

# PREA Facility Audit Report: Final

**Name of Facility:** Whiteville Correctional Facility

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** 12/08/2025

**Date Final Report Submitted:** 03/06/2026

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> Bryan Pearson	<b>Date of Signature:</b> 03/06/2026

AUDITOR INFORMATION	
<b>Auditor name:</b>	Pearson, Bryan
<b>Email:</b>	bryan@pearsongroupllc.com
<b>Start Date of On-Site Audit:</b>	10/21/2025
<b>End Date of On-Site Audit:</b>	10/23/2025

FACILITY INFORMATION	
<b>Facility name:</b>	Whiteville Correctional Facility
<b>Facility physical address:</b>	1440 Union Springs Road , Whiteville, Tennessee - 38075
<b>Facility mailing address:</b>	P.O. Box 679, Whiteville , Tennessee - 38075

Primary Contact
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<b>Name:</b>	Tameka Young
<b>Email Address:</b>	Tameka.Young@Corecivic.Com
<b>Telephone Number:</b>	731-254-9400 Ext. 40

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Robert Adams
<b>Email Address:</b>	Robert.AdamJr@corecivic.Com
<b>Telephone Number:</b>	731-433-9502

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	Tameka Young
<b>Email Address:</b>	tameka.young@corecivic.com
<b>Telephone Number:</b>	(731) 361-9727
<b>Name:</b>	Kari Kaiser
<b>Email Address:</b>	kari.kaiser@corecivic.com
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<b>Facility Health Service Administrator On-site</b>	
<b>Name:</b>	Jammie Garner
<b>Email Address:</b>	Jammie.Garner@Corecivic.Com
<b>Telephone Number:</b>	731-254-9400 Ext. 4

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	1613
<b>Current population of facility:</b>	1495
<b>Average daily population for the past 12 months:</b>	1500

<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>What is the facility's population designation?</b>	Men/boys
<b>Age range of population:</b>	18 - 80
<b>Facility security levels/inmate custody levels:</b>	Minimum - Medium
<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>	361
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	10
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	18

### AGENCY INFORMATION

<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>	615-263-3000

### Agency Chief Executive Officer Information:

<b>Name:</b>	Damon T. Hininger
<b>Email Address:</b>	
<b>Telephone Number:</b>	615-263-3000

Agency-Wide PREA Coordinator Information			
<b>Name:</b>	Jillian Shane	<b>Email Address:</b>	jillian.shane@corecivic.com

## Facility AUDIT FINDINGS

### Summary of Audit Findings

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.

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.

Number of standards exceeded:	
2	<ul style="list-style-type: none"> <li>• 115.31 - Employee training</li> <li>• 115.73 - Reporting to inmates</li> </ul>
Number of standards met:	
43	
Number of standards not met:	
0	

## POST-AUDIT REPORTING INFORMATION

Please note: Question numbers may not appear sequentially as some questions are omitted from the report and used solely for internal reporting purposes.

### GENERAL AUDIT INFORMATION

#### On-site Audit Dates

1. Start date of the onsite portion of the audit: 2025-10-21

2. End date of the onsite portion of the audit: 2025-10-23

#### 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?

Yes  
 No

a. Identify the community-based organization(s) or victim advocates with whom you communicated:

An interview was conducted by phone with a Director at Wo/Men's Resource and Rape Assistance Program (WRAP) to verify the MOU with WCF and the services WRAP agreed to provide. She said WRAP would respond to the Jackson General Hospital to provide victim advocate services to an inmate at the forensic examination if requested. WRAP advocates were available to inmates on their hotline for emotional support services. She said an advocate could come to the facility for a special visit with a victim or support for investigative interviews.

### AUDITED FACILITY INFORMATION

14. Designated facility capacity: 1613

15. Average daily population for the past 12 months: 1500

16. Number of inmate/resident/detainee housing units: 25

<p><b>17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)</p>
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**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**

<p><b>23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b></p>	<p>1514</p>
<p><b>24. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>25. 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></p>	<p>6</p>
<p><b>26. 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></p>	<p>0</p>
<p><b>27. 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></p>	<p>0</p>

<b>28. 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>29. 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>	1
<b>30. 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>	0
<b>31. 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>	1
<b>32. 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>	13
<b>33. 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>	2
<b>34. 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>	0

<p><b>35. 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>Several requests were made for a list of inmates that were GBTI, disabled, LEP, reported prior victimization, or had reported sexual abuse at WCF. A list was not ready on the first day of the audit. The facility was not tracking this information. Information was gathered by the second day of the audit for inmate interviews. Inmates were not identified for all categories due to them not being tracked.</p>
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**Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit**

<p><b>36. 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>361</p>
<p><b>37. 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>18</p>
<p><b>38. 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>10</p>
<p><b>39. 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>No text provided.</p>

**INTERVIEWS**

**Inmate/Resident/Detainee Interviews**

**Random Inmate/Resident/Detainee Interviews**

<p><b>40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>19</p>
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<p><b>41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b></p>	<p><input type="checkbox"/> Age</p> <p><input type="checkbox"/> Race</p> <p><input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</p> <p><input type="checkbox"/> Length of time in the facility</p> <p><input checked="" type="checkbox"/> Housing assignment</p> <p><input type="checkbox"/> Gender</p> <p><input type="checkbox"/> Other</p> <p><input type="checkbox"/> None</p>
<p><b>42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b></p>	<p>Inmates were not selected for interviews based on geographical diversity because then their selection would not be random anymore.</p>
<p><b>43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>44. 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></p>	<p>Inmates were randomly selected from each housing unit to ensure an inmate from every housing unit was interviewed. Twenty were selected but nineteen were counted as random because one became a targeted interview based on information the inmate reported.</p>
<p><b>Targeted Inmate/Resident/Detainee Interviews</b></p>	
<p><b>45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>21</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>46. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful 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/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/detainees.</p> <p><input type="checkbox"/> The inmates/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/detainees).</b></p>	<p>Whiteville CF does not house youthful inmates.</p>
<p><b>47. 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></p>	<p>5</p>

<p><b>48. 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>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>The facility staff was asked if there were any inmates with cognitive disabilities and reported there were no inmates with cognitive disabilities.</p>
<p><b>49. 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>The facility staff was asked if there were any inmates with visual disabilities and reported there were no inmates with visual disabilities.</p>
<p><b>50. 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>The facility staff was asked if there were any inmates with hearing disabilities and reported there were no inmates with hearing disabilities.</p>
<p><b>51. 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>1</p>
<p><b>52. 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>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>The facility staff was asked if there were any inmates that were gay or bisexual and reported there were no inmates that were gay or bisexual.</p>
<p><b>53. 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>1</p>
<p><b>54. 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>12</p>
<p><b>55. 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>2</p>
<p><b>56. 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>The facility said there were no inmates placed involuntarily in segregation for being high risk of victimization or for reporting sexual abuse.</p>
<p><b>57. 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>Several requests were made for a list of inmates that were GBTI, disabled, LEP, reported prior victimization, or had reported sexual abuse at WCF. A list was not ready on the first day of the audit. The facility was not tracking this information. Information was gathered by the second day of the audit for inmate interviews. Inmates were not identified for all categories due to them not being tracked.</p>
<p><b>Staff, Volunteer, and Contractor Interviews</b></p>	
<p><b>Random Staff Interviews</b></p>	
<p><b>58. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>12</p>
<p><b>59. 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 checked="" 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>60. 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>61. 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>No text provided.</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>62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b></p>	<p>14</p>
<p><b>63. 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>64. 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>
<p><b>65. Were you able to interview the PREA Coordinator?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>66. Were you able to interview the PREA Compliance Manager?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><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)</p>

**67. 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
- Intake staff

	<input type="checkbox"/> Other
<b>68. 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>69. 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
<b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input checked="" type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
<b>70. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	No text provided.

## 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.

**71. Did you have access to all areas of the facility?**

Yes

No

**Was the site review an active, inquiring process that included the following:**

**72. 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)?**

Yes

No

**73. 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)?**

Yes

No

**74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?**

Yes

No

**75. Informal conversations with staff during the site review (encouraged, not required)?**

Yes

No

<p><b>76. 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></p>	<p>No text provided.</p>
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**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.

<p><b>77. 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></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
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<p><b>78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</b></p>	<p>Lists for staff, contract staff, volunteers, and inmates received in the last 12 months were requested six weeks prior to the onsite audit for the auditor to select staff and inmates for document review. The lists were provided after a second request two weeks prior to the onsite audit. Selections were made on each list and immediately returned to the facility with instructions on what documents were required for review. Most of the documents were not provided until the onsite audit or after the onsite audit. This reduced the amount of information the auditor had to determine standards compliance prior to the onsite audit.</p>
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**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.

