where also spoken with while the auditor was onsite, as they had all just arrived together. Each said the staff were wonderful, they felt safe at this facility, knew how to report, and that they were trained prior to starting.

An interview was also held with the HR Manager and the same packet was provided and described, as above, as being needed for each volunteer and contractor.

HR provided a list of contract staff to the auditor, of which samples were selected to ensure they had completed the required training. Each selected had documentation of the required training.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-02 Sexual Abuse Prevention and Response

22-1B, 22-1 C, Volunteer Agreement and Code of Conduct

PREA Overview, Training for Contractors and Volunteers,14-2K

PREA Overview PowerPoint

Volunteer Manual

List of Contractors

Volunteer Application Form

Self-declaration of Sexual Abuse/Sexual Harassment

Volunteer Acknowledgement of PREA training

Volunteer List with Organization and start date

Live Scan Background Clearance Documentation for selected volunteers and contractors

	<p>Volunteer Right to Know form, signed by volunteers</p> <p>Interview with Director</p> <p>Interview with Volunteer Coordinator (Program Supervisor)</p> <p>Interview with Volunteer</p> <p>Volunteer Clearance</p> <p>Inquiry with Front Desk Staff</p> <p>Contract staff file</p> <p>Memo</p>
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**115.33****Inmate education**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

(a) Policy 14-02 Sexual Abuse Prevention and Response states upon arrival at the facility, all inmates shall be provided written information regarding sexual abuse prevention and reporting. Inmates shall receive comprehensive educational information about the following topics related to this policy within thirty (30) days of intake either in person or through video:

1. CoreCivic's zero tolerance policy regarding sexual abuse and sexual harassment;
2. How to report incidents, threats or suspicions of sexual abuse or sexual harassment;
3. An inmates/detainees right to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents;
4. Availability of policies regarding sexual abuse prevention/intervention;
5. Employee-on-inmate/detainee sexual abuse;
6. Self-protection from sexual abuse;
7. Inmate on inmate sexual abuse;
8. Available emotional support services to include internal and external victim advocates and community support services.

Further, policy 14-02 states that inmates/inmates will be provided education in formats accessible to all inmates, including those who are limited English proficient or disabled.

During the past twelve (12) months, there has been 1,934 inmates/inmates admitted to the facility who have reviewed and received the education materials.

(b) Policy 14-02 Sexual Abuse Prevention and Response states that within 30 days following intake, either in person or through video, inmates shall receive comprehensive educational information on the follow topics related to sexual abuse and sexual assault prevention and intervention:

1. CoreCivic's zero tolerance policy regarding sexual abuse and sexual harassment;
2. How to report incidents, threats or suspicions of sexual abuse or sexual harassment;
3. An inmates/detainees right to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents;
4. Availability of policies regarding sexual abuse prevention/intervention;
5. Employee-on-inmate/detainee sexual abuse;
6. Self-protection from sexual abuse;
7. Inmate on inmate sexual abuse;
8. Available emotional support services to include internal and external victim

advocates and community support services.

No inmates in the past twelve (12) months transferred from a different facility.

Policy 14-02 Sexual Abuse Prevention and Response also states that CoreCivic prevents discrimination based on inmate/detainees race, religion, national origin, sex, disability, or political views in making administrative decisions and in providing access to programs.

Policy 17-101, Admission, Orientations, Property control and Release states that orientation will be conducted and documented on the 17-101A Orientation Verification form for all inmates/inmates. At a minimum, orientation will include the facilities program for prevention, intervention, and remediation of sexual misconduct (PREA) – to include what constitutes sexual misconduct/sexual harassment and the consequences for participating in such activities.

(c) Policy 14-02 Sexual Abuse Prevention and Response states upon arrival at the facility, all inmates shall be provided written information regarding sexual abuse prevention and reporting. Inmates shall receive comprehensive educational information about the following topics related to this policy within thirty (30) days of intake either in person or through video:

1. CoreCivic's zero tolerance policy regarding sexual abuse and sexual harassment;
2. How to report incidents, threats or suspicions of sexual abuse or sexual harassment;
3. An inmates/detainees right to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents;
4. Availability of policies regarding sexual abuse prevention/intervention;
5. Employee-on-inmate/detainee sexual abuse;
6. Self-protection from sexual abuse;
7. Inmate on inmate sexual abuse;
8. Available emotional support services to include internal and external victim advocates and community support services.

Further, policy 14-02 states that inmates/inmates will be provided education in formats accessible to all inmates, including those who are limited English proficient or disabled.

Further, policy 14-02 states that inmates/inmates will be provided education in formats accessible to all inmates/inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as inmates/inmates who have limited reading skills.

Lastly, policy states that inmates who have been transferred from another facility shall receive intake material from the receiving facility to serve as refresher training.

(d) Policy 14-02 Sexual Abuse Prevention and Response states that the facility shall

maintain documentation of inmate/inmate participation in educational sessions pertaining to sexual abuse and sexual harassment. It also stated that inmates/detainees will be provided education in formats accessible to all inmates/detainees, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates/detainees who have limited reading skills.

Samples of the Receiving and discharge checklist were provided which have a check box indicated 'orientation video shown/PREA video shown' and signed by inmates upon intake.

(e) Policy 14-02 Sexual Abuse Prevention and Response states that inmates shall sign indicating acknowledgement that they have received intake information and the 30 day comprehensive education and this documentation shall be maintained by the facility in the inmate file.

The auditor asked for and was provided a list of inmates with their intake date into the facility, none were in the facility prior to the standards being implemented.

During the tour, the facility information for inmates to show their access to PREA related processes and policies. Next to the phones used by inmates there was education information. While all information for reporting was present, the auditor suggested that the facility make more clear, the difference between reporting and advocacy information so inmates were clear in each number and its purpose. The facility, while the auditor was still onsite, immediately correct and replaced these throughout the facility.

After a review of the selected inmate files, the auditor saw that some of the inmate files were using outdated and unclear forms for the inmate acknowledgment for education. After discussing with the PC and the QAM, the forms were edited to be more facility specific and clear and all intake and unit staff were immediately trained and signed for training on the new forms. They were also each send an email on the forms. Lastly, inmates who came into the facility the week the auditor was onsite, were immediately required to sign the new form. Documentation of all of this was provided to the auditor. It should be noted, that they facility was never not completing the education as required, the forms were just unclear as to which was initial and which was comprehensive and which items were provided at each time.

The inmate handbook was provided to the auditor by staff at intake and was edited immediately for a few clarifying suggestions made by the auditor. New handbooks for the ICE and USMS populations were provided and reviewed by auditor and were printed and redistributed.

With two inmates who speak alternate language, the auditor took the inmates into a private room and asked staff assigned to the area to call the phone number for services. The staff were immediately able to provide the information and the line was used for the interview. Staff indicated that should the inmate need privacy, such as with a legal call, they would allow for that from staff phones, which are unrecorded or

monitored.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-2, Sexual Abuse Prevention and Response

Inmate Handbook

Inmate Acknowledgement Form

Sexual Assault Awareness Brochure

PREA DVD

Inmate orientation checklist

14-2A

PREA Posters

PREA Acknowledgement

Inmate Interviews, Specialized and Random

Inmate Files

Facility Walkthrough

Interview with Intake Staff

Interview with Counselors

Interview with PCM

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>(a) Policy 14-02 Sexual Abuse Prevention and Response states that in addition to the general training provided to all employees and to the extent that CoreCivic conducts sexual abuse investigations, investigators shall receive training in conducting sexual abuse investigations in confinement settings. The PCM shall ensure that more than one (1) person at the facility receives training as a sexual abuse investigator. This will ensure that a trained investigator is available as backup during employee absences (e.g.) leave, paid time off, sickness, offsite training, etc) from work.</p> <p>The facility provided a Certificate of Completion for the one (1) assigned facility investigator. The certificate is from a training entitled PREA: Investigating Sexual Abuse in a Confinement Setting which was delivered online through the Moss Group. In addition, CoreCivic held a webinar training entitled “PREA Update, Investigation Standards and Required Specialty Training”.</p> <p>(b) Policy 14-02 Sexual Abuse Prevention and Response states that specialized investigators training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collections in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.</p> <p>Policy also states that documentation confirming that investigators have completed the required specialized training in conducting sexual abuse investigations shall be maintained in accordance with facility record retention policies.</p> <p>The curriculum for each of the two trainings was provided and reviewed by the auditor (through CoreCivic and the National Institute of Corrections and each training included the requirements of the standard and Policy 14-02: Techniques for interviewing sexual abuse victims, the proper use of Miranda and Garrity warnings, Sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.</p> <p>After leaving the facility, the Director of PREA, Investigations for CoreCivic sent the auditor a new training, slides and sign in sheet, showing that the facility investigator took this training. In this training, and among other topics, they covered the preponderance of evidence standard, proof thresholds for criminal versus administrative investigations, and other related topics.</p> <p>(c) Policy 14-02 Sexual Abuse Prevention and Response states that employees who conduct sexual abuse and sexual harassment administrative investigations are required to document completion of this training by signing the 14-2A1 PREA Training</p>

Acknowledgment Specialized Training. This documentation shall be maintained in the employee training file.

The facility provided a Certificate of Completion for the one (1) assigned investigator. This investigator was interviewed and he was able to speak of the training her received and discussed the topics in this standard.

The certificate is from a training entitled PREA: Investigating Sexual Abuse in a Confinement Setting which was delivered online through the National Institute of Corrections.

(d) Auditor is not required to audit this provision.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-02 Sexual Abuse Prevention and Response

PREA Investigator Training Attendance Rosters

Email on Training Requirements

PowerPoint titled PREA Update Investigation Standards and Required Specialty Training

Training Certificates for each investigator assigned at this facility

Training History Records

PREA Investigations Flow Chart

PREA Investigations Narrative Template

PREA Investigations Log

Investigations Chain of Command

PREA Investigation Process Chart Policy 4-1

<b>115.35</b>	<b>Specialized training: Medical and mental health care</b>
	<p data-bbox="256 188 983 221"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 557 297"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1477 499">(a) Policy 14-02 Sexual Abuse Prevention and Response states that in addition to the general training provided to all employees, all full and part-time Qualified Health Care Professionals and Qualified Mental Health Professions, who work regularly in the facility, shall receive specialized medical training as outlined below:</p> <ul data-bbox="256 551 1437 748" style="list-style-type: none"> <li>· How to detect and assess signs of sexual abuse and sexual harassment;</li> <li>· How to preserve physical evidence of sexual abuse;</li> <li>· How to respond effectively and professionally to victims of sexual abuse and sexual harassments; and</li> <li>· How and to whom to report allegations of sexual abuse and sexual harassment.</li> </ul> <p data-bbox="256 799 1477 875">The training PowerPoint was reviewed entitled PREA Specialty Training for Medical and Mental Health Staff and it included all of the above provisions and areas.</p> <p data-bbox="256 927 1355 1003">(b) The facility advised the auditor that they do not conduct forensic medical examinations at this facility.</p> <p data-bbox="256 1055 1461 1167">(c) Sample training reports for selected staff in the medical and mental health were printed and reviewed and demonstrated that documentation of these training is maintained.</p> <p data-bbox="256 1218 1477 1377">(d) Policy 14-02 Sexual Abuse Prevention and Response states that in addition to the general training provided to all employees, all full and part-time Qualified Health Care Professionals and Qualified Mental Health Professions, who work regularly in the facility, shall receive specialized medical training as outlined below:</p> <p data-bbox="256 1417 1278 1451">How to detect and assess signs of sexual abuse and sexual harassment;</p> <ul data-bbox="256 1458 1437 1619" style="list-style-type: none"> <li>· How to preserve physical evidence of sexual abuse;</li> <li>· How to respond effectively and professionally to victims of sexual abuse and sexual harassments; and</li> <li>· How and to whom to report allegations of sexual abuse and sexual harassment.</li> </ul> <p data-bbox="256 1659 1461 1899">Of the twenty-six medical/MH staff, seven were randomly selected and asked to demonstrate that they have received the specialized training. Documentation was provided to the auditor to show compliance. In addition, the facility provided a roster showing that in 2022, thirty-three medical and mental health staff completed the specialized training and that in 2023, fifteen staff have completed this training, as they complete this annually. the remaining staff and in progress and one is on leave.</p> <p data-bbox="256 1980 1430 2056">In addition, medical and mental health staff were interviewed by the auditor. They were able to recall taking the specialized training, indicated that they also take the</p>

training in annual in service with all other staff, that all other staff receive. Lastly, they were able to discuss the training and describe the requirements as per the standards.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-02 Sexual Abuse Prevention and Response

PREA Specialized Training for medical and mental health staff

Medical Staff Training Records

MH Staff Training Records

Interviews with Training Staff, MH and Medical Staff



**115.41 Screening for risk of victimization and abusiveness**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

(a) Policy 14-02 Sexual Abuse Prevention and Response states that all inmates shall be assessed during an intake screening in order to obtain information relevant to housing, cell, work, education, and program assignments. The goal is to keep separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.