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
<b>Inmate-on-inmate sexual abuse</b>	12	2	12	2
<b>Staff-on-inmate sexual abuse</b>	13	8	13	8
<b>Total</b>	25	10	25	10

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
<b>Inmate-on-inmate sexual harassment</b>	3	0	3	3
<b>Staff-on-inmate sexual harassment</b>	2	1	2	2
<b>Total</b>	5	1	5	5

## 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.

#### 81. 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	1	0	0	0
<b>Staff-on-inmate sexual abuse</b>	0	2	3	0	0
<b>Total</b>	0	3	3	0	0

#### 82. Administrative SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	0	5	6	1
<b>Staff-on-inmate sexual abuse</b>	0	4	1	8
<b>Total</b>	0	9	7	9

### 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.

**83. 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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	0	0	3	0
<b>Staff-on-inmate sexual harassment</b>	0	0	2	0
<b>Total</b>	0	0	5	0

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

**Sexual Abuse Investigation Files Selected for Review**

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

20

<p><b>86. 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 type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p><b>Inmate-on-inmate sexual abuse investigation files</b></p>	
<p><b>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>10</p>
<p><b>88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" 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>
<p><b>89. 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>
<p><b>Staff-on-inmate sexual abuse investigation files</b></p>	
<p><b>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>10</p>
<p><b>91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" 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>

<p><b>92. 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>
<p><b>Sexual Harassment Investigation Files Selected for Review</b></p>	
<p><b>93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>4</p>
<p><b>94. 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 type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p><b>Inmate-on-inmate sexual harassment investigation files</b></p>	
<p><b>95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>2</p>
<p><b>96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" 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>
<p><b>97. 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>

<b>Staff-on-inmate sexual harassment investigation files</b>	
<b>98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	2
<b>99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>100. 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>101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</b>	No text provided.
<b>SUPPORT STAFF INFORMATION</b>	
<b>DOJ-certified PREA Auditors Support Staff</b>	
<b>102. 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

## Non-certified Support Staff

**103. 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

**108. 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

<b>Standards</b>
<b>Auditor Overall Determination Definitions</b>
<ul style="list-style-type: none"> <li>• Exceeds Standard (Substantially exceeds requirement of standard)</li> <li>• Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period)</li> <li>• Does Not Meet Standard (requires corrective actions)</li> </ul>
<b>Auditor Discussion Instructions</b>
<p>Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.</p>

<b>115.11</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a) The Whiteville Correctional Facility provided the CoreCivic policy 14-100 Sexual Abuse Prevention and Response, effective date April 1, 2025, as the policy that outlines how the facility will implement CoreCivic’s approach to preventing, detecting, and responding to sexual abuse and sexual harassment. The policy states “CoreCivic has zero tolerance toward all forms of sexual abuse and sexual harassment.” The policy provides definitions of sexual abuse or sexual harassment by an employee, contractor or civilian and sexual abuse or sexual harassment by an inmate. The definitions mirror the definitions provided in the PREA standards. The policy provides Whiteville CF staff direction for prevention, detection and response to sexual abuse and sexual harassment. The policy covers all PREA standards for prisons in the same order as the USDOJ standards.</p> <p>Inmate Interviews – 40 inmates were interviewed during the onsite audit. Most inmates interviewed said they were provided with the facility’s zero tolerance policy toward sexual abuse and sexual harassment through the PREA brochure and handbook.</p>

Random Staff Interviews - 12 staff were selected at random from shift rosters from both shifts and interviewed during the onsite audit. All staff said they were provided with the facility's zero tolerance policy during annual training and said the policy requires them to report all knowledge or suspicion of sexual abuse or sexual harassment, retaliation, or staff failure to report. Staff demonstrated knowledge from the PREA training of CoreCivic's approach to preventing, detecting and responding to reports of sexual abuse and sexual harassment. Staff could identify signs of sexual abuse and know how to respond to reports. Staff are given a quick reference card that provides the steps to follow in response to a report of sexual abuse or sexual harassment.

b) The CoreCivic policy 14-100 requires a Senior Director of PREA Compliance to be the PREA Coordinator for the agency. This position is an upper-level management employee responsible for "the development, implementation, and oversight of CoreCivic's efforts to comply with PREA Standards and the agency Sexual Abuse Response and Prevention Program."

PREA Coordinator Interview - The PREA Coordinator stated during her interview that she has sufficient time and authority to manage the agency's efforts to comply with the PREA standards in all of CoreCivic's facilities. She reports directly to the Vice President of Core Services.

Organizational Chart Review - The CoreCivic organizational chart was provided for review in the Pre-Audit Questionnaire. It shows the Senior Director of the PREA Programs & Compliance division reporting directly to the Vice President of Core Services.

c) The Whiteville CF Assistant Warden of Treatment is designated as the PREA Compliance Manager for the facility by the Warden in a memorandum. The Whiteville Correctional Facility provided an organizational chart for review. The Assistant Warden reports Directly to the Warden. All staff interviewed were aware that the Assistant Warden of Treatment was the PCM for the facility.

PCM Interview - The Assistant Warden of Treatment was interviewed as the PREA Compliance Manager at the onsite audit. She stated she has the time and authority to manage PREA compliance duties at the facility. He has assistance from the Quality Assurance Manager and Quality Assurance Coordinator as well.

Based on the information obtained from the review of policy, interviews with the PREA Coordinator and PREA Compliance Manager, CoreCivic and Whiteville CF CF organizational charts, the facility meets this standard.

<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>Warden Interview - During his interview, the Warden stated that Whiteville Correctional Facility does not contract with other entities for the confinement of its inmates. However, CoreCivic has been contracted by the Tennessee Department of Corrections to house their inmates in Whiteville Correctional Facility.</p> <p>Document Review - The contract was provided for review and requires CoreCivic to be PREA complaint.</p> <p>Based on the Warden's interview and documents provided, this standard is not applicable to Whiteville Correctional Facility.</p>
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<b>115.13</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a, c) Policy Review - The CoreCivic policy 14-100, Sexual abuse prevention response requires an annual review of the staffing plan. The review is based on the 11 factors required by the standard. The prior compliance manager is required to complete A14-100I annual PREA staffing plan assessment form and forward it to the Warden for review. Following approval by the Warden, the 14-100I form is forwarded to the CoreCivic PREA Coordinator for review. The policy requires the PREA Coordinator to assess and determine if any adjustments are needed to the staffing plan, the facility's deployment of video monitoring systems and the resources the facility has to comply with the PREA standards. It was reported on the pre-audit questionnaire that the staffing plan is based on a 1536 inmate population and the facility had a daily average of 1502 inmates since the last audit.</p> <p>Document Review - The form 14-100I PREA Staffing Plan Assessment for 2025, 2024 and 2023 were provided for review. The Annual PREA Staffing Plan Assessment form provides the information that covers the eleven factors in the standard in the Staffing Plan Review Checklist section. A review of Video Monitoring is covered in three questions in another section. The review form was completed by the PREA Compliance Manager, reviewed by the Warden and the PREA Coordinator. The staffing plan documents reviewed were the facility organization chart and the WCF 2025 PREA Staffing Plan that provided the number of security positions required in all areas of the facility.</p> <p>PCM Interview - The PREA Compliance Manager stated the staffing levels and vacancies are reviewed on a weekly basis in addition to the required annual staffing plan review. The review is documented on a CoreCivic form 14-100I and forwarded to the Warden for review and signature. The review is then sent to the CoreCivic PREA Coordinator for review and signature.</p> <p>Warden Interview - The Warden said the staffing is reviewed daily with HR and annually as required by the standard. The staffing plan focuses on security posts for</p>

proper supervision of the inmate population in all areas of the facility. Some posts are discretionary and can be closed due to a staff shortage from call-ins and most are mandatory posts that will be filled with staff working overtime. A mandatory post closing would be considered a deviation from the staffing plan. He said there were no deviations from the staffing plan during the year. If there was a deviation, he is required to complete a 5-1B form and send it to FSC. The frequency and type of PREA incidents are taken into consideration to determine if there is a need for a change in or addition to staff coverage of an area. The staffing at WCF is determined by the contract with Tennessee DOC. Changes to staffing would require the approval of TDOC and CoreCivic central office.

Tour Observations – Staff were observed in all areas of the facility supervising inmates. All housing units had assigned staff actively monitoring inmates. Cameras were observed throughout the facility in hallways, inmate dayrooms, foodservice, laundry, commissary, chapel, recreation areas, and medical. Staff offices where inmates are allowed had windows that allowed staff to monitor inmate interactions. All classrooms had a window in the door. Given the small size of the window, it is recommended that cameras be placed inside the classrooms for monitoring in addition to the assigned officer rounds. There were no cameras inside of any cells. This was verified by checking the camera system views.

Correction Required: Two blind spots were identified on the tour. One was a solid door inmate bathroom in the kitchen that locked from the inside. Another was a solid door inmate bathroom in a main hallway outside the laundry that was unlocked but could be locked from the inside. The inside locks on both doors must be removed. Both also need a window added to the door that does not allow cross gender viewing or the door be maintained locked with staff allowing access to the bathroom to inmates as needed. The lock on the door in the kitchen was removed during the onsite audit and verified by this auditor. Pictures were also provided for documentation.

**Corrective Action Completed:** Pictures were provided of the inside of the door with the locks removed. A memorandum from the Warden to all staff instructing them to maintain all bathroom doors for inmates and staff to stay locked at all times. Staff are to provide access to inmates and monitor the amount time they are accessing the bathroom. These two actions will eliminate the blind spot. This correction is completed.

b) Policy Review – CoreCivic policy 14-100 states “The PREA Compliance Manager/designee shall document deviations from the PREA Staffing Plan and describe the deviation on a 5-1B Notice to Administration (NTA), along with a thorough justification for the deviation and description of any corrective action that was taken to resolve the deviation.” The policy meets the requirements of the provision.

Warden Interview – The Warden described a deviation from the staffing plan as the closure of a mandatory post requiring restricted movement. Discretionary posts are in addition to the staffing plan. If a mandatory post is not filled with overtime, the ADO is notified as well as the Warden. The Warden reviews the shift report daily for

	<p>deviations. He said there have been no deviations during this year.</p> <p>d) Policy Review – CoreCivic policy 14-100 states “Intermediate level and/or higher-level facility supervisors shall conduct unannounced facility rounds to identify and deter staff sexual abuse and sexual harassment. The occurrence of such rounds shall be documented as an unannounced round or "PREA Rounds" in the applicable log (e.g., ADO, post log, shift report, etc.). Rounds are to be conducted on both day and night shifts. Employees are prohibited by this policy from alerting other staff of the unannounced rounds. The policy meets the requirements of the provision.</p> <p>Document Review – Documentation of unannounced rounds was requested for two days in five months during the review period. Unannounced rounds by shift supervisors and assistant shift supervisors were documented on a Facility/Unit Log Report for all shifts in all housing units for each date selected.</p> <p>Staff Interview – A Captain that is a shift supervisor was interviewed regarding unannounced rounds. He stated he completes unannounced rounds at different times each day and visits a different unit each time. If staff were found to be alerting other staff of the unannounced rounds, they would be subject to discipline.</p> <p>Based on the policy and documents reviewed, tour observations, and interviews, the facility meets the standard.</p>
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<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Whiteville Correctional Facility provided TDOC policy 506.14.2 Housing and Programming of Juvenile Offenders that provides a list of facilities that are designated as housing juvenile offenders. Whiteville Correctional Facility is not on the list for housing juveniles. The PCM said the facility is not allowed to house juvenile or youthful offenders. The TDOC contract with CoreCivic for the Whiteville Correctional Facility indicates the inmates are adult male. None of the inmates interviewed were found to be under the age of 18.</p> <p>Based on the documentation provided and observations, this standard is not applicable to Whiteville Correctional Facility.</p>

<b>115.15</b>	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

a) Policy Review – CoreCivic policy 14-100 requires exigent circumstances for cross gender strip searches and cross gender visual body cavity searches. Body cavity searches are to only be performed by a designated qualified medical professional. The facility has a body scanner that can be utilized in place of a body cavity search however it is not mentioned in the policy. The policy meets this provision of the standard.

Tour Observation – Strip searches are conducted in cells in the intake area. Female staff are not allowed in the area to observe the strip searches and could not see a strip search being conducted through any window.

Inmate Interviews – All inmates interviewed said female staff never performed a strip search or were within view of them being strip searched.

The facility reported zero cross gender strip searches and zero cross gender visual body cavity searches in the past 12 months on the pre-audit questionnaire.

c) Policy Review - CoreCivic policy 14-100 requires all cross-gender strip searches and cross gender visual body cavity searches to be documented in a log and on a form 5-1B Notice to Administration with details of the exigent circumstance provided. The policy meets the requirements of this provision of the standard.

The facility stated on the pre-audit questionnaire there were no instances of cross-gender strip searches or cross gender visual body cavity searches.

d) Policy Review - CoreCivic policy 14-100 requires the facility to allow inmates to shower or use toilets without opposite gender staff viewing their genitalia or buttocks, unless the viewing is incidental to security checks. Opposite gender staff are required to make an announcement prior to entering housing unit pods. The policy meets the requirements of this provision of the standard.

Tour Observations – During the tour of the facility, all housing units were visited, and shower areas reviewed for possible cross gender views. All showers were found to have shower curtains that provided modesty screens that blocked viewing of inmate’s genitals or buttocks without creating a blind spot. The shower in restricted housing units was a solid stainless steel door that blocked the view of an inmate’s genitals and buttocks during showers. All shower areas had a half wall in front of them to provide additional cover from viewing in the dayroom area. Toilets were in cells facing away from the door. Inmates were required to close their door to use the toilet. Cross gender viewing of toilets would be incidental if a female officer was doing count or a security check briefly looking into the window if an inmate didn’t cover up. Housing units had separate pods/wings that have a door that must be opened for entry. The facility required female staff to make a verbal announcement each time they entered a pod/wing. Signs were observed at each pod/wing door that stated, “opposite gender must announce upon entry.” Female staff were observed making an announcement when they entered every pod during the tour. The medical area had four cells. The cell had a toilet with a wall next to it that provided proper cover. The shower was in a room with a solid door in the medical unit hallway that was locked and had controlled access to one inmate at a time.

	<p>Correction Required: The intake cells could hold several inmates during processing. Each cell had a toilet that was next to a full-length window that went from the floor to head height. This would allow anyone to see an inmate’s buttocks while sitting on the toilet. Closing the door provided no cover. Female staff were present in this area to provide the inmates PREA information. The facility was asked to block the view in the area of the window where the toilet can be seen.</p> <p><b>Corrective Action Completed:</b> Pictures were provided that show the full-length window in front of the toilet in the intake holding cells were blocked at the level of the toilet preventing opposite gender staff from being able to see an inmate while using the toilet.</p> <p>Inmate Interviews – All inmates reported having enough privacy to use the use the showers without being seen by female staff. Some inmates said they could place a “flag” in the lower part of the cell door window to block staff view while they use the toilet, however it must be removed once they are done. All inmates said they could hear female staff make an announcement when entering the pod as required.</p> <p>Staff Interviews – During random staff interviews, all staff said they were aware female staff were required to make an announcement prior to entering a wing/pod. Female staff said they make an announcement every time they enter a wing/pod. Male staff said they observe female staff making the announcements. All staff said the inmates had enough privacy or modesty screens that prevent staff from seeing an inmate’s genitals or buttocks during showers. Staff said the inmates close their door while using the toilet in their cell.</p> <p>Based on policy and document review, interviews and tour observations, the facility meets all provisions of this standard.</p>
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<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) CoreCivic policy 14-100 states “The facility shall provide inmate education in formats accessible to all inmates, including those who are deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. Appropriate steps shall be taken 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 sexual abuse and sexual harassment.” For inmates that have disabilities the policy states “Inmates who are hearing impaired shall have access to information through simple written 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</p>

when simple written or oral communication is not effective.” For inmates with limited reading skills the policy states “The facility will ensure that information is effectively communicated orally, on an individual basis, to inmates with limited reading skills. In the event that an inmate has difficulty understanding the information 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.”

Agency Head Interview – The Vice President said CoreCivic maintains a contract with Voyce for assistance with hearing impaired inmates with video sign language. He said TTY phones are available at all facilities.

Inmate Interviews – The facility reported no having inmates with cognitive disabilities at the time of the onsite audit.

Intake Education Staff – The Case Manager that provides the PREA education to inmates at intake said she verbally provides the information on how to report sexual abuse and sexual harassment at WCF. She hands out the PREA brochure and handbook that has PREA reporting information and has the inmates sign for it. She said if an inmate has cognitive disabilities that interfere with his ability to understand the PREA information, she will ask mental health staff for assistance in providing the information.

Comprehensive Education Staff Interview – A Case Manager that said she will ask mental health staff for assistance in providing the information if an inmate has cognitive disabilities that interfere with his ability to understand the PREA information.

b) CoreCivic policy 14-100 states “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 inmates who are Limited English Proficient (LEP). The facility may use a translation/interpreter service for this purpose. Interpreters shall be provided who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.”

The facility provided a current contract with Voyce Services to provide language interpretive services in several languages. The contract included American Sign Language through virtual video meeting. A memorandum from the Assistant Wardens to all staff with subject Limited English Proficiency Plan was provided for review. The memorandum instructs the orientation counselor to identify LEP inmates through the intake process and provide assistance with the language service.

Inmate Interview – An inmate that was limited English proficient was interviewed by using the Voyce language interpreter on the telephone. He said that he was provided an interpreter when he was given the information for reporting sexual abuse and sexual harassment at arrival. He was not provided an interpreter again and was not asked questions for the risk assessment. A review of the PREA education and intake documents for this inmate has no interpreter documented for the PREA education.

	<p>Corrective Action Required: The facility was instructed to provide the PREA education and risk assessment to the LEP inmate using an interpreter. Staff the complete inmate PREA education and risk assessments are to be directed to use an interpreter to provide PREA education and conduct risk assessment screenings and document the use of the interpreter.</p> <p><b>Corrective Action Completed:</b> Documentation was provided for a new PREA education and risk assessment screening completed using an interpreter for the LEP inmate. A memorandum was provided to the staff that complete PREA education and risk assessment screening reminding them to use an interpreter for Limited English Proficient inmates and document the interpreter use on the PREA education form.</p> <p>c) CoreCivic policy states “The facility will not utilize inmates 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 safety, the performance of first-responder duties, or the investigation of the inmate's allegations.”</p> <p>Staff Interviews - During random staff interviews, staff stated they would not be allowed to use an inmate interpreter per policy and because it would violate confidentiality. They were all aware there was an interpretive service for communicating with an LEP inmate.</p> <p>Based on the policy and documents reviewed, interviews and observations during the facility tour, the facility meets the provisions of this standard.</p>
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<b>115.17</b>	<b>Hiring and promotion decisions</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>a) Policy Review - CoreCivic policy 14-100 states the agency will decline to hire or promote any individual or decline to utilize contract staff that would have contact with inmates if they have engaged in, been convicted of or civilly adjudicated for sexual abuse in a correctional institution or in the community.</p> <p>Document Review - Twenty-two staff hired in the last 12 months were randomly selected for file review. All Twenty-two had a criminal background check and were asked the required questions about prior sexual abuse at the time of hire on a CoreCivic Self-Declaration form. None had a record of sexual abuse adjudications or provided a positive response to sexual abuse on the self-declaration forms completed at the time of hire. Four contract staff were selected for record review. All four had completed a Core-Civic Self-Declaration form that asked them questions that cover provision a) 1-3.</p> <p>b) CoreCivic policy 14-100 states “Any incident of sexual harassment shall be</p>

considered in determining whether to hire or promote any individual, or to enlist the services of any contractor, who may have contact with inmates.”

HR Interview - The Human Resources manager was asked if incidents of sexual harassment were considered in deciding to hire or promote staff or allow contract staff to provide services at the facility. She said all staff new hires or promotions are asked on the self-declaration form if a substantiated allegation of sexual harassment has been made against them. If there has been, then this would be considered in the decision to hire or promote on an individual basis.

Document Review - Twenty-two CoreCivic Self-Declaration forms were reviewed for staff hired in the last 12 months. All twenty-two had a fourth question applicants had to answer regarding sexual harassment. Completed CoreCivic Self-Declaration forms for four contract staff selected were provided for review. The CoreCivic Self-Declaration form asks if the applicant has had any prior substantiated allegations of sexual harassment. This question is not asked on the Tennessee Self-Declaration form. It is recommended the TDOC add this question to document that the applicant is asked.

c) CoreCivic policy 14-100 requires a criminal background check for all new hire staff that may have contact with inmates and contact prior institutional employers for information on substantiated sexual abuse incidents or resignation during a sexual abuse investigation.

Document Review - Twenty-two staff hired in the last 12 months were randomly selected for file review. All Twenty-two had a completed criminal background check from the Tennessee DOC. One veteran staff member selected for review had prior corrections experience. A completed employment background check was provided.

Human Resources Staff Interview - The HR Manager said all new hire staff have a criminal background check completed prior to hire and if they have prior corrections employment, she contacts the former corrections employer to ask if the applicant had any substantiated sexual abuse allegations or if they resigned during the investigation. She emails the former employer to document the request in case they do not respond.

d) CoreCivic policy 14-100 states “Before hiring new employees or enlisting the service of any contractor who may have contact with inmates, CoreCivic shall ensure that a criminal history record check has been conducted.”

Interview - The HR Manager said a criminal background check is completed on all contract staff prior to them providing services at the facility.