(b) Policy 14-02 Sexual Abuse Prevention and Response states that inmates shall be assessed within 24 hours of arrival at a facility unless contracting agency policy authorizes 72 hours following arrival. This includes inmates who have been transferred from another facility, have been received from a reception center where an assessment may already have been completed as part of reception and inmates who have been returned from court or other leave status.

In the past twelve (12) months, a total of 5,556 inmates have gone through the intake process at the facility and have been screened for risk of victimization or abusiveness within the 72 hours upon intake.

(c) Policy 14-02 Sexual Abuse Prevention and Response states that screenings will be completed and documented using an objective screening instrument. The TDOC screening Form shall be utilized for this purpose unless the contracting agency requires usage of another form or computerizes screening process.

Policy continues to state that a list of those inmates/inmates who are identified through a screening as a victim, potential victim, predator or potential predator shall be maintained and updated as necessary by the operations manager/designee. The list shall be made available to any staff involved in the housing of inmates /inmates. Those inmates at high risk of being sexually victimized shall be separated from those at high risk of being sexual predators, to the best of our ability.

Screenings will be completed, according to policy, and documented using the Sexual Abuse Screening Tool, with referrals to Case Management staff for further evaluation and screening as necessary, unless the facility management contract requires otherwise.

(d) The Assessment Questionnaire Information includes prompts as to:

- Whether the inmate has a mental, physical, or developmental disability;
- The age of the inmate;
- The physical build of the inmate;
- Whether the inmate has previously been incarcerated;
- Whether the inmate's criminal history is exclusively nonviolent;
- Whether the inmate has prior convictions for sex offenses against an adult or

child;

- Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming (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);
- Whether the inmate has previously experienced sexual victimization;
- The inmate's own perception of vulnerability; and
- Whether the inmate is detained solely for civil immigrations purposes.

(e) The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse.

(f) Policy 14-02 Sexual Abuse Prevention and Response states that the 30-day reassessment will include any additional relevant information received by the facility since the initial intake screening. The facility will maintain a tracking system to ensure that reassessments are not completed beyond 30 days.

(g) Policy 14-02 Sexual Abuse Prevention and Response states that a reassessment shall occur when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that may impact the inmate/inmate's risk of victimization or abusiveness.

(h) Policy 14-02 Sexual Abuse Prevention and Response states that inmates/inmates may not be disciplined for refusing to answer, or for not disclosing complete information.

The facility advised the auditor that disciplinary action will not be taken for any participant who refused to answer these questions.

During the onsite visit to the facility, the auditor interviewed staff who perform the intake screening as well as staff who perform the second, 30 day screening. During interviews, the case managers interviewed stated that the Classification Manager send out list named, 14-2B 30 Day Reviews Due, spreadsheet. This lets each case manager know which inmates are due for their follow up screening. Samples from September, October and November were provided to the auditor to review.

During the onsite portion of the audit, the intake process was occurring for the auditor to observe. In addition, the auditor asked and viewed, during the facility walk through and in specialized interviews, the intake process. In addition, the auditor selected three inmates from this area who were in holding cells and conducted random inmates interviews in a room that could be used for screening (as there was numerous offices in this area). The room was private and with the door closed, the auditor was unable to hear anything going on in intake which indicated that responses are private.

In addition, an intake packet from mental health was provided to the auditor which is used when an inmate prompts it by answers to certain questions on the PREA

Screening, which included: Intake checklist, Comprehensive Clinical Record Review, Health Questionnaire, Sick Call Procedures, Problem Oriented Progress record, and Teaching Counseling Plan Document, among other medical related documents.

The auditor selected 49 inmate files to review and of these, all were compliant with the screening requirements.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-02 Sexual Abuse Prevention and Response

Policy 14-02 B Screening Tool (electronic and password protected)

30 day re-assessment example

Direction for Completion of the Sexual Abuse Screening Tool

Training/Activity Attendance Roster

Assessment Questionnaire/Information Screening Tool from inmate files

<b>115.42</b>	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 262 560 293"><b>Auditor Discussion</b></p> <p data-bbox="256 338 1481 667">(a) Policy 14-02 Sexual Abuse Prevention and Response states that upon admission to the facility, and upon transfer to another facility inmates/inmates shall be screened by staff to perform the initial intake screening process in order to obtain information relevant to housing, cell, work, education and program assignments with the goal of keeping separate those inmates/inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. The screening shall identify past victims and/or predators and assess vulnerability to sexual abuse victimization. Housing assignments are made accordingly.</p> <p data-bbox="256 719 1481 875">(b) Policy 14-02 Sexual Abuse Prevention and Response states that screening of inmates/detainees should only be used as a guideline for determining appropriate housing and services should never be used as the sole reason for the deprivation of a program or a privilege.</p> <p data-bbox="256 927 1318 1003">Each inmate is screened privately, and their housing programming and work assignments are determined on an individual basis.</p> <p data-bbox="256 1055 1481 1384">(c) Policy 14-02 Sexual Abuse Prevention and Response states that in deciding whether to house a transgender or intersex inmate/inmate in a male housing unit/area or a female housing unit/area, or when making other housing and programming assignments for such inmates/inmates, the facility shall consider the transgender or intersex inmate/inmate's own views with respect to his/her own safety and shall consider on a case-by-case basis whether such a placement would ensure the inmate/inmate's health and safety. Consideration should also be given as to whether the placement would present management or security problems.</p> <p data-bbox="256 1435 1481 1765">(d) Policy 14-02 Sexual Abuse Prevention and Response states that in deciding whether to house a transgender or intersex inmate/inmate in a male housing unit/area or a female housing unit/area, or when making other housing and programming assignments for such inmates/inmates, the facility shall consider the transgender or intersex inmate/inmate's own views with respect to his/her own safety and shall consider on a case-by-case basis whether such a placement would ensure the inmate/inmate's health and safety. Consideration should also be given as to whether the placement would present management or security problems.</p> <p data-bbox="256 1794 1481 1912">(a) Policy 14-02 Sexual Abuse Prevention and Response states that Transgender and intersex inmates/inmates shall be given the opportunity to shower separately from other inmates/inmates.</p> <p data-bbox="256 1964 1481 2083">(b) Policy 14-02 Sexual Abuse Prevention and Response states that the establishment of a unit or pod solely dedicated to the housing of LGBTI and/or Gender Non-Conforming inmates/inmates is strictly prohibited unless required by consent</p>

decree, legal settlement, or legal judgment for the purpose of protecting that inmate/ inmate.

Policy 14-02 Sexual Abuse Prevention and Response states that Transgender and intersex inmates/inmates shall be given the opportunity to shower separately from other inmates/inmates.

(c) Policy 14-02 Sexual Abuse Prevention and Response states that the establishment of a unit or a pod solely dedicated to the housing of LGBTI and/or gender nonconforming inmates/detainees is strictly prohibited unless required by consent decree, court order or other comparable legal authority.

Staff interviewed (intake staff and counselors) who complete these screenings all indicated that once an offender has a score, they will determine housing and programming accordingly.

The potential victims are potential perpetrators at this facility are housed on separate dorms/pods and tracked before placement. Each staff member interviewed was aware of this process and demonstrated it to the auditor. The program areas and nature of the facility allows for always viewing and interaction with staff and the population, but staff are aware of these individuals at all times.

The facility began using the PREA Housing and Programs Review Form, for all transgender and intersex inmates, every six months. Copies of this for all five recent inmates who were completed were provided to the auditor to review. In addition, the facility stated that there was currently five transgender inmates at the facility; the auditor interviewed two of these individuals, who were randomly selected from this list. This individuals recalled being called out and have this form discussed. It includes information on the inmates perception of their safety, security, medical and mental health concerns, and PREA Risk Assessments. This is reviewed by and signed by the Security Director, Classification Supervisors, Facility Commander, Programs Director, Mental Health Staff and Medical Staff. In addition, with these packets are memos for applicable unit staff explaining shower accommodations made for transgender inmates who wish to shower separately.

For each of the transgender inmates present at the facility, the facility provided memos whereas the PCM sent a memo to the need to know unit staff that the inmate can shower privately during county after it clears or at night, after all other inmates have locked down. This memo is directed to stay in the control room. In addition, all screenings for each of these individuals was provided to the auditor and demonstrated that the facility did screen each twice per year for 2021 and 2022.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist  
Policy 14-02 Sexual Abuse Prevention and Response  
14-02 B Sexual Abuse Screening Tool

	<p>Transgender Inmate input on Housing Sample</p>
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	<p>Shower Memo</p>
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<b>115.43</b>	<b>Protective Custody</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>(a) Policy 14-02 Sexual Abuse Prevention and Response states that inmates/ detainees at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate/detainee in involuntary segregated housing for less than twenty-four (24) hours while completing the assessment.</p> <p>(b) Policy 14-02 Sexual Abuse Prevention and Response states that inmate/detainees placed in segregated housing for this purpose shall have access to programs, privileges, education, or work opportunities to the extent possible. If access to programs, privileges, education, or work opportunities is restricted, the facility shall document the following: the opportunities that have been limited, the duration of the limitation and the reasons for such limitations.</p> <p>(c) Policy 14-02 Sexual Abuse Prevention and Response states that segregated housing shall be used only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of thirty (30) days.</p> <p>(d) Policy 14-02 Sexual Abuse Prevention and Response states that if involuntary segregated housing is warranted as outlined above, documentation of such action shall clearly specify: the basis for the facilities concern for the inmate/detainees safety and the reason why no alternative means of separation can be arranged.</p> <p>(e) Policy 14-02 Sexual Abuse Prevention and Response states that every thirty (30) days, a review of each inmate/detainees status will be conducted to determine whether there is a continuing need for separation from the general population.</p> <p>The facility has advised the auditor that they have not had any inmates placed in voluntary segregated housing for high risk of sexual victimization within the last twelve (12) months. Interviews, both formal and informal, with unit staff, security staff and segregation staff corroborated this. In addition, the auditor asked the Chief for segregation review logs and reviewed 'the reason for placement' sections of this document. No inmates in segregation were seen as being held in their for victimization risk.</p> <p>Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:</p> <p>PREA Standards Compliance Checklist</p>

	Policy 14-02 Sexual Abuse Prevention and Response
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	Confinement Record Sample
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<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>(a) (b) Policy 14-02 Sexual Abuse Prevention and Response states that inmate/ inmates shall be encouraged to immediately report pressure, threats, or instances of sexual abuse or sexual harassment, as well as possible retaliation by other inmates/ inmates or employees for reporting sexual abuse or sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Inmate/ inmates who are victims of sexual abuse have the option to report and incident to a designated employee other than an immediate point-of-contact line officer by using any of the following methods:</p> <ol style="list-style-type: none"> <li>1. Calling the facility’s twenty-four (24) hour toll-free notification telephone number;</li> <li>2. Verbally telling any employee, including the Chaplain;</li> <li>3. Calling the facility 24-hour toll free notification number;</li> <li>4. Submitting a request to meet with medical or mental health staff and/or reporting to medical staff during sick call;</li> <li>5. Forwarding a letter, sealed and marked ‘confidential’, to the Warden/facility administrator or any other employee;</li> <li>6. Calling or writing someone outside with facility who can notify facility staff; contacting the facility PREA compliance manager; and</li> <li>7. Electronically reporting allegation of sexual abuse and sexual harassment to the PREA mailbox listed in CORES system (where available).</li> </ol> <p>All reports of sexual abuse/harassment will be taken seriously and will be investigated. You will not be subject to retaliation, reprisal, harassment, or disciplinary action for truthfully reporting abuse or signs of abuse observed. Filing a false PREA claim will result in disciplinary action and/or prosecution.</p> <p><b>Reporting Allegations of Sexual Abuse/Sexual Harassment</b>  Anyone can report an allegation or suspected incident of sexual abuse or sexual harassment; including inmates, staff, or third parties. This can include allegations that may have occurred at another correctional facility. At a CoreCivic facility, there are multiple options to file a report; including, but not limited to:  Send a letter to the warden of the facility at the address provided on our facility locator.  Inmates may notify any staff member either verbally or in writing or they may call the PREA hotline numbers posted at their facilities.  Staff may report allegations via their chain of command or anonymously through the employee hotline numbers provided.  Staff and third parties may contact the CoreCivic's Ethics and Compliance Hotline: 1-800-461-9330 or e-mail <a href="http://www.corecivic.com/ethicsline">www.corecivic.com/ethicsline</a>  It is not required that any personal information be provided. However, the more information that can be provided regarding dates, times, locations, witnesses, and as</p>

much detail about the alleged incident as is known serves to assist staff and law enforcement in their efforts to successfully conduct the investigations. The auditor also filed a test report through the EthicsPoint System online at [https://secure.ethicspoint.com/domain/en/report\\_company.asp?clientid=45517&locationid=28782851&override=yes&agreement=no&companyname=CoreCivic](https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=45517&locationid=28782851&override=yes&agreement=no&companyname=CoreCivic).

Within fifteen minutes of being filed online, the Director of Ethics and compliance wrote an email response while forwarding it to the facility and stated that this would be the process. The agency PREA Coordinator/Director was included on thread. Warden and PCM immediately replied with receipt and stated that they would forward to be investigated.

Policy also states that inmates/detainees detained solely for civil immigration purposes shall be provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security.

(c) Policy 14-02 Sexual Abuse Prevention and Response states that inmate/inmates shall be encouraged to immediately report pressure, threats, or instances of sexual abuse or sexual harassment, as well as possible retaliation by other inmates/inmates or employees for reporting sexual abuse or sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Inmate/inmates who are victims of sexual abuse have the option to report and incident to a designated employee other than an immediate point-of-contact line officer by using any of the following methods (above).

Policy also states that employees must take all allegations of sexual abuse and harassment seriously, including verbal, anonymous, and third-party reports, and treat them as if the allegation is credible. Staff shall promptly document any verbal reports. All reports of sexual abuse and sexual harassment will be reported to the PREA Compliance Manager/Investigator. Employees having contact with the alleged victim should behave in a manner that is sensitive, supportive and non-judgmental.

(d) Policy 14-02 Sexual Abuse Prevention and Response states that employees may privately report sexual abuse and sexual harassment of inmates/inmates by forwarding a letter, sealed, and marked 'confidential, to the facility Administrator/Director.

The CoreCivic public website states:

Anyone can report an allegation or suspected incident of sexual abuse or sexual harassment; including inmates, staff, or third parties. This can include allegations that may have occurred at another correctional facility. At a CoreCivic facility, there are multiple options to file a report; including but not limited to:

- Contact the National Sexual Abuse Hotline at 1-800-656-4673

- Send a letter to the warden of the facility at the address provided on our facility profiles
- Inmates may notify any staff member either verbally or in writing or they may call the PREA hotline numbers posted at their facilities.
- Staff may report allegations via their chain of command or anonymously through the employee hotline numbers provided.
- Staff and third parties may contact the CoreCivic's Ethics and Compliance Hotline: 1-866-757-4448 or e-mail <http://www.corecivic.ethicspoint.com/>

If an inmate includes a PREA complaint in a grievance, the grievance coordinator or staff processing grievances would take it out of the time frame for grievance responses and place it immediately into the PREA response process. It would be turned over to the Investigator and a 5-1 Incident report would be completed. Technically an inmate could still submit a formal grievance on an allegation of sexual abuse or sexual harassment if he or she wished but the response would be expedited so as to ensure his/her safety. An interview was held with the grievance coordinator who described this process.

During the facility walkthrough, the auditor notices inmate grievance forms and inmate request forms available in the day rooms and education area demonstrating that they are readily available. In addition, locked mailboxes are in each unit hallway for inmates to privately place inside. After discussion with numerous specialized staff, it was stated that only unit managers and higher could access certain boxes, only medical can access the medical mailboxes, only the grievance officer can open the grievance mailbox and mailroom staff open the mailbox.

During the tour, the auditor had an inmate in the female pod log into a tablet. From there, with the inmates assistance, the auditor sent a test PREA related complaint. Within 7 minutes, the facility investigator entered the pod, showed me the email and forwarded to me to document receipt and the process.

During the tour, the facility information for inmates to show their access to PREA related processes and policies. Next to the phones used by inmates there was education information. While all information for reporting was present, the auditor suggested that the facility make more clear, the difference between reporting and advocacy information so inmates were clear in each number and its purpose. The facility, while the auditor was still onsite, immediately correct and replaced these throughout the facility.

Mailroom staff was interviewed and described the processes for legal mail, regular mail, facility mail and mail that may be sent to third party reporting mechanisms as it related to PREA. These methods were in compliance with the standard. Should inmates need additional forms or writing utensils, officers and unit staff have these items and will provide to inmates.

Posters were seen in all housing areas and in common areas throughout the facility, these posters were large, colorful and could be seen by inmates at a good eye level. In addition, inmates have

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-02 Sexual Abuse Prevention and Response

CoreCivic Website

CoreCivic Code of Ethics

Participant (Inmate) Handbook

First Responder card/staff reminders

Sexual Assault Awareness and Prevention pamphlet (English and Spanish)

PREA poster

Inmate Interviews (Random and Specialized)

Staff Interviews (Random and Specialized)

<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>(a)(b)(c)(d)(e)(f)(g) Policy 14-02 Sexual Abuse Prevention and Response states that unless otherwise mandated by contract, alleged incidents will not be processed through the facilities inmate/inmate grievance process. Should a report be submitted and received as an inmate/inmate grievance, whether inadvertently or due to contracting agency requirements, it will be immediately be referred to the facility Investigator or Administrative Duty Officer.</p> <p>The auditor interviewed the facility grievance officer in relation to this standard, while onsite. The grievance officer provided the auditor the grievance log, upon request, for September through November, 2022. The grievance officer stated that she checks the grievance mailboxes daily when she is onsite and she is the only one who has key. She stated that if a grievance that mentions sexual abuse or sexual harassment would be treated as an emergency grievance and immediately forwarded to the facility investigator and PCM for investigation. She would still log and ensure it was answered but it would not be subject to timelines or grievance procedures and would investigated through that process. She also provided a sample grievance where this occurred. In addition, she provided a sample Incident statement whereas while checking her grievance mailbox, she found a grievance with a PREA allegation. She immediately filed Incident Statement, and forward to the Warden and Shift Supervisor.</p> <p>The auditor tested the third party reporting mechanism through the online Ethics reporting system. The auditor immediately received a response and the facility was copied and they described the process if this occurred. Ethics line reporting posters were posted in visiting areas and in the four lobby for staff and third parties to obtain the information.</p> <p>Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:</p> <p>PREA Standards Compliance Checklist  Policy 14-02 Sexual Abuse Prevention and Response  Inmate Handbook  Grievance Log  Inmate confidential Mailboxes</p>

**115.53**

**Inmate access to outside confidential support services**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

(a) Policy 14-02 Sexual Abuse Prevention and Response states that inmates/inmates shall be provided access to outside victim advocates for emotional support services related to sexual abuse by giving inmates/inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, state or national victim advocacy or rape crisis organizations. Such information shall be included in the facilities inmate handbook. The facility shall enable reasonable communication between inmate/inmates and these organizations and agencies, in as confidential a manner as possible.

(b) Policy 14-02 Sexual Abuse Prevention and Response states that inmates/inmates shall be informed, prior to giving them access, of the extent to which such communications shall be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.

(c) Policy 14-02 Sexual Abuse Prevention and Response states that CoreCivic shall maintain or attempt to enter Memorandums of Understanding (MOU) or other agreements with community services providers that are able to provide inmates/inmates with confidential emotional support services related to sexual abuse. All MOUs must be reviewed and approved by the CoreCivic FSC Legal department prior to signature. The facility and FSC legal shall maintain copies of MOUs. The facility shall maintain documentation showing attempted to enter into such agreements.

The MOU was reviewed between CoreCivic and the Rape Crisis Center. This includes the provisions of this standard. An email was sent by the auditor to the Rape Crisis Center and a telephone call help with the. The Rape Crisis Center stated that due to changes in staff, they have been unable to make contact with facility. Information was exchanged and introductions with the new management team made.

While onsite, the posters and memos hanging in the units included conflicting information for reporting incidents and calling for advocacy between the various customer and corporate reporting mechanisms. As corrective action, the Warden and PCM shall clarify the difference between reporting and advocacy and reeducate all staff, via email and inmates by pulling all education information from the units, correcting and re-hanging with the correct information.

Also, while in a unit, the auditor called the phone number to Rape Crisis from an inmate phone. An advocate answered and was extremely nice, informational and stated what the process would be should they receive a call. She indicated that her supervisor would make visits, if needed, but she never has. They will speak and advocate for survivors of incidents whether or not they occurred in a correctional setting.

During the tour, the facility information for inmates to show their access to PREA related processes and policies. Next to the phones used by inmates there was education information. While all information for reporting was present, the auditor suggested that the facility make more clear, the difference between reporting and advocacy information so inmates were clear in each number and its purpose. The facility, while the auditor was still onsite, immediately correct and replaced these throughout the facility.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist  
Policy 14-02 Sexual Abuse Prevention and Response  
MOU with Rape Crisis Center and CoreCivic

PREA posters

Inmate Handbook

Flyers

Phamplet

**115.54 Third-party reporting**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

a) Policy 14-02 Sexual Abuse Prevention and Response states that CoreCivic employees, contractors, volunteers and interested third parties may report allegations of sexual abuse and sexual harassment (including anonymous reports) to the CoreCivic 24 hours Ethics line at 1-866-757-4448 or through [www.CoreCovic.ethicspoint.com](http://www.CoreCovic.ethicspoint.com).