Document Review - Four contract staff files were selected for review. All four had a documented criminal background check completed prior to providing services at the facility.

e) CoreCivic policy 14-100 states “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.”

Interview – The HR Manager monitors and ensures criminal background checks are completed on current staff during the month prior to their hire date every 5 years. She tracks them on a calendar.

Document Review – Twenty-three veteran staff were randomly selected for review. All twenty-three had a criminal background check that was less than 5 years old on file. One contract staff selected for review had been working at WCF for more than five years and had a criminal background check completed a second time.

f) CoreCivic policy 14-100 states “The 14-100H Self-Declaration of Sexual Abuse/ Sexual Harassment form shall be completed 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 described in this policy. The annual signature shall be in lieu of having the form completed as part of an annual review process.”

Interview – The HR Manager said the self-declaration is signed during PREA training each year. The self-declaration includes an affirmative duty to disclose the misconduct from the questions on the form. The employee evaluation process does not require staff to provide a self-evaluation as part of the process.

Document Review – Twenty-three veteran staff self-declaration forms were reviewed. All Twenty-three staff had signed a self-declaration form in each of the last two years verifying an annual process to ask staff about misconduct in provision (a) of the standard. The Self-Declaration form has a statement at the end where staff agree to self-disclose any future misconduct. This is not included on the TDOC self-disclosure form and is recommended to be added.

g) CoreCivic policy 14-100 states “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.”

h) CoreCivic policy 14-100 states “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 former employee has applied to work.”

Interview – The HR Manager said if an institutional employer requests information about a former SCF employee it is handled by a third-party vendor. She may be asked by the vendor to provide information. When former WCF employees are rehired, she contacts the facility investigator to check for prior sexual abuse investigations and documents the check.

Based on the HR Manager interview, policy and documents reviewed, the facility meets the provisions of this standard.

<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 264 544 297"><b>Auditor Discussion</b></p> <p data-bbox="256 342 1465 544">a) Policy Review – CoreCivic policy 14-100 states “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 ability of the facility and company to protect inmates/detainees from sexual abuse.” The policy meets this provision of the standard.</p> <p data-bbox="256 577 1433 741">Interview PCM – The PCM said new recreation pads were added outside of the restricted housing unit. Inmates could be easily monitored through the fencing for each recreation pad. This was the only modification during the review period. The PCM said prevention of sexual abuse would be considered for any modification.</p> <p data-bbox="256 775 1449 938">Warden Interview – The Warden said the facility has not had any substantial expansion or modifications in the last year. He said if there any plans for expansion or modification, the PCM would be involved in the planning to ensure prevention of sexual abuse is considered.</p> <p data-bbox="256 972 1437 1173">b) CoreCivic policy 14-100 states “When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, CoreCivic will consider how such technology may enhance the ability to protect inmates/detainees from sexual abuse.” The policy meets this provision of the standard.</p> <p data-bbox="256 1207 1477 1330">Warden Interview – The Warden said the facility has not updated the video monitoring system. He said based on a PREA review, they identified a need for cameras in the classrooms to aid in monitoring. He has made the request to the CoreCivic FSC.</p> <p data-bbox="256 1364 1398 1442">The facility meets this standard based on information from interviews and policy reviewed.</p>

<b>115.21</b>	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 1729 544 1762"><b>Auditor Discussion</b></p> <p data-bbox="256 1807 1453 1964">a) CoreCivic policy 14-100 states “CoreCivic facilities do not conduct criminal investigations into allegations of sexual abuse, TDOC OIC is responsible for ensuring that the requirements of PREA Standards 115.21 and 115.71 are followed for each criminal investigation.”</p> <p data-bbox="256 1998 1410 2076">The facility attempted an MOU with Jackson General Hospital for forensic examinations in December of 2024. Currently there is no MOU with the hospital.</p>

However, Jackson General Hospital conducted two forensic examinations for two victims, verifying they provide the service through the emergency room.

Staff Interviews – All staff interviewed could describe how to protect possible DNA evidence at both the incident scene and on the inmate victim or perpetrator. Staff said the scene should be closed off to prevent other staff or residents from contaminating DNA evidence. Staff said the victim would be instructed to not eat, drink, brush teeth, change clothes, shower, or use the toilet until evidence could be collected at the local hospital. The alleged perpetrator would be prevented from destroying evidence by staff in the same manner as the victim.

b) A review of the national protocol found the minimum recommended time frame for collecting forensic evidence was 72 hours. CoreCivic policy 13-79 states the time frame for evidence collection is within 72 hours of the assault, which follows the national protocol, with the decision to collect evidence beyond 72 hours being decided by law enforcement. For Whiteville CF that is TDOC Office of Investigations. CoreCivic policy 14-100 Sexual Abuse Prevention requires the TDOC OIC Investigators to follow an investigative process that follows the requirements of standard 115.21 and 115.71. This would include following the National Protocol for evidence collection in 115.21. TDOC OIC Investigators decide based on the allegation whether to send an inmate to the hospital for a SANE examination. It was documented in investigation case files that TDOC OIC Investigators were making the decision in sexual abuse cases whether to send an inmate to the hospital for a SANE examination.

Recommendation: It is recommended that the facility medical staff are also involved in the decision to send an alleged victim of sexual assault for a forensic examination. If the alleged incident occurred within the 72-hour time frame, it is recommended the TDOC OIC Investigator and WCF medical staff consult with the hospital forensic examination department to determine if a forensic examination is required.

c) CoreCivic policy 13-79 states “Treatment services shall be provided to all victims of sexual abuse while incarcerated without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.” The policy reflects this provision of the standard.

d) CoreCivic policy 14-100 states “The facility shall offer all victims of sexual abuse access to forensic medical exams, where evidentiarily or medically appropriate. The PREA Compliance Manager, Facility Investigator or ADO shall consult with TDOC OIC prior to transporting an inmate for an examination to be performed by a Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE). If it is determined that an 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 qualified medical practitioners.” The policy reflects this provision of the standard.

The facility provided an MOU with a local rape crisis center called Wo/Men's Resource and Rape Assistance Program. In the MOU, WRAP agrees to provide emotional support services through victim advocates to inmate victims as requested at the forensic examination, investigative interviews, provide support and crisis intervention through a crisis hotline.

PCM Interview - The PCM/AW said victim advocate services are provided at the forensic examination at the Jackson General Hospital by WRAP advocates. If a WRAP advocate cannot make it to the hospital, the facility has staff that have been trained to be a victim advocate to provide the service if the inmate requests it.

Victim Advocate Interview - An interview was conducted by phone with a Director at WRAP to verify the MOU with WCF and the services WRAP agreed to provide. She said WRAP would respond to the Jackson General Hospital to provide victim advocate services to an inmate at the forensic examination if requested.

Inmate Interview - An inmate that had reported sexual abuse was said he was offered a victim advocate but did not want one at the forensic examination.

e) CoreCivic policy 14-100 states "As requested by the victim, either a victim advocate from a Rape Crisis Center, or a qualified community-based organization staff member, shall accompany and support the victim through the forensic medical examination process and investigatory interviews. Available victim advocacy services offered by a hospital conducting the exam may be used for this purpose. Efforts to identify and utilize a victim advocate shall be documented on the 14-2C Sexual Abuse Incident Check Sheet via the IRD."

PCM Interview - The PCM/AW said the facility has staff that are trained as staff victim advocates that can provide emotional support services at the investigative interview if the inmate victim makes the request at the time of the interview with investigators.

Inmate Interviews - Twelve inmates that reported sexual abuse at WCF were interviewed. None of the twelve said they had requested a victim advocate be present when being interviewed by investigators. A review of the 14-2C forms in the investigation files showed no inmate victim requested a victim advocate.

f) CoreCivic is contracted by the Tennessee DOC to house inmates for TDOC. The TDOC Office of Investigations and Conduct conducts all criminal investigations of sexual abuse or sexual harassment at Whiteville CF. CoreCivic policy 14-100 states "CoreCivic facilities do not conduct criminal investigations into allegations of sexual abuse, TDOC OIC is responsible for ensuring that the requirements of PREA Standards 115.21 and 115.71 are followed for each criminal investigation."

h) CoreCivic policy 14-100 states "If unable to secure the services of a victim advocate to accompany the alleged victim through 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/designee for appropriateness to serve in this role and must have received documented education concerning sexual assault and forensic examination issues."

	<p>Victim Advocate Staff Interview – A facility Mental Health staff said she had completed the victim advocate training online that qualifies her as a victim advocate. She did not get a certificate or training record documenting the completion. She said she has not been asked to provide the service since being trained.</p> <p>CoreCivic provided an additional victim advocate training to provide documentation of the training completion. The training curriculum was provided for review. The curriculum covered victim responses to sexual abuse, effects of trauma on the victim, victim centered approach to trauma, victim advocate services, and the role of the victim advocate. The training was comprehensive. Staff completing this training would be considered a qualified staff advocate meeting the standard. Training completion records were provided for WCF staff.</p> <p>Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.</p>
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<b>115.22</b>	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a-b) CoreCivic policy 14-100 states “The Warden shall ensure that an administrative investigation is completed for all allegations of sexual abuse and sexual harassment.” “All allegations of sexual abuse or sexual harassment shall be referred for investigation to the Tennessee Department of Corrections Office of Investigations and Conduct (OIC). That agency investigative process will be followed for allegations of sexual abuse.” The CoreCivic policy 14-2 that includes their investigation policy is posted on the CoreCivic website at <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>Agency Head Interview – The Vice President of Core Services said it is CoreCivic Policy to immediately refer all allegations of sexual abuse that are potentially 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. He said CoreCivic never conducts criminal investigations, only administrative ones.</p> <p>Facility Investigator Interview – The Facility Investigator said she conducts all administrative investigations of sexual abuse and sexual harassment. The TDOC OIC Investigators are notified of all reports of sexual abuse and sexual harassment as well. They will conduct a criminal investigation if there is evidence of a criminal violation. She gathers initial information and provides it to TDOC investigators, then waits until the TDOC OIC investigators tell her it is okay for her to complete the administrative investigation. She said this usually occurs within 24 hours after the inmate report.</p>

	<p>CoreCivic policy 14-100 states “An administrative investigation into an allegation with potentially criminal behavior shall not be initiated by a facility investigator until TDOC OIC declines to accept the case or otherwise authorizes the facility to begin an administrative investigation. Administrative Investigations shall not interfere with criminal investigations being conducted by TDOC and shall be coordinated with the investigative entity conducting that investigation.” The policy requires the process described in the Facility Investigator’s interview.</p> <p>Investigation Report Review - The facility reported thirty administrative investigations completed during the review period. Twenty-two investigations were selected for review. Ten allegations of sexual abuse had a criminal investigation by a TDOC OIC investigator. The inmate victim was taken to Jackson General Hospital for a SANE examination in two of the sexual abuse allegations. The criminal investigations could not be reviewed as the TDOC OIC does not provide any documentation of their investigations to the WCF Facility Investigator.</p> <p>c) CoreCivic policy 14-100 Sexual Abuse Prevention states “All allegations of sexual abuse or sexual harassment shall be referred for investigation to the Tennessee Department of Corrections Office of Investigations and Conduct (OIC). That agency investigative process will be followed for allegations of sexual abuse. CoreCivic facilities do not conduct criminal investigations into allegations of sexual abuse, TDOC OIC is responsible for ensuring that the requirements of PREA Standards 115.21 and 115.71 are followed for each criminal investigation.” TDOC policy 107.01 Office of Investigations and Conduct Roles and Responsibilities requires OIC Special Agents to complete an accredited law enforcement academy. Special Agents are commissioned as a full-time law enforcement officers. While at the onsite audit, this auditor had an informal conversation with a TDOC Special Agent that was at the facility. He said that all OIC investigators are required to be law enforcement certified.</p> <p>Based on the information from interviews, policies and documents reviewed, It has been determined the facility meets the provisions of the standard.</p>
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<b>115.31</b>	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<p><b>Auditor Discussion</b></p> <p>a-b) CoreCivic policy 14-100 states “All CoreCivic facility employees shall receive comprehensive training on preventing, detecting and responding to sexual abuse and sexual harassment. Such training shall be tailored to the gender of the residents at the facility. Employees who have transferred or have been reassigned from a facility housing only one gender of resident (i.e. male facility to a female facility or vice versa) shall receive additional training.” The policy requires all staff to complete the training at pre-service and annually. The training is required to cover the ten topics in</p>

this provision of the standard. The policy reflects the requirements of this provision of the standard.

Curriculum Review - The CoreCivic PREA Overview training curriculum was provided for review. The curriculum is used for new staff training and in-service annual training. The training covers the following topics: CoreCivic zero-tolerance policy; rights of inmates/detainees and staff; dynamics of sexual abuse; signs of victimization; how to detect and respond to signs; avoiding inappropriate relationships; complying with mandatory reporting to outside agencies; and included conducting cross gender searches. The training provides information specific to male and female inmates.

Document Review - Training completion documentation was requested for twenty-two staff hired in the last 12 months. Training transcripts were provided as documentation of training completion due to the training being completed with electronic signature. Twenty staff hired in the last year completed the PREA Overview training during pre-service academy prior to working around inmates. Two staff had resigned prior to completing the training.

Staff Interviews - Twelve staff interviewed said the training covered zero tolerance policy; rights of residents and staff; dynamics of sexual abuse; signs and reactions of sexual abuse victims; how to avoid inappropriate relationships with residents; how to respond to a report of sexual abuse; how to protect evidence; and mandatory reporting. Staff demonstrated a thorough knowledge of all topics and could clearly describe their responsibilities in response to a report of sexual abuse or sexual harassment. All staff hired in the last year said they had completed the training prior to working around inmates when they were hired at WCF. All veteran staff said they have completed the training annually.

c-d) CoreCivic policy 14-100 states "Employees shall be required to confirm, either by electronic or manual signature, their understanding of the training that they have received. During Pre-Service Training and Annual In-Service Training, each employee and contractor shall be required to sign either a 14-2A PREA Training Acknowledgment form or electronic verification of completion of the on-line e-learning PREA training module. Documentation will either be maintained in the employee's training file or electronic training records system." A screenshot of the electronic signature page of the training was provided. The acknowledgement is an agreement that staff have received and understand the training they have received.

Training completion documentation was requested for twenty-three veteran staff selected from the staff roster. Training transcripts documented training completion annually for each of the last three years for all twenty-three staff. This exceeds the standard requirement of completing training every two years. Refresher information is provided for staff in posters and

Based on the information from interviews, policies and documents reviewed, this auditor has determined the facility exceeds this standard.

<b>115.32</b>	<b>Volunteer and contractor training</b>
	<p data-bbox="256 188 959 221"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 544 297"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1453 539">a) CoreCivic policy 14-100 states “All volunteers and contractors who have contact with inmates shall receive training on their responsibilities pertaining to sexual abuse and sexual harassment prevention, detection, reporting, and response as outlined in this policy.” The policy reflects the requirements for this provision of the standard.</p> <p data-bbox="256 577 1422 734">b) CoreCivic policy 14-100 states “Contractors, including but not limited to, medical, mental health, education and foodservice shall receive the same PREA training required of all CoreCivic employees who have contact with inmates.” The policy reflects the requirements for this provision of the standard.</p> <p data-bbox="256 772 1437 1019">c) CoreCivic policy 14-100 states “The signed documentation confirming that each Volunteer or Contractor understands the training that he/she has received will be kept in the volunteer or contractor's file by either the Learning Development Manager, facility Volunteer Coordinator or other staff designated by the Warden/ Facility Administrator or PREA Compliance Manager.” The policy reflects the requirements for this provision of the standard.</p> <p data-bbox="256 1057 1453 1339">Volunteer Document Review – Training records were reviewed for six volunteers randomly selected from the volunteer list. All six had completed the volunteer PREA training that included information on the zero-tolerance policy, definitions of sexual abuse and sexual harassment, a volunteers’ responsibilities if an inmate reports an incident of sexual abuse or sexual harassment to them, and steps to protect evidence. The TDOC Employee PREA Training Acknowledgement form is signed indicating they received and understood the training.</p> <p data-bbox="256 1377 1469 1624">Contractor Document Review – Training records for four randomly selected contract staff were reviewed. Two had completed the PREA training in the last year when they started working at WCF. Two completed the training annually since they started at WCF. The standard only requires completion of the training one time when the contract staff start work at the facility. Annual completion of training for contract staff exceeds the requirement of the standard.</p> <p data-bbox="256 1662 1477 1989">Volunteer Interview – A religious services volunteer said he completed the PREA training prior to having contact with residents when he started volunteering five years ago and annually since then. He said the training provided the definitions for sexual abuse and sexual harassment, the zero-tolerance policy for CoreCivic, and what his responsibilities are if he becomes aware of an incident of sexual abuse or sexual harassment from direct report by an inmate or suspicion such has occurred. He would immediately contact a security monitor and keep the inmate safe with him until security staff arrive at his location.</p> <p data-bbox="256 2027 1430 2060">Contract Staff Interview – A food service contract staff said he completed the PREA</p>

	<p>training prior to working around inmates when he started working at WCF. He said the training included zero tolerance policy, rights of inmates and staff, how to protect evidence on the victim, and how to respond to a report. He said he is required to keep the inmate safe and with him, contact the shift supervisor immediately, and ensure the inmate doesn't do anything to destroy possible evidence until security staff arrive.</p> <p>Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of this standard.</p>
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<b>115.33</b>	<b>Inmate education</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>a) CoreCivic policy 14-100 states "Upon arrival at the facility for intake, each inmate shall be provided with written information explaining the zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment (e.g., inmate handbook, CoreCivic 14-2AA Preventing Sexual Abuse brochure, handout etc.)."</p> <p>Inmate Interviews - Forty inmates were interviewed. Thirty-seven recalled receiving a brochure and inmate handbook about PREA reporting on the first day of arrival at the facility. Three said they did not receive any information; however documentation shows they signed for the handbook and PREA brochure. All said they see posters about PREA reporting everywhere in the facility.</p> <p>Intake Staff Interview - A Case Manager that provides the initial PREA information to inmates at intake said the PREA brochure and inmate handbook are provided to the inmates at arrival. She said inmates are provided with the PREA video from the PREA Resource Center, Inmate Handbook that has detailed information about how to report at WCF and PREA information pamphlet. Spanish versions of the pamphlet and handbook are also available. If an inmate is Limited English Proficient, she said Case Managers will utilize the Voyce Line to access an interpreter to assist with providing the information. She said the comprehensive PREA education is provided by the Case Manager when the inmate moves to their assigned unit.</p> <p>Observations - New inmates arrived on the third day of the onsite audit. The PREA orientation was viewed. The PREA video from the PRC was playing on a large television on wall. Most inmates were not watching it. When the video finished playing, the Case Manager gained their attention and showed the inmates the PREA brochure. She asked if they all knew what PREA was. She then provided a brief verbal explanation of what was in the brochure and informed them there is additional PREA reporting information in the handbook. She then asked them to sign the forms for receipt of the brochure and handbook. This is only initial information and not the comprehensive education. The comprehensive education could not be observed</p>

during the onsite audit.

During the tour, PREA reporting information posters were seen in every housing unit wing, dining facility, recreation building, commissary line area, medical waiting area, hallways and education building. The posters were in Spanish as well as English. The information is also posted on the new inmate tablets.

b) CoreCivic policy 14-100 states “Within 30 days following intake, either in person or through video, inmates shall receive comprehensive education information.” Topics to be covered are the zero-tolerance policy, how to report sexual abuse and sexual harassment, rights of inmates to be free from sexual abuse and sexual harassment, and available emotional support services.

Comprehensive Education Staff Interview - A Case Manager from a general population unit said she provides the comprehensive PREA education to inmates that arrive from the Orientation housing unit. She provides explains the information in the PREA brochure and Inmate Handbook PREA section with each inmate individually when she meets with them to complete their 30-day risk assessment screening. By meeting with them individually, she can determine if they need accommodations for cognitive disabilities, hearing impairment, visual impairment or limited English proficiency. She said there is an interpretive service through Voyce that staff can use for a LEP inmate.

d) CoreCivic policy 14-100 states “The facility shall provide inmate education in formats accessible to all inmates, including those who are deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. Appropriate steps shall be taken 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 sexual abuse and sexual harassment.” A Spanish version of the PREA brochure and Inmate Handbook was provided. Spanish PREA posters were posted alongside English posters throughout the facility.