The CoreCivic public website states:

Anyone can report an allegation or suspected incident of sexual abuse or sexual harassment; including inmates, staff, or third parties. This can include allegations that may have occurred at another correctional facility. At a CoreCivic facility, there are multiple options to file a report; including, but not limited to:

Send a letter to the warden of the facility at the address provided on our facility locator.

Inmates may notify any staff member either verbally or in writing or they may call the PREA hotline numbers posted at their facilities.

Staff may report allegations via their chain of command or anonymously through the employee hotline numbers provided.

Staff and third parties may contact the CoreCivic's Ethics and Compliance Hotline: 1-800-461-9330 or e-mail [www.corecivic.com/ethicsline](http://www.corecivic.com/ethicsline)

It is not required that any personal information be provided. However, the more information that can be provided regarding dates, times, locations, witnesses, and as much detail about the alleged incident as is known serves to assist staff and law enforcement in their efforts to successfully conduct the investigations.

The auditor also filed a test report through the EthicsPoint System online at [https://secure.ethicspoint.com/domain/en/report\\_company.asp?clientid=45517&locationid=28782851&override=yes&agreement=no&c](https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=45517&locationid=28782851&override=yes&agreement=no&c)

ompanyname=CoreCivic. The email was answered within fifteen minutes by Ethics staff and sent to the auditor and facility detailing the process.

Interviews with random and specialized staff and inmates both indicated that they were aware that reports from third parties would be accepted and investigated.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-02, Sexual Abuse Prevention and Response

CoreCivic website



14-2AA

Inmate handbook

Posters and Information throughout Facility

<b>115.61</b>	<b>Staff and agency reporting duties</b>
	<p data-bbox="256 188 983 221"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 557 297"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1474 499">(a) Policy 14-02 Sexual Abuse Prevention and Response states that accordance with this policy, employees/contractors are required to report immediately any knowledge, suspicion, or information regarding an incident of sexual abuse of sexual harassment [sic] that has occurred in any facility (including a facility that is not part of CoreCivic).</p> <p data-bbox="256 591 617 624">Policy further states that:</p> <ul data-bbox="256 674 1474 958" style="list-style-type: none"> <li>· Employees/contractors must take all allegations of sexual abuse seriously, including verbal, anonymous, and third-party reports, and treat them as if the allegation is credible. Staff shall promptly document any verbal reports.</li> <li>· When it is learned that an inmate is subject to substantial risk of imminent sexual abuse, immediate action shall be taken to protect the inmate.</li> <li>· Employees/contractors who fail to report allegations may be subject to disciplinary action.</li> </ul> <p data-bbox="256 1010 1358 1084">All staff have signed an acknowledgment of this provision, on the 14-2A form, CoreCivic PREA Policy Acknowledgment and/or Training Acknowledgement.</p> <p data-bbox="256 1135 1474 1254">A memo from the facility stated that the facility has had no reports of retaliation against staff or inmate who have reported incidents of alleged sexual abuse or sexual harassment since the previous audit.</p> <p data-bbox="256 1292 1474 1576">(b) Policy 14-02 Sexual Abuse Prevention and Response states that apart from reporting to designated supervisors or officials, employees shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, and as specified in this policy, to make treatment, investigation, and other security and management decisions. When it is learned that an inmate is subject to a substantial risk of imminent sexual abuse, immediate action shall be taken to protect the inmate.</p> <p data-bbox="256 1628 1474 1827">(c) Policy 14-02 Sexual Abuse Prevention and Response states that unless otherwise precluded by federal, state or local law, medical and mental health professionals shall be required to follow reporting procedures as outlined in policy. At the initiation of providing medical care, both medical and mental health professionals will inform inmate of their professional duty to report and the limitations of confidentiality.</p> <p data-bbox="256 1879 1474 2036">(d) Policy 14-02 Sexual Abuse Prevention and Response states that employees may privately report sexual abuse and sexual harassment of inmates by forwarding a letter, sealed and marked 'confidential' to the facility Administrator/Director or contact the CoreCivic ethics and compliance hotline.</p>

Further, policy states that if the alleged victim is under the age of eighteen (18) or considered a vulnerable adult under a state or local vulnerable person's statute, the allegation shall be reported to the designated state or local services agency under applicable mandatory reporting laws.

This facility indicated that they have not had any incidents of alleged sexual abuse and/or sexual harassment in which the alleged victim is under the age of 18 or considered a vulnerable adult within the last twelve (12) months.

(b) Policy 14-02 Sexual Abuse Prevention and Response states that all reports of sexual abuse and sexual harassment will be reported to the PREA Compliance Manager/Investigator. Employees having contact with the alleged victim should behave in a manner that is sensitive, supportive and non-judgmental.

The auditor reviewed multiple reports and was able to see the process involving the provisions of this standard. Every staff interviewed was able to describe their role as a first responder. Staff all had on their ID's a checklist of first responder duties.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist  
Policy 14-02 Sexual Abuse Prevention and Response  
Staff Rosters  
5-1C Incident report  
Incident Log  
Employee Training  
Inmate Notification Poster  
Staff Acknowledgement Sheets  
Notes/Memos  
Investigative Report with detailed first responder duties  
Interviews with Random Staff  
Interviews with Specialized Staff

<b>115.62</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>(a) Policy 14-02 Sexual Abuse Prevention and Response states that when it is learned that an inmate is subject to a substantial risk of imminent sexual abuse, immediate action shall be taken to protect the inmate. It is CoreCivic’s policy to aggressively investigate all allegation, regardless of the source, and prosecute those who are involved in incidents of sexual abuse. Alleged victims of sexual abuse or harassment will be provided a supportive and protective environment.</p> <p>In the past twelve (12) months, there were no instances in which the agency or facility determined that an inmate was subject to a substantial risk of imminent sexual abuse.</p> <p>During an interview with CoreCivic Vice President, Operations Administration, he stated that staff take immediate action to protect the inmate by removing the inmate from the area and/or individuals where risks may be stemming from, and an investigation is immediately initiated.</p> <p>Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:</p> <p>PREA Standards Compliance Checklist  Policy 14-02 Sexual Abuse Prevention and Response  Interview with CoreCivic Vice President, Operations Administration  Sample Report  Interview with PC  Interviews with Random Staff</p>

**115.63 Reporting to other confinement facilities**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

(a) Policy 14-02 Sexual Abuse Prevention and Response states that if the allegation involves events that took place while the alleged victim was not in CoreCivic custody (e.g. while housed at another provider’s facility), the following actions shall be taken:

1. The Administrator/Director that received the allegation shall contact the facility head or appropriate office of the facility where the alleged abuse took place as soon as possible, but no later than seventy-two (72) hours after receiving the allegation.
2. A copy of the statement of the inmate shall be forwarded to the appropriate official at the location where the incident was reported to have occurred.

The facility stated that there have been two allegations received that an inmate was sexually abused while confined at another facility.

(b) Policy 14-02 Sexual Abuse Prevention and Response states that if the allegation involves events that took place while the alleged victim was not in CoreCivic custody (e.g. while housed at another provider’s facility), the following actions shall be taken:

3. The Administrator/Director that received the allegation shall contact the facility head or appropriate office of the facility where the alleged abuse took place as soon as possible, but no later than seventy-two (72) hours after receiving the allegation.
4. A copy of the statement of the inmate shall be forwarded to the appropriate official at the location where the incident was reported to have occurred.

(c) Policy 14-02 Sexual Abuse Prevention and Response states that all such contacts and notification shall be documented on the 5-1B Notice to Administration; including any details learned from contact with the site where the alleged abuse took place, and the facilities response to the allegation.

(d) Policy 14-02 Sexual Abuse Prevention and Response states that upon receiving notification from another facility that an incident/allegation of sexual [sic] had occurred while the inmate was previously confined at the facility the facility will record the name of the agency making the notification, any information obtained, and shall request an inmate statement.

The facility warden and PAQ stated that there were two allegations have been received from other facilities in the past twelve (12) months.

During an interview with the CoreCivic Vice President, Operations Administration, he stated referrals to and from other facilities occurs most often at the facility level rather than at the corporate office level. The information is received by the Warden at the facility. However, any staff who received the information know to report it to the Warden, for appropriate action. It then gets added into our incident system and the

PREA protocols are initiated. If the allegation was alleged to have occurred at another facility, the facility Warden receiving the information would notify the Warden at the other facility within 72 hours. If the allegation received was that an incident of sexual abuse allegedly occurred within the CoreCivic facility both the partner agency and the investigative entity responsible for criminal investigations would be notified. He also stated that the most common examples are allegations inmates make during their intake process. The CoreCivic staff obtain as much information as possible from the inmate and provide this to Warden at the other facility as part of the notification.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

Corrections PREA Standards Compliance Checklist  
Policy 14-02 Sexual Abuse Prevention and Response

**115.64 Staff first responder duties**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

(a) Policy 14-02 Sexual Abuse Prevention and Response states in the Response Procedures Sections that any employee who discovers or learns of sexual abuse, or an allegation of sexual abuse, shall ensure that the following actions are accomplished:

a. The alleged victim is kept safe, has no contact with the alleged perpetrator and is immediately escorted to the Health Services Department.

b. While in the private area, employees shall, to the best of their ability, ensure that that the victim does not wash, shower, remove clothing use the restroom facilities, eat drink, smoke or brush his/her teeth. The highest-ranking authority on-site is immediately notified and will further ensure to protect the safety of the victim and the integrity of the crime scene and any investigation.

All staff have signed an acknowledgment of this provision, on the 14-2A form, CoreCivic PREA Policy Acknowledgment and/or Training Acknowledgement. The acknowledgment for all staff were reviewed by the auditor and in compliance.

A sample report was reviewed by the auditor for an incident of alleged sexual abuse. In the report, staff documented their efforts to maintain the preservation of evidence as noted in the provisions of this standard and in policy.

(b) Policy 14-02 Sexual Abuse Prevention and Response states that if the first staff responder is not a security staff member, the responder shall be required to request that they alleged victim not take any actions that could destroy physical evidence and notify security staff.

Staff are all provided, and the auditor saw while on-site, a First Responder Duty card to add to their ID. It states:

- A has a zero tolerance for all forms of sexual abuse and sexual harassment.

**FIRST RESPONDER DUTIES:**

- Separate the alleged victim and abuser (ordinarily the victim should not be placed in segregation/restrictive housing).
- Preserve and protect the crime scene until steps can be taken to collect evidence. · If the abuse occurred within a time period that still allows for the collection of physical evidence, request the alleged victim not take any actions that could destroy physical evidence (such as washing, brushing teeth, changing clothes, urinating, defecating, drinking or eating).
- ensure the alleged abuser does not take any of the above actions that can

destroy physical evidence.

- Immediately notify your supervisor and medical and mental health practitioners.

Confidentiality must be maintained, apart from reporting to designated supervisors or officials.

Staff had first responder duties reminder cards on their ID lanyards. Those interviewed, formally and informally, were able to describe their first responder duties when provided with a scenario by the auditor.