The facility provided a current contract with Voyce Services to provide language interpretive services in several languages. The contract included American Sign Language through virtual video meeting. A memorandum from the Assistant Wardens to all staff with subject Limited English Proficiency Plan was provided for review. The memorandum instructs the orientation counselor to identify LEP inmates through the intake process and provide assistance with the language service.

e) CoreCivic policy 14-100 states “Inmates shall sign indicating acknowledgment that they have received PREA education materials using the CoreCivic 14-2G PREA Education Acknowledgment form. This form shall be signed both at intake and following the receipt of 30- day comprehensive education. This documentation shall be maintained by the facility in the inmate file.”

Document Review - Forty inmates were selected at random for PREA education completion records review. Documentation was provided for all forty indicating they received PREA information at arrival to the facility and again at a “30-day”

	<p>comprehensive orientation.</p> <p>Based on the policies reviewed, documents reviewed and interviews, the facility meets all of the provisions of this standard.</p>
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<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a) CoreCivic policy 14-100 states “In addition to the general training provided to all employees, and to the extent that CoreCivic conducts sexual abuse investigations, investigators shall receive specialized training in conducting sexual abuse investigations in confinement settings.” The policy reflects this provision of the standard.</p> <p>Investigator Interview - The designated Facility Investigator was interviewed and said she has completed the NIC Investigating Sexual Abuse in a Confinement Setting in addition to the annual PREA training. She said she is a former police officer and is law enforcement certified by the State of Tennessee.</p> <p>b) CoreCivic policy 14-100 states “Specialized training for investigators shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.” The policy reflects this provision of the standard.</p> <p>Document Review -The NIC Investigating Sexual Abuse in a Confinement Setting curriculum was reviewed and found to cover interview techniques, Miranda and Garrity warnings, evidence collection, and criteria and evidence required to substantiate an administrative case or a criminal case.</p> <p>c) CoreCivic policy 14-100 states “Employees who conduct sexual abuse and sexual harassment administrative investigations are required to document completion of this training by signing the 14-100A1 PREA Training Acknowledgment Specialized Training or electronic verification of completion of on-line training. This documentation shall be maintained in the employee training file or electronic training records system.” The policy reflects this provision of the standard.</p> <p>Document Review - A training record indicating completion of the NIC Investigating Sexual Abuse in a Confinement Setting training was provided for the Facility Investigator in 2020 and 2023. Documentation was also provided for annual PREA training completion.</p> <p>Based on the interviews, policy and documents reviewed, the facility meets all provisions of this standard.</p>

<b>115.35</b>	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 264 544 297"><b>Auditor Discussion</b></p> <p data-bbox="256 338 1469 584">a, d) CoreCivic policy 14-100 states “In addition to the general training provided to all employees to comply with PREA Standard 115.31, all full and part-time Qualified Health Care Professionals and Qualified Mental Health Professionals, shall receive specialized medical training.” The policy requires medical and mental health staff to complete specialized medical training that covers the four topics required by this standard.</p> <p data-bbox="256 622 1477 696">The course curriculum provided for review is the NIC PREA 101 for Medical and Mental Health Practitioners that covers the four required topics in the standard.</p> <p data-bbox="256 734 1477 1021">Medical Staff Interview - The Health Services Administrator said she has completed the NIC PREA specialized medical training annually since she has worked at WCF. She said the training covered how to detect signs of sexual abuse and sexual harassment, what medical staff can do to preserve evidence, how to respond to victims of sexual abuse, and what she must do if an inmate reports an incident of sexual abuse or sexual harassment to her. She said all medical staff are required to complete the training annually.</p> <p data-bbox="256 1059 1398 1133">b) CoreCivic policy 14-100 states that medical staff do not conduct forensic examinations.</p> <p data-bbox="256 1171 1461 1373">c) CoreCivic policy 14-100 states “Medical and Mental Health Staff are required to document completion of specialized training by signing the 14-2A1 PREA Training Acknowledgment for Specialty Training, or electronic verification of completion of on-line training. This documentation shall be maintained in the employee training file or electronic training records system.”</p> <p data-bbox="256 1411 1469 1612">Specialized medical and PREA training documents were requested for twelve medical staff, one contractor and eleven CoreCivic medical staff. Eleven completed the NIC specialized medical training module and the PREA overview training that all staff must complete annually. One new medical staff resigned a week after being hired and prior to completing the required training.</p> <p data-bbox="256 1650 1374 1724">Based on the interviews, policy and documents reviewed, the facility meets all provisions of this standard.</p>

<b>115.41</b>	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

a-b) CoreCivic policy 14-100 states “All inmates shall be screened, using the TDOC PREA Screening Application upon arrival at a facility, for their risk of being sexually abused by other inmates or sexually abusive toward other inmates. This screening shall take place within 72 hours of arrival at the facility.”

Screening Staff Interview - The Case Manager that completes the initial risk screening of inmates at arrival to the facility said the screening is completed on the first day the offenders arrive or the next morning if they arrive late in the day. She meets with inmates in an office where other inmates cannot hear and asks the inmates questions from the risk assessment screening form.

Tour Observation - Inmates that are new arrivals to WCF are held in an intake area that has two large holding cells and an area with a TV on the wall. The PREA video is shown on the TV while the inmates are waiting to be seen by the Case Manager. The case Manager’s office was inside a secured area with other staff offices separate from the holding area providing a confidential meeting with inmates.

Document Review - Initial risk assessment screenings were reviewed for forty inmates that arrived during the review period. All were completed within the required 72-hour time frame.

c-d) CoreCivic policy 14-100 requires the PREA Screening System Application to be used to determine if an inmate is at risk of victimization and provides the criteria for assessing inmates for risk of sexual victimization. The assessment considers disabilities, age, physical build, prior incarceration, violence in priors, prior sex offense convictions, prior victim of sexual abuse, perception of vulnerability, and civil immigration detainee. The policy reflects the requirements of this provision of the standard.

Screening Staff Interview - The Case Manager that conducts initial risk screenings was interviewed. She was asked what factors the risk screening considers for risk of victimization. The factors she described covered all ten required by the standard and the policy. Some of the information is gathered or verified from review of the inmate records and some is gathered from inmate responses to questions in an interview.

The risk assessment instrument was reviewed. The victim factors included: former victim of institutional sexual abuse, perception of vulnerability, detained for civil immigration only, disabilities, age, build, prior incarceration, exclusive non-violent criminal history, prior convictions for sex offenses against a child or adult, and prior sexual victimization.

Inmate Interviews - Inmates interviewed could recall staff asking some questions about prior victimization, feeling vulnerable to sexual abuse, if they had disabilities, prior convictions involving violence or sex offenses, and prior violent or sexual abuse conduct.

e) CoreCivic policy 14-100 requires the PREA Screening System Application to be used to determine an inmate’s risk of abusiveness based on prior acts of sexual abuse, prior acts of violent offenses, and history of prior institutional violence or

sexual abuse. The policy reflects the requirements of this provision of the standard.

Screening Staff Interview - The Case Manager said answers from the inmate interview and the inmate record are used to assess for prior acts of sexual abuse, prior convictions for violent offenses and a history of prior institutional violence or sexual abuse. She reviews the criminal history and institutional conduct record in addition to asking the inmate questions about prior criminal history and conduct.

Document Review -The screening instrument included four factors in the predatory history/risk section. Those were prior acts of sexual abuse, prior acts of violence, history of discipline for violence, prior history of institutional sexual abuse.

f) CoreCivic policy 14-100 states "Within 30 days, the inmate will be rescreened with the PREA Screening System Application. The inmate shall be reassessed for risk of victimization or abusiveness, to include any additional relevant information received by the facility since the intake screening." The policy meets this provision of the standard.

Screening Staff Interview - A Case Manager that completes the 30-day risk screening re-assessment said they interview the inmate again to ask the same questions that are used for the intake screening. The inmates' answers and the inmate record are used to complete the risk screening re-assessment prior to 30 days. She said the re-assessment is usually completed around 20 to 25 days after arrival at the facility.

Inmate Interview - Forty inmates were interviewed and asked if staff asked them questions about prior victimization, disabilities, or if they felt vulnerable to sexual abuse at this facility a second time around 30 days after arrival. Twenty-six inmates could recall being asked questions a second time. Fourteen said they did not recall being asked a second time. All of the inmates interviewed had a documented re-assessment.

Document Review - Forty risk screening re-assessments were reviewed for inmates that arrived in the last 12 months. The review found all forty inmates had a documented re-assessment completed within 30 days of the inmate's arrival.

g) CoreCivic policy 14-100 states "An inmate's risk level shall be rescreened when warranted due to a referral, request, incident of sexual abuse or sexual victimization, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness." The policy meets this provision of the standard.

Screening Staff Interview - The Case Manager that completes the 30-day screenings said she also completes re-assessments for the inmate victim and inmate perpetrator for sexual abuse incidents, unless they are unfounded. She would also do a re-assessment if new information is received that impacts the assessment.

New assessments were completed for inmates involved in all sexual abuse investigation files reviewed.

h) CoreCivic policy 14-100 states "Inmates refusing to answer particular questions or who fail to disclose complete information shall not be disciplined."

	<p>Risk Screening Staff Interview – Both Case Managers said they cannot discipline an inmate for refusing to answer questions for the risk assessment.</p> <p>i) CoreCivic policy 14-100 states “The facility shall control the dissemination within the facility of responses to questions on the screening forms in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates.”</p> <p>PREA Coordinator Interview – The PREA Coordinator said the information on the risk assessments are confidential and limited to staff that complete them or who are authorized access. The assessments are in an electronic system that is password protected.</p> <p>PCM Interview – The PCM said the risk assessment is in an electronic system with limited access. Only staff that complete the assessment or review assessments have authorized access.</p> <p>Screening Staff Interview – Both Case Managers that complete risk assessments said the information that is contained on a risk assessment is confidential and only authorized staff have access.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility meets the provisions of the standard.</p>
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<b>115.42</b>	<b>Use of screening information</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>a) CoreCivic policy 14-100 states “The facility shall use the assessment obtained through use of from the TDOC PREA Screening Application at initial intake and at all subsequent reassessments, in the consideration of housing, recreation, work, program, and other activities.” The policy reflects the requirements of this provision of the standard.</p> <p>PCM Interview – The PCM said the risk assessment results are utilized as a factor in inmate housing assignments. Alerts are generated for inmates at risk of being a victim or an abuser. An inmate that is at risk of being a victim cannot be housed with an inmate that is a risk to be an abuser/perpetrator. She reviews the housing rosters for proper assignments based on the alerts.</p> <p>Risk Screening Staff Interview – The staff that complete the risk assessments said the results can be either a risk for victimization, risk for abuser/perpetrator or no risk. The results create alerts in the inmate information system. The risk assessment alerts are reviewed when making housing assignments.</p> <p>Document review – a copy of the housing roster with alerts was provided for review.</p>

	<p>The roster had designations for inmates at risk for victimization and at risk for perpetration or no risk.</p> <p>b) CoreCivic policy 14-100 states “The facility shall make individualized case by case determinations about how to ensure the safety of each inmate.” The policy reflects this provision of the standard.</p> <p>Risk Screening Staff Interview – The staff that complete the risk assessments said the results can be either a risk for victimization, risk for abuser/perpetrator or no risk. The results create alerts in the inmate information system. The risk assessment alerts are reviewed when making housing assignments.</p> <p>The facility meets the provisions of the standard based on the information from interviews, policies and document reviews.</p>
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<b>115.43</b>	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>a) CoreCivic policy 14-100 states “Inmates at high risk for sexual victimization shall not be placed in involuntary restrictive 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. The CR-3241 Protective Services Investigation Routing form must clearly indicate the basis of concern for the inmate’s safety and the reason no alternative means of separation can be arranged. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary restrictive housing for less than 24 hours while completing the assessment.”</p> <p>Warden Interview – The Warden said if it is determined an inmate is a high risk for sexual abuse, the Unit Manager will look for alternative housing placement that is safe. Use of restrictive housing is a last resort. If an inmate is only safe in restrictive housing, a transfer to PC in a nearby facility will be considered.</p> <p>b) CoreCivic policy 14-100 states “Inmates placed in restrictive housing pursuant to section 9.a above shall have access to programs, privileges, education, and work opportunities to the extent possible. If access to programs, privileges, education, or work opportunities is restricted, the facility shall document the following: i. the opportunities that have been limited; ii. the duration of the limitation; and iii. the reasons for such limitations. iv. If inmate access to programs, privileges, education, or work opportunities is restricted, the facility shall document this using Contact Notes LCDG in OMS.”</p> <p>c) CoreCivic policy 14-100 states “Involuntary restrictive housing shall be used only until an alternative means of separation from likely abusers can be arranged,</p>

and such an assignment shall not ordinarily exceed a period of 30 days.”

The facility reported on the PAQ that no inmates were involuntarily held in restrictive housing due to high risk for victimization from the assessment during the review period.

Warden Interview – The Warden said an inmate has not been involuntarily placed in restrictive housing based on a high risk of victimization assessment in the last year. Staff will look at all alternatives in housing prior to placing an inmate involuntarily in restrictive housing.

Staff that Supervise Segregated Housing – The Chief of Security was interviewed as the staff that supervises the RHU. She said that inmates involuntarily placed in restrictive housing due to high risk for sexual victimization would still have some access to education or other program materials through workbooks or tablets.

Restrictions to privileges and programs would be documented. A review of placement in restrictive housing is conducted within 24 hours, 7 days and then every 30 days. The goal is to get them removed from RHU as soon as it is safe to do so.

The facility said there were no inmates that were involuntarily placed in segregation due to being identified as high risk for sexual victimization. Nine inmates housed in segregation were interviewed. None of them said they were placed in segregation involuntarily for being a high risk of sexual victimization.

Based on the interviews and policies reviewed, the facility meets all provisions of this standard.

115.51	Inmate reporting
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a) CoreCivic policy 14-100 states “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 or employees for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.” The policy listed seven methods of reporting to be provided to inmates. These include verbal report to any staff, writing medical or mental health, calling the posted internal PREA reporting number, writing the Warden in a sealed envelope, telling someone outside that can contact the facility, contacting the PREA Compliance Manager, reporting on the tablet.</p> <p>Random Staff Interview – All staff said that an inmate could make a verbal report to staff in private, call on the phone to the number posted in the housing units, write a report and put it in the mailbox. Anonymous reports can be written without a name on it and dropped in the mailbox in the housing units. Staff are required to accept all</p>

written, verbal, anonymous, or third-party reports.

Inmate Interviews – Most inmates said they could make a report of retaliation, sexual abuse and sexual harassment through the offender phone system or the tablet by calling the posted numbers, write to their case manager, tell their family to report for them, or just tell any staff. Every inmate interviewed knew several methods of reporting even though most said they didn't pay attention when they were told how to report because they didn't think they needed the information.

Tour Observations – During the tour of the facility, PREA reporting information posters were seen in every housing unit wing, dining facility, recreation building, commissary line area, medical waiting area, visiting room, hallways between housing units, and education building. The information for calling the internal PREA line was painted on the wall next to the inmate phones however the number did not coincide with the message on the phone. A test call was made by this auditor to the internal PREA hotline from an inmate phone in a housing unit. A prompt told the caller to dial \*8 for a PREA report. This number was not the same as the number on the wall. A message was left on a voicemail. No pin number or inmate identification number was necessary to make the call. Staff on the tour of the facility verified the message was received within minutes after making the report.

Corrective Action Required: Staff were informed the number for the internal PREA report line had changed on the inmate phone system and the information would have to be updated on posters, walls, and the inmate handbook where it appears. The revised handbook, photos of revised posters and information on the wall by the phones would need to be provided to document the correction.

**Corrective Action Completed:** The internal PREA report line was updated on posters and in the handbook which were provided. Photos of the information on the wall by the inmate phones was provided to verify the change.

b) CoreCivic policy 14-100 states “Each facility shall provide at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of CoreCivic or the contracting agency and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to facility officials, allowing the inmate to remain anonymous upon request.” “Inmates detained solely for civil immigration purposes shall be provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security.”

PCM Interview – The PCM said inmates can report to the Whiteville Police Department as the agency outside of CoreCivic. The inmates can mail a written report to Whiteville PD. If they want to remain anonymous they can leave their name off of the report and envelope.

An MOU with the Whiteville PD was provided that is current. In the MOU the Whiteville PD agrees to receive reports of sexual abuse and sexual harassment via mail from inmates at Whiteville CF and immediately provide the information to the facility. The inmates can remain anonymous by leaving their name off the letter and

return address on the envelope.

Inmate Interviews – Most inmates knew there was someone they could report to outside of the facility. If they wanted to remain anonymous they would just leave their name off of the report. They were not aware it was the Whiteville PD.

Document Review – The WCF Inmate Handbook informed inmates to write the Whiteville PD for anonymous reports. It did not say that Whiteville PD is an way to report to an agency outside of CoreCivic and the TDOC. To make it clear who the agency is for external reports, the Inmate Handbook must be revised by adding information about Whiteville PD being external to the facility.

Correction Completed – A revised WCF Inmate Handbook was provided that clearly indicated the Whiteville PD was the external report agency and that inmates could report anonymously.

c) CoreCivic policy 14-100 states “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.”

Random Staff Interview – Staff said the inmates could report to them verbally, in writing, anonymously in writing or have family make a report. Staff said they are required to do an incident report for all reports of sexual abuse or sexual harassment to include verbal reports. The report must be turned in before the end of their shift on the same day.

Inmate Interviews – Most inmates said they could make a report of retaliation, sexual abuse and sexual harassment through the offender phone system or the tablet, write to their case manager, tell their family to report for them, or just tell any staff. Every inmate interviewed knew several methods of reporting.

d) CoreCivic policy 14-100 states “CoreCivic employees, contractors, volunteers and interested third parties may report allegations of sexual abuse and sexual harassment (including anonymous reports) to the CoreCivic 24-hour Ethics line.”

Random Staff Interviews – When asked how staff can make a private report, all staff said they could use the Ethics Line. They could also ask to talk to their supervisor in private to make the report. Another private way to report was to email the PCM, investigator or shift supervisor.

Based on the interviews, tour observations, policy and documents reviewed, the facility meets all provisions of this standard.

<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard

	<p><b>Auditor Discussion</b></p> <p>CoreCivic policy 14-100 states “CoreCivic facilities do not maintain administrative procedures to address inmate grievances regarding sexual abuse unless specifically mandated by contract. Allegations of sexual abuse and/or sexual harassment are not processed through the facility inmate grievance process.” “Should a report of sexual abuse or sexual harassment be submitted and received as an inmate grievance, it will immediately be referred to the facility Investigator, Administrative Duty Officer and/or PREA Compliance Manager for investigation and reporting in accordance with this policy.”</p> <p>The policy states that Whiteville CF is exempt from the standard, but the inmate population was not notified of the exemption through a notice posting. The facility was asked to add a notice that covers the requirements of the FAQ for this standard from July 19, 2022, to be exempt from the standard. A notice was added to the inmate handbook in the section for Sexual Abuse and Harassment of Inmates that states “NOTICE - grievances related to sexual abuse or allegations of sexual abuse (i.e., allegations of sexual abuse, a fear of sexual abuse, or allegations of mishandling of an incident of sexual abuse) are immediately converted to investigations that are outside of the agency’s administrative remedies process and are not considered by the agency to be grievances.” This informs the inmates that a grievance regarding sexual abuse will automatically be referred for investigation.</p> <p>A revised Inmate Handbook was provided post onsite audit with the required notice regarding sexual abuse grievances. This follows the FAQ requirement for the exemption.</p> <p>Based on the information from the policy and inmate handbook revision, this auditor finds Whiteville CF is exempt from this standard.</p>
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<b>115.53</b>	<p><b>Inmate access to outside confidential support services</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>a) CoreCivic policy 14-100 states “Inmates shall have access to outside victim advocates for emotional support services related to sexual abuse by being provided with mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, state, or national victim advocacy or rape crisis organizations. Mailing addresses and phone numbers shall be posted in all housing units and shall be included in written inmate education material.” The policy requires communication between the inmate and the victim advocate organization to be as confidential as possible. The correspondence is required to be processed as legal mail that cannot be read or censored.</p> <p>Inmate Interviews - Inmates were asked during interviews if they were aware of an</p>
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outside organization that can provide services to victims of sexual abuse. Most knew there was something said or information on a poster about an organization for victims they could contact but didn't recall the name of the organization. Inmates that had reported an incident of sexual abuse while at the facility said they were offered access to a victim advocate.