Documents reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-2, Sexual Abuse Prevention and Response

First Responder Cards

PREA Training Acknowledgements

Interviews with Random Staff

Interview with PCM

Sample Report



<b>115.65</b>	<b>Coordinated response</b>
	<p data-bbox="256 188 983 221"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 557 297"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1442 416">(a) Policy 14-02 Sexual Abuse Prevention and Response states that each facility will establish a SART which includes but is not limited to the following positions:</p> <ul style="list-style-type: none"> <li data-bbox="256 465 703 499">o PREA Compliance Manager</li> <li data-bbox="256 506 671 539">· Security Representative</li> <li data-bbox="256 546 663 580">· Medical Representative</li> <li data-bbox="256 586 600 620">· MH Representative</li> <li data-bbox="256 627 724 660">· Victim Services Coordinator</li> </ul> <p data-bbox="256 716 1099 750">The SART responsibilities shall include the following in part:</p> <ul style="list-style-type: none"> <li data-bbox="256 790 1342 866">o Responding to reported incidents of sexual abuse; o Responding to victim assessment and support needs;</li> <li data-bbox="256 873 1394 907">o Ensuring policy and procedures are enforced to enhance inmate safety; and</li> <li data-bbox="256 947 1442 1023">o Participating in the development of practices and/or procedures that encourage prevention of sexual abuse and enhance compliance with PREA National Standards.</li> </ul> <p data-bbox="256 1064 1453 1173">Further, policy states that any employee who discovers or learns of sexual abuse, or an allegation of sexual abuse shall ensure that the following actions are accomplished:</p> <ul style="list-style-type: none"> <li data-bbox="256 1227 1481 1303">· The alleged victim is kept safe, has no contact with the alleged perpetrator, and is immediately escorted to the Health Services Department.</li> <li data-bbox="256 1310 1481 1509">· While in the Health Services, employees shall, to the best of their ability, ensure that that the victim does not wash, shower, remove clothing use the restroom facilities, eat drink, smoke or brush his/her teeth. The highest-ranking authority onsite is immediately notified and will further ensure to protect the safety of the victim and the integrity of the crime scene and any investigation.</li> <li data-bbox="256 1516 1481 1637">· The highest-ranking authority onsite is immediately notified and will further ensure to protect the safety of the victim and the integrity of the crime scene and any investigation.</li> <li data-bbox="256 1644 1469 1720">· When the alleged perpetrator is an inmate/detainee, he/she is secured in a single cell in the event evidence collection is required.</li> <li data-bbox="256 1727 1305 1760">· All acquired information concerning the allegation is kept confidential.</li> <li data-bbox="256 1767 1410 1800">· An incident statement is written in accordance with the CoreCivic Policy 5-1C.</li> </ul> <p data-bbox="256 1841 1458 2040">Policy then further goes on to describe, in detail, all processes that would follow, to include but not limited to: preserving evidence; notifications; scene preservations; notifications if this occurred at another location; steps in the event an employee was involved; review team; administrative and criminal investigations; roles with an investigating entity; and advocacy.</p>

In the response plan, the Sexual Abuse Incident Protocol, form 13-79A is included.

This is used at the invitation of any incident allegation that may occur and ensures that all steps in the plan are carried out in a timely manner.

All staff had a first responder card on their ID cards and those interviewed were able to detail the process of responding.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Checklist

Policy 14-02, Sexual Abuse Prevention and Response

Interview with CoreCivic Vice President, Random Staff, Specialized staff

<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>(a) Policy 14-02 Sexual Abuse Prevention and Response states that neither CoreCivic nor any other entity responsible for collective bargaining on CoreCivic’s behalf shall enter into or renew any collective bargaining agreement or other agreement that limits the company’s ability to remove alleged employee 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. Nothing in this requirement shall restrict entering into or renewal of agreements that govern:</p> <ul style="list-style-type: none"> <li>o The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions outlined above in Q.2.a-c. and a preponderance of the evidence in determining whether sexual abuse or sexual harassment are substantiated.</li> <li>o Whether a no-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the employees personnel file following a determination that the allegation of sexual abuse is not substantiated.</li> </ul> <p>During an interview with the CoreCivic Vice President, Operations Administration, he stated that CoreCivic as an agency has entered into and/or renewed collective bargaining agreements since August 20, 2012. The agreements permit CoreCivic to remove alleged staff sexual abusers from contact with an inmate pending an investigation of disciplinary action.</p> <p>Nevada Southern is not subject to any collective bargaining agreement.</p> <p>Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:</p> <p>PREA Standards Compliance Checklist  Policy 14-02 Sexual Abuse Prevention and Response  Interview with CoreCivic Vice President, Operations Administration</p>

**115.67 Agency protection against retaliation**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

(a) Policy 14-02 Sexual Abuse Prevention and Response states that inmate and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations shall be protected from retaliation by other inmates or staff.

(b) Policy also states that ADO staff, or the Warden will determine on a case by case basis whether or not placement of a staff member in a non-contact role with the victim and/or other inmates is warranted. This determination will take into account the gravity and credibility of the allegations.

(c) Policy 14-02 Sexual Abuse Prevention and Response states that to ensure that thirty/sixty/ninety (30/60/90) day monitoring is conducted by the designated staff, following a report of sexual abuse or sexual harassment, to protect against potential retaliation against inmates or employees. Policy further states that monitoring shall continue beyond ninety (90) days if the initial monitoring indicates a continuing need. The PCM shall ensure prompt action are taken to remedy any identified retaliation.

In the past twelve (12) months, there has been zero incidents of retaliation occurring at this facility, according to the PAQ.

(d) Policy 14-02 Sexual Abuse Prevention and Response states that this shall include periodic status checks of inmates/detainees and review of relevant documentation.

(e) Policy 14-02 Sexual Abuse Prevention and Response states the PCM will ensure any other individual who cooperate with an investigation and expresses fear of retaliation is protected from retaliation.

During an interview with the CoreCivic Vice President, Operations Administration, he stated that for both inmates and staff who have reported allegation of sexual abuse, we provide monitoring on a 30/60/90-day period, longer if needed, to ensure no retaliation has occurred. These reviews are documented on an attachment to our 14-2 policy. The review takes into consideration any actions which may be perceived as retaliatory whether it be housing and/or job assignments with inmates and shift changes, evaluations, etc. for staff. These reviews also prohibit retaliation for any reason, and we include this expectation in training with staff. Any violations are acted upon accordingly. For those who cooperate and express a fear of retaliation, our policies and practices prohibit retaliation for any reason and we include the expectation in training with staff. Any violations are acted upon accordingly.

Of the investigations selected and reviewed by the auditor, all included retaliation monitoring. In addition, while onsite and while interviewing the retaliation monitor, the auditor selected a new case and reviewed the monitoring form which was

completed. The monitor was able to detail the process and provided samples of what is considered when monitoring and speaking with the inmates.

Documents Reviewed, Interviews Conducted, and Observations that helped the auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-02, Sexual Abuse Prevention and Response

PREA Retaliation Monitoring Form

Incident Report

30/60/90 day samples

Interviews with CoreCivic Vice President, Random Staff, PCM, Retaliation Monitor

<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>(a) Policy 14-02 Sexual Abuse Prevention and Response states that inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been made that there is no available means of separation from likely abusers. If the facility cannot conduct such an assessment immediately, the facility may hold the inmate/detainee in involuntary segregated housing for less than twenty-four (24) hours while completing the assessment.</p> <p>Policy 14-02 Sexual Abuse Prevention and Response states that inmate/detainees placed in segregated housing for this purpose shall have access to programs, privileges, education, or work opportunities to the extent possible. If access to programs, privileges, education, or work opportunities is restricted, the facility shall document the following: the opportunities that have been limited, the duration of the limitation and the reasons for such limitations.</p> <p>In addition, Policy 14-02 Sexual Abuse Prevention and Response states that segregated housing shall be used only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of thirty (30) days. If involuntary segregated housing is warranted as outlined above, documentation of such action shall clearly specify: the basis for the facilities concern for the inmate/detainees safety and the reason why no alternative means of separation can be arranged.</p> <p>Policy 14-02 Sexual Abuse Prevention and Response states that every thirty (30) days, a review of each inmate/detainees status will be conducted to determine whether there is a continuing need for separation from the general population.</p> <p>The facility advised the auditor that the facility has had no inmates placed in involuntary segregated housing for high risk of sexual victimization within the last twelve (12) months. Inmates involved in incidents were reviewed with to determine housing and those inmates were not placed in segregation.</p> <p>Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:</p> <p>PREA Standards Compliance Checklist Policy 14-02 Sexual Abuse Prevention and Response</p>

<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>(a) Policy 14-02 Sexual Abuse Prevention and Response states that facility administrative investigations into allegations of sexual abuse and sexual harassment shall be done promptly, thoroughly, and objectively for all allegations including thirdparty reports and anonymous reports.</p> <p>(b) Policy 14-02 Sexual Abuse Prevention and Response states the facility shall use investigators for administrative investigations who have received special training in sexual abuse investigations pursuant to Standards.</p> <p>The facility provided a Certificate of Completion for the one (1) assigned facility investigators (this investigator is no longer at the facility and the documents for another investigator, at a neighboring facility were also provided). The certificate is from a training entitled PREA: Investigating Sexual Abuse in a Confinement Setting which was delivered online through the National Institute of Corrections. In addition, CoreCivic held a webinar training entitle PREA Update, Investigation Standards and Required Specialty Training.</p> <p>(c) Policy 14-02 Sexual Abuse Prevention and Response states that specialized shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collections in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.</p> <p>Policy also states that documentation confirming that investigators have completed the required specialized training in conducting sexual abuse investigations shall be maintained in accordance with facility record retention policies.</p> <p>The curriculum for each of the two trainings was provided and reviewed by the auditor (through CoreCivic and the National Institute of Corrections) and each training included the requirements of the standard and Policy 14-02 : Techniques for interviewing sexual abuse victims, the proper use of Miranda and Garrity warnings, Sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.</p> <p>(d) Policy 14-02 Sexual Abuse Prevention and Response states that specialized training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collections in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.</p> <p>Policy also states that documentation confirming that investigators have</p>

completed the required specialized training in conducting sexual abuse investigations shall be maintained in accordance with facility record retention policies.

The curriculum for each of the two trainings was provided and reviewed by the auditor (through CoreCivic and the National Institute of Corrections) and each training included the requirements of the standard and Policy 14-02 : Techniques for interviewing sexual abuse victims, the proper use of Miranda and Garrity warnings, Sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

(f) Policy 14-02 Sexual Abuse Prevention and Response states that administrative investigations shall include an effort to determine whether staff actions or failures to act contributed to the abuse.

(g) NSDC staff does not conduct criminal investigations, allegations that could be criminal are forward to the Nye Sheriff's Office. These notifications are noted in the 5-1 packets as notification but no other information, documentation, follow-up or conclusions have been produced by the facility.

Policy 14-02 states that criminal investigations shall be documented in a written report that contains a thorough description of physical , testimonial, and documentary evidence and attaches copies of documentary evidence where feasible.

(h) NSDC staff does not conduct criminal investigations, allegations that could be criminal are forward to the Nye Sheriff's Department. These notifications are noted in the 5-1 packets as notification but no other information, documentation, follow-up or conclusions have been produced by the facility.

(i) Policy 14-02 Sexual Abuse Prevention and Response states that the agency shall retain all investigative reports into allegations of sexual abuse for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

CoreCivic Policy 1-15 Retention of Records stats that 115 B Records Retention Schedule will be utilized to determine the retention period of company records.

Records stored electronic are subject to the same retention period and procedures as documents store in non-electronic forms. On the Schedule it stated that 5-1 Incident Packets and Aggregated PREA Sexual Abuse data shall be retained for ten (10) years.

In addition, PREA investigative files and written reports to be retained if the alleged abuser is incarcerated or employed plus five (5) years.

(k) Policy 14-02 Sexual Abuse Prevention and Response states that investigations conducted by a facility employee for allegations of sexual abuse will be handled in accordance with the Code of Federal Regulation, title 28, part 115.21, Evidence Protocol and Forensic Medical Examinations, as outlined below. If the facility is not responsible for investigating such allegations, the facility shall request that the



responsible outside agency or entity comply with these requirements:

- The investigating entity shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.

(I) Policy 14-02 Sexual Abuse Prevention and Response states that the facility shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.

After leaving the facility, the Director of PREA, Investigations for CoreCivic sent the auditor a new training, slides and sign in sheet, showing that the facility investigator took this training. In this training, and among other topics, they covered the preponderance of evidence standard, proof thresholds for criminal versus administrative investigations, and other related topics.

The facility provided the auditor a list with 23 cases of which the auditor selected 11 to review for the elements of this and other standards and provisions. Of those reviewed, all contained the required documentation, utilized the necessary burden of proof, and contained reports which included the necessary elements. On the record log of incidents, some were listed as 'voided'. The auditor inquired and met with the PC, investigator, PCM and other involved parties. These matters included things were allegations of PREA incidents and were later determined not to be. The auditor, after discussions and evaluating the cases asked the facility to complete the investigations packets and provide an outcome of unsubstantiated, substantiated or unfounded for each. In addition, the auditor stated that if it was determined to be unfound but had other policy violations, it should be labeled as such. The facility and PC agreed, educated those involved and immediately corrected this process.

The records room was viewed and records staff is always present. Only authorized staff can view private information in the computer and in the file room. A memo is posted of which staff have access to inmate files. All screening information in computerized and only need to know staff have access to the responses to the computer questions. Additional staff, who may be required to move inmates housing or assign inmates to programs can see if any inmate is scored as a victim, potential victim, perpetrator, or potential perpetrator to use that information to determine housing.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-2, Sexual Abuse Prevention and Response

Investigations Training

Investigations Records

Policy 1-15 Retention of Records

<b>115.72</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 264 560 297"><b>Auditor Discussion</b></p> <p data-bbox="256 342 1469 499">(a) Policy 14-02 Sexual Abuse Prevention and Response states in any sexual abuse or sexual harassment investigation in which the facility is the primary investigating entity, the facility shall utilize the preponderance of the evidence standard for determining whether sexual abuse or sexual harassment has taken place.</p> <p data-bbox="256 544 1481 779">A PowerPoint Training excerpt was shown to the auditor from the PREA Resource Center which stated “the criteria for administrative action are determined by individual agencies. However, the Standards required that agencies set the bar no higher than requiring the preponderance of the evidence to substantiate an allegation for administrative action, which would mean that more than 50% of the evidence supports the allegation.</p> <p data-bbox="256 790 1445 902">Incident synopses were proved and reviewed which demonstrated that a preponderance of the evidence standard was applied and noted in the investigation conclusion.</p> <p data-bbox="256 947 1414 1014">An interview with the facility investigator demonstrated that he was aware of this burden and he was able to describe it.</p> <p data-bbox="256 1059 1437 1126">Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:</p> <p data-bbox="256 1182 1414 1384"> PREA Standards Compliance Checklist  Policy 14-02 Sexual Abuse Prevention and Response  5-1A Incident Report with 5-1G Investigative Report  Investigations Training curriculum from NCICS  National PREA Resource Center Notification of Curriculum Utilization Investigation </p>

**115.73 Reporting to inmates**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

(a) (b) Policy 14-02 Sexual Abuse Prevention and Response states that following an investigation into an inmate’s allegation that he/she suffered sexual abuse at the facility, the inmate shall be informed as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. If the facility did not conduct the investigation, the relevant information shall be requested from the outside investigating agency or entity in order to inform the inmate.

In the past twelve (12) months, there were twenty-eight (28) investigations of alleged inmate sexual abuse completed.

(c) Policy 14-02 Sexual Abuse Prevention and Response states that following an inmate’s allegation that an employee has committed sexual abuse against the inmate the facility shall subsequently inform the inmate (unless the facility has determined that hey allegation in unfounded) whenever:

- (1) The employees no longer posted within the inmate’s unit as a result of the finding of the investigation;
- (2) The employee is no longer employed at the facility;
- (3) The facility learns that the employee has been indicted on a charge related to sexual abuse within the facility; or
- (4) The facility learns that the employee has been convicted on a charge related to sexual abuse within the facility.

(d) Policy 14-02 Sexual Abuse Prevention and Response states that following an inmate’s allegation that he/she has been sexually abused by another inmate, the facility shall subsequently inform the alleged victim whenever:

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

(e) Policy 14-02 Sexual Abuse Prevention and Response states all inmates/inmate notifications or attempted notifications shall be documented on the 14-2-E Inmate Allegation Status Notification. The inmate shall sign the 4-2 -E, verifying that such notification has been received. The signed 14-2-e shall be filed in the inmate’s institutional file.

(f) Policy 14-02 Sexual Abuse Prevention and Response states the facilities obligation to notify the inmate as outlined in the section shall terminate if the inmate is released from CoreCivic’s custody.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-02 Sexual Abuse Prevention and Response

Interview with PC

Interview with PCM

Interview with Director

Inmate PREA Allegation Status Notification, 14-2E- Substantiated

Inmate PREA Allegation Status Notification, 14-2E- Unsubstantiated

Inmate PREA Allegation Status Notification, 14-2E- Unfounded

115.76 Disciplinary sanctions for staff

<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>(a) Policy 14-02 Sexual Abuse Prevention and Response states that employees shall be subject to disciplinary sanctions up to and including termination for violating CoreCivic’s sexual abuse or sexual harassment policies. Termination shall be the presumptive disciplinary sanction for employees who have engaged in sexual abuse.</p> <p>NSDC has not had any staff disciplined for violating sexual abuse or sexual harassment policies within the past twelve (12) months.</p> <p>(b) Policy 14-02 Sexual Abuse Prevention and Response states that employees shall be subject to disciplinary sanctions up to and including termination for violating CoreCivic’s sexual abuse or sexual harassment policies. Termination shall be the presumptive disciplinary sanction for employees who have engaged in sexual abuse.</p> <p>In the past twelve (12) months, according to the PAQ, there have been zero staff members who have been terminated, disciplined or reported to law enforcement for violating agency sexual abuse or sexual harassment policies.</p> <p>(c) Policy 14-02 Sexual Abuse Prevention and Response states that disciplinary sanctions for violations of CoreCivic policies relating to sexual abuse or sexual harassment shall be commensurate with the nature and circumstances of the acts committed, the employee’s disciplinary history, and the sanctions imposed for comparable offenses by other employees with similar histories.</p> <p>(d) Policy 14-02 Sexual Abuse Prevention and Response states that all terminations for violations of CoreCivic sexual abuse or sexual harassment policies, or resignations by employees who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.</p> <p>In the past twelve (12) months, according to the PAQ, there have been zero staff members who have been terminated, disciplined or reported to law enforcement for violating agency sexual abuse or sexual harassment policies. HR staff confirmed this during interviews.</p> <p>Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:</p> <p>PREA Standards Compliance Checklist</p> <p>Policy 14-02, Sexual Abuse Present and Response</p> <p>Code of Ethics</p> <p>Investigation Samples</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>(a) Policy 14-02 Sexual Abuse Prevention and Response states that any civilian, volunteer or contractor who engages in sexual abuse shall be prohibited from contact with inmates and shall be reported to law enforcement agencies and to any relevant licensing body.</p> <p>In the past twelve (12) months, according to the PAQ, there have been zero contracted staff members who have been terminated or reported to law enforcement for violating agency sexual abuse or sexual harassment policies.</p> <p>In addition, policy 22-1, Volunteers Services and Management states that volunteers, regardless of level, are expected to abide by CoreCivic and applicable contracting government agency policy, procedures, regulations, and prevailing law. Failure to do so may result in immediate termination or removal from the Volunteer Roster. Relationships that are beyond or outside the scope of the approved volunteer service being provided by the volunteer constitute grounds for immediate termination or removal from the Volunteer Roster. Termination and/or removal from volunteer services and the Volunteer Services roster may result from any violation of the volunteer code of ethics or volunteer dress code and the facility's published dress codes, and conduct restrictions at the discretion of the Warden.</p> <p>(b) Policy 14-02 Sexual Abuse Prevention and Response states that any other violation of CoreCivic sexual abuse or sexual harassment policies by a civilian or contractor will result in appropriate corrective action up to and including restricting contact with inmates and removal from the facility.</p> <p>Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:</p> <p>PREA Standards Compliance Checklist  Policy 14-02 Sexual Abuse Prevention and Response  Policy 22-1, Volunteers Services and Management  Note from facility: there have been no substantiated allegations of contractor or volunteer sexual abuse/harassment.</p>

**115.78 Disciplinary sanctions for inmates**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

(a) Policy 14-02 Sexual Abuse Prevention and Response states in the Disciplinary Procedures, substantiated incidents sections that inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engages in inmate-on-inmate abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.

Policy also states that because the burden of proof is substantially easier to prove in an inmates/detainees disciplinary case than in a criminal prosecution, an inmate/ detainee may be institutionally disciplined even through law enforcement officials decline to prosecute.

In the past twelve (12) months, there have been no administrative findings or criminal findings of guilt on inmate-on-inmate abuse that have occurred at this facility, according to the PAQ.

(b) Policy 14-02 Sexual Abuse Prevention and Response states in the Disciplinary Procedures, substantiated incidents sections that 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.

(c) Policy 14-02 Sexual Abuse Prevention and Response states in the Disciplinary Procedures, substantiated incidents sections that the disciplinary process shall consider whether an inmates mental disabilities or mental illness contributed to his/ her behavior when determining what type of sanction, if any, should be imposed. In addition, Policy 15-2, Disciplinary Procedures states that if the inmate has been diagnosed as having a psychiatric illness, he Warden/Administrator and the responsible physician or their designee will be consulted prior to the disciplinary measures recommended by the Hearing Officer or Disciplinary Board being taken.

(d) Policy 14-02 Sexual Abuse Prevention and Response states in the Disciplinary Procedures that if the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the alleged perpetrator to participate in such interventions as a condition of access to programming or other benefits.

(d) Policy 14-02 Sexual Abuse Prevention and Response states in the Disciplinary Procedures, substantiated incidents sections that an inmate may be disciplined for sexual conduct with an employee only upon finding that the employee did not consent to such contact.

(e) Policy 14-02 Sexual Abuse Prevention and Response states in the

Disciplinary Procedures, substantiated incidents sections that inmates who deliberately allege false claims of sexual abuse can be disciplined. For the purposes of disciplinary action, a report of sexual abuse made in good faith based on a reasonable belief that the alleged contact occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

In the past twelve (12) months, there have been no inmates that received disciplinary action for falsified reports of sexual abuse.

(g) Policy also states that sexual activity between inmates is prohibited in all CoreCivic facilities, and inmates may be disciplined for such activity. Such activity shall not be deemed sexual abuse if it is determined that the activity is not coerced.

Disciplinary logs were reviewed to corroborate this.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist  
Policy 14-02 Sexual Abuse Prevention and Response  
Policy 15-1 Offense and Penalty Code  
Policy 15-2 Disciplinary Procedures  
Incident report  
Memo/Note  
Staff interviews



<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>(a) Policy 14-2 Sexual Abuse Prevention and Response states that inmates identified during the intake screening as at risk for sexual victimization with a history of prior sexual victimization whether it occurred in an institutional setting or the community shall be offered a follow-up meeting with a medical or mental health practitioner or other qualified professional within 14 days of the intake screening,</p> <p>Policy 13-61 Mental Health Services states that an initial mental health screening will be performed on all inmate patients during intake. To identify any obvious mental health needs.</p> <p>(b) Policy 14-2 Sexual Abuse Prevention and Response states that inmates, excluding jail inmates, identified during the intake screening as high risk with a history of sexually assaultive behavior, whether it occurred in an institutional setting or in the community, shall be offered a follow-up meeting with a mental health practitioner or other qualified professional within 14 days of the intake screening.</p> <p>Policy 13-61 Mental Health Services states that mental health appraisals will be conducted by a QMHP within fourteen (14) days of admission to the facility.</p> <p>(c) Policy 14-2 Sexual Abuse Prevention and Response states that inmates identified during the intake screening as at risk for sexual victimization with a history of prior sexual victimization whether it occurred.</p> <p>(d) Policy also states that patient inmate information, whether in the form of the documentary medical record, computerized data, or as information known to a member of the Health Services staff, is strictly confidential and may be disclosed only to those who are responsible for the patient inmate's care or who have a legitimate interest in the patient inmate's medical history.</p> <p>With the exception of QHCP, staff shall have access to patient inmate information on a need-to-know basis, and clinicians may abstract patient inmate information for consultants to whom they refer patient inmates.</p> <p>Policy 13-74, Privacy of Protected Health Information thoroughly outlines all staff who may have access to protected health information and the process of consent to release any information.</p> <p>(e) Policy 13-74, Privacy of Protected Health Information thoroughly outlines all staff who may have access to protected health information and the process of consent to release any information. Further it states that an authorization from the patient is required for use and disclosure of PHI for all individuals not outlined in the policy as having access.</p>

Policy 14-2 states that medical and mental health practitioners shall obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18.

CoreCivic policy 14-2 Sexual Abuse Prevention and Response states that treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

In addition, an intake packet from mental health was provided to the auditor which is used when an inmate prompts it by answers to certain questions on the PREA Screening, which included: Intake checklist, Comprehensive Clinical Record Review, Health Questionnaire, Sick Call Procedures, Problem Oriented Progress record, and Teaching Counseling Plan Document, among other medical related documents.

Of the files randomly selected by the auditor to review, 9 screenings required a MH follow-up be offered. Each of the nine were provided to and reviewed by auditor in compliance with the standard. Interviews with unit staff and MH staff detailed the process of how this occurs and the form used.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist  
Policy 14-02 Sexual Abuse Prevention and Response  
Policy 13-58 Medical Records  
Policy 13-61Mental Health Services  
Policy 1374 Privacy of Protected Health Information

14-2 Screening Tool  
13-50 A Initial Intake Screening  
13-61 A Comprehensive Mental Health Evaluation and Follow Up Investigation sample

<b>115.82</b>	<b>Access to emergency medical and mental health services</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>(a) Policy 14-2 Sexual Abuse Prevention and Response states that inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis interventions services, the nature and scope of which shall be determined by community medical and mental health practitioners according to their professional judgment.</p> <p>Policy 14-02 Sexual Abuse Prevention and Response states in the Response Procedures Sections that any employee who discovers or learns of sexual abuse, or an allegation of sexual abuse, shall ensure that the following actions are accomplished:</p> <p>a. The alleged victim is kept safe, has no contact with the alleged perpetrator and is immediately escorted to the Health Services Department.</p> <p>Policy 13-79 Sexual Assault Response states that upon receiving a notice of an alleged RAPE that occurred within the previous seventy-two (72) hours, QHCP will examine the patient inmate utilizing the protocol and will arrange for the patient inmate to be transported to the local, designated Emergency Room (ER) for examination, evidence collection, and prophylaxis treatment for sexually transmitted diseases.</p> <p>Beyond the seventy-two (72) hours, physical trauma is evident, the patient inmate will be transported to the local designated emergency room, in accordance with the procedures outlined above.</p> <p>Policy 13-79 Sexual Assault Response states that patient inmate victims of sexual abuse shall be offered testing for sexually transmitted infections and 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. Patient inmate victims of sexually abusive vaginal penetration will be offered pregnancy tests.</p> <p>NSDC has qualified medical staff on site twenty-four (24) hours per day.</p> <p>(b) Policy 14-2 Sexual Abuse Prevention and Response states if the facility does not have qualified medical or mental health practitioners on staff, security first responders shall take preliminary steps to protect the victim.</p> <p>Policy 13-79 Sexual Assault Response states that upon receiving a notice of an alleged rape that occurred within the previous seventy-two (72) hours, QHCP will examine the patient inmate utilizing the protocol and will arrange for the patient inmate to be transported to the local, designated Emergency Room (ER) for</p>

examination, evidence collection, and prophylaxis treatment for sexually transmitted diseases.

(c) Policy 13-79 Sexual Assault Response states that upon receiving a notice of an alleged rape that occurred within the previous seventy-two (72) hours, QHCP will examine the patient inmate utilizing the protocol and will arrange for the patient inmate to be transported to the local, designated Emergency Room (ER) for examination, evidence collection, and prophylaxis treatment for sexually transmitted diseases.

(b) Policy 14-2 Sexual Abuse Prevention and Response states that treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist  
Policy 14-02 Sexual Abuse Prevention and Response  
Policy 13-79 Sexual Assault Response  
Investigation sample

<b>115.83</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 311 560 344"><b>Auditor Discussion</b></p> <p data-bbox="256 389 1433 506">(a)(b) Policy 14-02 Sexual Abuse Prevention and Response states that the Health Services Department shall provide services in accordance with CoreCivic policy 13-79 Sexual Assault Responses, unless otherwise mandated by contract.</p> <p data-bbox="256 544 1485 869">Policy 13-79 Sexual Assault Response states that upon receiving notice of an alleged RAPE that occurred within the previous seventy-two hours, QHCP will examine the patient inmate utilizing the 13-79A Rape/Sexual Assault Protocol and will arrange for the patient inmate to be transported to the local designated Emergency Room (ER) for examination, evidence collection, and prophylaxis treatment for sexually transmitted disease. If physical trauma is evident for an incident beyond the seventy-two (72) hours, the patient inmate will be transported to the local designated emergency room, in accordance with the procedures outlined above.</p> <p data-bbox="256 920 1433 1077">Further, Policy 14-02 Sexual Abuse Prevention and Response states that all patient inmates who allege rape or sexual assault will be offered access to confidential support services as specified in CoreCivic Policy 14-2 Sexual Abuse Prevention and Response.</p> <p data-bbox="256 1122 1474 1402">(c) Policy 14-02 Sexual Abuse Prevention and Response states that the medical representative will in cases of sexual abuse, ensure that the facility’s medical staff respond appropriately in medically stabilizing an alleged victim before assessment by a community medical provider, if medically indicated; and address any ongoing medical care needs following the incident. In addition, the mental health representative will ensure mental health needs are addressed according to policy and local procedure.</p> <p data-bbox="256 1453 1469 1778">Policy 13-79 Sexual Assault Response states that upon receiving notice of an alleged RAPE that occurred within the previous seventy-two hours, QHCP will examine the patient inmate utilizing the 13-79A Rape/Sexual Assault Protocol and will arrange for the patient inmate to be transported to the local designated Emergency Room (ER) for examination, evidence collection, and prophylaxis treatment for sexually transmitted disease. If physical trauma is evident for an incident beyond the seventytwo (72) hours, the patient inmate will be transported to the local designated emergency room, in accordance with the procedures outlined above.</p> <p data-bbox="256 1816 1453 2063">(d) Policy 13-79 Sexual Assault Response states that patient inmate victims of sexual shall be offered testing for sexually transmitted infections and 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. Patient inmate victims of sexually abusive vaginal penetration will be offered pregnancy tests. In the event the inmate</p>

tests positive for pregnancy, the patient inmate will be provided information regarding lawful pregnancy-related services in a timely manner.

CoreCivic and Policy 14-2 Sexual Abuse Prevention and Response states that inmate victims of sexually abusive vaginal penetration while incarcerated shall be referred for pregnancy tests. If pregnancy results, victims shall receive timely and comprehensive information and access, to all lawful pregnancy-related medical services.

(e) Policy 14-2 Sexual Abuse Prevention and Response states that inmate victims of sexually abusive vaginal penetration while incarcerated shall be referred for pregnancy tests. If pregnancy results, victims shall receive timely and comprehensive information and access, to all lawful pregnancy-related medical services.

(f)(g)(h) Policy 14-02 Sexual Abuse Prevention and Response states that inmate victims of sexual abuse while incarcerated shall be referred for tests for sexually transmitted infections as medically appropriate.

Policy 14-02 Sexual Abuse Prevention and Response states that QMHP shall attempt to conduct a mental health evaluation of all know inmate on inmate abusers within sixty (60) days of learning of such abuse history and offer treatment deemed appropriate. If the inmate refuses a mental health evaluation, the refusal will be documented on the 13-49B Refusal to Accept Medical Treatment and placed in the medical record.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist  
Policy 14-02 Sexual Abuse Prevention and Response  
Policy 13-79 Sexual Assault Response  
Attempts at MOU with Center for Community Solutions  
Advocacy Pamphlet, English and Spanish  
Policy Change Notice  
5-1A Incident Report  
14-2B Sexual Abuse Screening Tool  
Medical and Mental Health Follow Up  
Sexually Transmitted Disease Testing

<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 262 560 293"><b>Auditor Discussion</b></p> <p data-bbox="256 338 1477 663">(a) Policy 14-02 Sexual Abuse Prevention and Response states that the Warden/ Facility Administrator will ensure that a post investigation review of a sexual abuse incident is conducted at the conclusion of every sexual abuse investigation, unless the allegation has been determined to be unfounded. In addition, to the Warden/ Facility Administrator the incident review team shall include upper-level facility management and the facility SART with input from line supervisors, investigators, and medical or mental health practitioners. Such review shall ordinarily within thirty (30) days of the conclusion of the investigation.</p> <p data-bbox="256 714 1374 831">In the past twelve (12) months, the PAQ indicated that there have been 28 administrative investigations of alleged sexual abuse completed at the facility, excluding 'unfounded' incidents.</p> <p data-bbox="256 882 1434 999">(b) Policy 14-02 Sexual Abuse Prevention and Response states that an incident review team will review the incident within thirty (30) days of the conclusion of the investigation.</p> <p data-bbox="256 1050 1450 1211">(c) Policy 14-02 Sexual Abuse Prevention and Response states that in addition to the administrator/director, the incident review team shall include upper-level facility management, with input from line supervisors, investigators and medical or mental health practitioners.</p> <p data-bbox="256 1263 1406 1335">(d) Policy 14-02 Sexual Abuse Prevention and Response states that the incident review team shall:</p> <ol data-bbox="256 1386 1453 1839" style="list-style-type: none"> <li>1. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;</li> <li>2. Consider whether the incident or allegation was motivated by race, ethnicity, gender identity, LGBTI and/or gender non-conforming identification, status or perceived status, or gang affiliation, or was motivated or otherwise caused by other group dynamics at the facility;</li> <li>3. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;</li> <li>4. Assess the adequacy of staffing levels in that area during different shifts; and</li> <li>5. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.</li> </ol> <p data-bbox="256 1879 1458 2036">Further, policy states that all findings and recommendations for improvement will be documented on the 14-2-F Sexual Abuse Incident Review Report. Completed forms will be forwarded to the Administrator/Director, the PCM, and the FSC PREA Compliance Coordinator.</p>

(e) Policy 14-02 Sexual Abuse Prevention and Response states that the facility shall implement the recommendations for improvement or shall document reasons for not doing so.

Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:

PREA Standards Compliance Checklist

Policy 14-02 Sexual Abuse Prevention and Response

Sexual Abuse or Assault Incident Review Form

Interview with PREA Coordinator

14-2F Sexual Abuse Incident Review Report

5-1H Incident Packet Checklist

Interview with Incident Review Team Member

Interview with PREA Compliance Manager

Investigation Sample



<b>115.87</b>	<p data-bbox="240 91 1503 1673"><b>Data collection</b></p> <p data-bbox="240 165 1503 241"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 241 1503 318"><b>Auditor Discussion</b></p> <p data-bbox="240 318 1503 629">(a) Policy 14-02 Sexual Abuse Prevention and Response states that at least annually, CoreCivic shall aggregate the incident-based sexual abuse data. These shall include, at a minimum the data necessary to answer all questions from the most recent versions of the Survey of Sexual Victimization conducted by the Department of Justice. Upon request, CoreCivic shall provide all such data from the previous calendar year to the Department of Justice no later than June 30th or at a date requested by that Department.</p> <p data-bbox="240 629 1503 792">(b) Policy 14-02 Sexual Abuse Prevention and Response states that the aggregated data will, at a minimum, include all categories of data necessary to respond to the Survey of Sexual Violence as directed by the Department of Justice.</p> <p data-bbox="240 792 1503 1048">(c) Policy 14-02 Sexual Abuse Prevention and Response states that all case records associated with claims of sexual abuse, including incident reports, investigative reports, inmate information, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment and/or counseling shall be retained in accordance with the facility's record retention policies.</p> <p data-bbox="240 1048 1503 1211">(f) Policy 14-02 Sexual Abuse Prevention and Response states that upon request, CoreCivic shall provide all data as outlined above in T.1.a.ii.-iii. from the previous calendar year to the Department of Justice no later than June 30.</p> <p data-bbox="240 1211 1503 1288">The facility will respond to the SSV if selected by the DOJ to do so.</p> <p data-bbox="240 1288 1503 1406">Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:</p> <p data-bbox="240 1406 1503 1673">           PREA Standards Compliance Checklist            Policy 14-02 Sexual Abuse Prevention and Response            CoreCivic 2019 Annual PREA Report            CoreCivic 2020 Annual PREA Report            CoreCivic 2021 Annual PREA Report         </p>
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<b>115.88</b>	<b>Data review for corrective action</b>
	<p data-bbox="256 188 986 224"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 558 300"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1481 582">(a) Policy 14-02 Sexual Abuse Prevention and Response states the FSC PREA Coordinator shall review all aggregated sexual abuse data collected in order to assess and improve the effectiveness of its sexual abuse prevention, detections and response policies, practices and training, to include: Identifying problem areas; Taking corrective action on an ongoing basis; and Preparing an annual report of findings and corrective actions for each facility, as well as CoreCivic as a whole.</p> <p data-bbox="256 631 1422 792">(b) Policy 14-02 Sexual Abuse Prevention and Response states such report shall include a comparison of the current year’s data and corrective actions with those from prior years and shall provide an assessment of CoreCivic’s progress in addressing sexual abuse.</p> <p data-bbox="256 842 1437 958">(c) Policy 14-02 Sexual Abuse Prevention and Response states CoreCivic’s report shall be approved by the company’s Chief Corrections Officer and made readily available to the public through CoreCivic website.</p> <p data-bbox="256 1008 1457 1169">(d) Policy 14-02 Sexual Abuse Prevention and Response states specific material may be redacted from the reports when publication would present a clear and specific threat to the safety and security of a facility, but the nature of the material redacted must be indicated.</p> <p data-bbox="256 1218 1469 1576">During an interview with CoreCivic Vice President, Operations Administration, he stated he reviews and approves annual reports written as per this standard. Further, he stated that PREA data is reviewed on a daily, monthly, and annual basis. Incident data is provided daily to select FSC staff in a daily PREA report. Monthly and annually the data is reported as metrics in a format that can determine if there are trends at individual facilities or with inmate populations. Facilities can use the data to identify where sexual abuse may be occurring and whether changes to either physical plant, presence of staff/video coverage, or procedures would minimize the risks of incidents in those areas.</p> <p data-bbox="256 1626 1433 1742">The PC for the agency stated that all reports do not contact any identifying or personal information for the inmates and/or staff involved. Corrective action is and could be ongoing and could be facility specific, contract specific or agency wide.</p> <p data-bbox="256 1769 1437 1845">Documents Reviewed, Interviews Conducted, and Observations that helped auditor reach finding:</p> <p data-bbox="256 1895 999 2056">PREA Standards Compliance Checklist  Policy 14-02 Sexual Abuse Prevention and Response  CoreCivic 2019 Annual PREA Report  CoreCivic 2020 Annual PREA Report</p>

	CoreCivic 2021 Annual PREA Report
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	CoreCivic Website
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	Interviews, PC and VP
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<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Sexual Abuse information and the CoreCivic Annual reports from 2013 to the present are located at the following:</p> <p><a href="https://www.corecivic.com/the-prison-rape-elimination-act-of-2003-prea">https://www.corecivic.com/the-prison-rape-elimination-act-of-2003-prea</a></p> <p>Audit reports and facility specific PREA information is located at the following:</p> <p><a href="https://www.corecivic.com/facilities/nevada-southern-detention-center">https://www.corecivic.com/facilities/nevada-southern-detention-center</a></p>

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>All information for CoreCivic PREA Related topics is located at:</p> <p><a href="https://www.corecivic.com/the-prison-rape-elimination-act-of-2003-prea">https://www.corecivic.com/the-prison-rape-elimination-act-of-2003-prea</a></p> <p>This includes all audit reports on the facility specific pages and annual reports from 2013 through 2021.</p>

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The agency has published on its agency website and has made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT.</p> <p>For this facility, the PREA audit reports are publicly available at the following:</p> <p><a href="https://www.corecivic.com/facilities/nevada-southern-detention-center">https://www.corecivic.com/facilities/nevada-southern-detention-center</a></p>

<b>Appendix: Provision Findings</b>		
<b>115.11 (a)</b>	<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
<b>115.11 (b)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
<b>115.11 (c)</b>	<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
<b>115.12 (a)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na

<b>115.12 (b)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na



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

	for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
<b>115.13 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
<b>115.13 (d)</b>	<b>Supervision and monitoring</b>	
	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

<b>115.14 (a)</b>	<b>Youthful inmates</b>	
	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
<b>115.14 (b)</b>	<b>Youthful inmates</b>	
	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
<b>115.14 (c)</b>	<b>Youthful inmates</b>	
	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
<b>115.15 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	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

<b>115.15 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
<b>115.15 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
<b>115.15 (e)</b>	<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

<b>115.15 (f)</b>	<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

<b>115.16 (a)</b>	<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 aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication	yes

	with inmates with disabilities including inmates who: Have intellectual disabilities?	
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
<b>115.16 (b)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
<b>115.16 (c)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes

<b>115.17 (a)</b>	<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
<b>115.17 (b)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether 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
<b>115.21 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

<b>115.21 (b)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
<b>115.21 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
<b>115.21 (d)</b>	<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? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes

<b>115.21 (e)</b>	<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
<b>115.21 (f)</b>	<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 agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
<b>115.21 (h)</b>	<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 always makes a victim advocate from a rape crisis center available to victims.)	yes
<b>115.22 (a)</b>	<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
<b>115.22 (b)</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 the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	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

<b>115.31 (b)</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
<b>115.31 (c)</b>	<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
<b>115.31 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.32 (a)</b>	<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
<b>115.32 (b)</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) 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) 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) Inmate education</b>		
	Have all inmates received the comprehensive education referenced in 115.33(b)?	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
<b>115.33 (d) Inmate education</b>		
	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

<b>115.33 (e)</b>	<b>Inmate education</b>	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
<b>115.33 (f)</b>	<b>Inmate education</b>	
	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
<b>115.34 (a)</b>	<b>Specialized training: Investigations</b>	
	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 receive 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
<b>115.34 (b)</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



<b>115.34 (c)</b>	<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
<b>115.35 (a)</b>	<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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	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 or the agency does not employ medical staff.)	yes

<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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	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
<b>115.41 (c)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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

<b>115.41 (e)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as 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, as 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, as known to the agency: history of prior institutional violence or sexual abuse?	yes
<b>115.41 (f)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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
<b>115.41 (g)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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 an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
<b>115.41 (h)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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) 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) Use of screening information</b>		
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
<b>115.42 (c) Use of screening information</b>		
	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

<b>115.42 (d)</b>	<b>Use of screening information</b>	
	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
<b>115.42 (e)</b>	<b>Use of screening information</b>	
	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
<b>115.42 (f)</b>	<b>Use of screening information</b>	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
<b>115.42 (g)</b>	<b>Use of screening information</b>	
	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? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	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? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	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? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes

<b>115.43 (a)</b>	<b>Protective Custody</b>	
	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
<b>115.43 (b)</b>	<b>Protective Custody</b>	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes

<b>115.43 (c)</b>	<b>Protective Custody</b>	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
<b>115.43 (d)</b>	<b>Protective Custody</b>	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
<b>115.43 (e)</b>	<b>Protective Custody</b>	
	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
<b>115.51 (a)</b>	<b>Inmate reporting</b>	
	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



<b>115.51 (b)</b>	<b>Inmate reporting</b>	
	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? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes
<b>115.51 (c)</b>	<b>Inmate reporting</b>	
	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
<b>115.51 (d)</b>	<b>Inmate reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
<b>115.52 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	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

<b>115.52 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes

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

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

<b>115.53 (a)</b>	<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? (N/A if the facility never has persons detained solely for civil immigration purposes.)	yes
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
<b>115.53 (b)</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
<b>115.53 (c)</b>	<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
<b>115.54 (a)</b>	<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

<b>115.61 (a)</b>	<b>Staff and agency reporting duties</b>	
	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
<b>115.61 (b)</b>	<b>Staff and agency reporting duties</b>	
	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
<b>115.61 (c)</b>	<b>Staff and agency reporting duties</b>	
	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
<b>115.61 (d)</b>	<b>Staff and agency reporting duties</b>	
	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

<b>115.64 (a)</b>	<b>Staff first responder duties</b>	
	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
<b>115.64 (b)</b>	<b>Staff first responder duties</b>	
	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
<b>115.65 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes



<b>115.66 (a)</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
<b>115.67 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
<b>115.67 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

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

<b>115.67 (d)</b>	<b>Agency protection against retaliation</b>	
	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

<b>115.73 (c)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (d)</b>	<b>Reporting to inmates</b>	
	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
<b>115.77 (a)</b>	<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
<b>115.77 (b)</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

<b>115.78 (a)</b>	<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
<b>115.78 (b)</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
<b>115.78 (c)</b>	<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>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes



<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? (N/A if the facility is not a prison).	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? (N/A if the facility is not a jail).	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. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	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. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	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

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

<b>115.87 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.87 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
<b>115.87 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
<b>115.88 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
<b>115.88 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
<b>115.88 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes

<b>115.88 (d)</b>	<b>Data review for corrective action</b>	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
<b>115.89 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
<b>115.89 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
<b>115.89 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.89 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes

<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a “no” response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes



<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	<p>The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)</p>	yes