Tour Observations – CoreCivic PREA posters were observed in all housing units, hallways, admin areas, visiting room, dining room, recreation/program areas that had information for a victim advocate organization at the bottom in both English and Spanish. The mailing address and hotline number were provided for Wo/Men's Resource and Rape Assistance Program (WRAP) on some posters observed during the tour. A hotline number cannot be called from the inmate phone system unless the individual inmate adds the phone number to their approved phone list. Information to call WRAP was painted on the wall by the inmate phones in the housing units.

Inmates were instructed to dial \*210 to contact WRAP. The facility provided pictures of PREA posters with \*210 as the way to contact WRAP. It is recommended all PREA posters are checked for the \*210 information and revised accordingly.

Document Review – the Inmate Handbook was provided that was revised in August of 2025. It provides information to inmate victims for calling WRAP for emotional supports services by dialing \*8 on the inmate phone system. This speed dial was called as a test and went to voicemail for reporting PREA reports. It was not calling WRAP. The facility provided another revision of the Inmate Handbook after the onsite audit that tells inmate victims to call \*210 for contacting WRAP. The PCM was asked for clarification and if \*210 was active on the system for contacting WRAP. She said \*210 was active and has been the way for inmates to contact WRAP prior to the onsite audit. She said some posters had incorrect information and were updated.

b) CoreCivic policy 14-100 states "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) CoreCivic policy 14-100 states "CoreCivic shall maintain, or attempt to enter into, Memorandums of Understanding (MOU) or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse."

Document Review – Whiteville CF has a memorandum of understanding with Wo/Men's Resource and Rape Assistance Program to provide inmate victims of sexual abuse victim advocate services through a hotline at the facility or by mail. The MOU also allows for special visits by victim advocates with inmates at the facility with approval. This MOU was signed in 2020 for a period of three years. A request was made for the current MOU. A copy of the MOU was provided with an effective date of February 2, 2024 for three years.

Victim Advocate Interview - An interview was conducted by phone with a Director at WRAP to verify the MOU with WCF and the services WRAP agreed to provide. She said WRAP would respond to the Jackson General Hospital to provide victim advocate

	<p>services to an inmate at the forensic examination if requested. WRAP advocates were available to inmates on their hotline for emotional support services. She said an advocate could come to the facility for a special visit with a victim or support for investigative interviews.</p> <p>The facility meets the provisions of this standard based on the information from interviews, documents and policies reviewed.</p>
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115.54	Third-party reporting
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>CoreCivic policy 14-100 states “CoreCivic employees, contractors, volunteers and interested third parties may report allegations of sexual abuse and sexual harassment (including anonymous reports) to the CoreCivic 24-hour Ethics line at 1-866-757-4448 or through <a href="http://www.CoreCivic.ethicspoint.com">www.CoreCivic.ethicspoint.com</a>.”</p> <p>Signs were observed throughout the facility with third party reporting information. A test report was conducted on the inmate phone system during the tour. The facility staff on the tour could show this auditor that the report was received via email from the voicemail system. Several mailboxes were observed in every housing unit entrance. There was a mailbox for general mail, grievance, medical or commissary that an inmate could drop a written report in without other inmates knowing it was a PREA report.</p> <p>Staff Interviews - During random staff interviews, all staff knew of a phone number they could make a third-party report of sexual abuse or sexual harassment on behalf of an inmate. All staff said the inmates can report for other inmates by calling the PREA hotline or writing staff.</p> <p>Inmate Interviews - During inmate interviews, most inmates said their family could call a phone number to make a report of sexual abuse or sexual harassment on their behalf. All inmates knew they could report for another inmate.</p> <p>Third party reporting methods are listed on the Whiteville Correctional Facility CoreCivic webpage at <a href="https://www.corecivic.com/facilities/whiteville-correctional-facility">https://www.corecivic.com/facilities/whiteville-correctional-facility</a>. This includes a number to the Warden’s office, the CoreCivic Ethics hotline and the TDOC PREA Tip Line. The mailing address was also provided for Warden’s office, Whiteville Police Department and the Tennessee Department of Corrections. The Ethics Line information is also posted on the CoreCivic PREA webpage at <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> under Reporting Allegations of Sexual Abuse/Sexual Harassment.</p> <p>A test report was made on the Ethics Line phone number and through the webpage written reporting system. Both were a long process requiring the person reporting to</p>

	<p>complete several steps and create passwords as well as security questions. A person answered the Ethics Line phone call and walked me through the process. The staff was familiar with PREA reports and knew how to guide a person through the process, allowing them to remain anonymous if they wished. A test call was made to the TDOC PREA Tips Line where the caller is asked to leave a message. A test message was left for Whiteville Correctional Facility. The message was forwarded by the TDOC to the WCF Facility Investigator, PREA Compliance Manager and the PREA Coordinator for CoreCivic within an hour. A test report was also made to the WCF Warden’s office by leaving a voicemail message at the number listed on the facility website. The Facility Investigator notified this auditor of receiving the voicemail message within forty minutes.</p> <p>Based on the information obtained from interviews, policies, test reports and observations on the tour, it has been determined the facility meets this standard.</p>
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<b>115.61</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a) CoreCivic policy 14-100 states “In accordance with this policy, all staff, including employees, contractors, and volunteers are required to report immediately any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment, retaliation by other inmates or staff for reporting sexual abuse, and staff neglect or violation of responsibilities that may have contributed to such incidents.” The policy reflects the requirements of this provision of the standard.</p> <p>Random Staff Interviews - Staff were asked to describe their responsibilities and the protocols they must follow if an inmate were to make a report of sexual assault/abuse to them. All staff said they would separate the victim from other inmates, keep the victim with them for safety, talk to the victim in private and immediately report that information to the shift supervisor. The steps for staff to follow were printed on a card the size of their identification card that all staff carried. All staff said they were required to immediately report any retaliation against an inmate victim or staff. They are also required to report staff failure to report knowledge of an incident of sexual abuse, sexual harassment or retaliation they were aware of.</p> <p>b) CoreCivic policy 14-100 states “Apart from reporting to designated supervisors or officials, employees/contractors 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.” The policy reflects the requirements of this provision of the standard.</p> <p>Random Staff Interviews - All staff said the information they are told form an inmate report of sexual abuse or sexual harassment is confidential and can only be shared</p>

with staff that are directly involved in the response or the investigation of the incident.

c) CoreCivic policy 14-100 states “Unless otherwise precluded by federal, state, or local law, medical and mental health professionals shall be required to follow reporting procedures as outlined in this policy. At the initiation of providing medical care, both medical and mental health professionals will inform inmates of their professional duty to report and the limitations of confidentiality.” The policy reflects the requirements of this provision of the standard.

Medical Staff Interview - The Health Services Administrator was interviewed. She said the medical staff are required to report to the facility investigator any sexual abuse incident report from an inmate that happened in a correctional institution.

Mental Health Staff Interview - The mental health staff interviewed stated she informs inmates at the beginning of services that she has a duty to report any incident of sexual abuse and sexual harassment that occurred in a corrections facility to the facility investigator. She has not had to report anything in the last year.

d) CoreCivic policy 14-100 states “For alleged victims under the age of 18, or victims who are considered a vulnerable adult under a state or local vulnerable persons statute, the facility shall notify TDOC for further notification to any state or local services agency under applicable mandatory reporting laws.” The policy reflects the requirements of this provision of the standard.

Warden Interview - The warden said if there was an incident of sexual abuse reported involving an inmate that was considered a vulnerable adult, he would have the PCM contact the Tennessee Adult Protective Services as required.

PCM Interview - If an inmate that would meet the definition of a vulnerable adult reported an incident of sexual abuse, the PCM said the facility would contact the Tennessee Adult Protective Services as required.

e) Warden Interview - The Warden said all reports of sexual abuse and sexual harassment, including third-party and anonymous reports, are immediately forwarded to the Facility Investigator and the TDOC OIC Investigator for investigation.

Investigation Review - Twenty-two investigations were reviewed. In all twenty-two, the information from an inmate report of sexual abuse or sexual harassment was forwarded to the Facility Investigator and to the TDOC OIC Investigator immediately after it was received.

The facility meets the provisions of the standard based on interviews, tour observations, policies and documents reviewed.

<b>115.62</b>	<b>Agency protection duties</b>
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	<b>Auditor Overall Determination:</b> Meets Standard
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	<p><b>Auditor Discussion</b></p> <p>CoreCivic policy 14-100 states “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>Agency Head Interview - The Vice President said staff will take immediate action to protect the inmate from the area and/or individuals from the reported danger/risk.</p> <p>Warden Interview - The Warden said staff would take immediate action to separate the victim and perpetrator/subject if there was an imminent risk of sexual abuse. The inmate perpetrator could be placed in segregation. Staff would be placed on a no inmate contact post or suspended temporarily if needed.</p> <p>Random Staff Interviews - All staff interviewed said if an inmate were in imminent risk of sexual abuse, they would take immediate action to protect the inmate by separating them from other inmates and keeping the inmate with them while they notify the shift supervisor.</p> <p>The facility reported on the PAQ no instances of imminent risk of sexual abuse requiring immediate action during the review period.</p> <p>Based on the information from interviews and policies reviewed, the facility meets the standard.</p>
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<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>a-c) If an inmate at Whiteville Correctional Facility reports an incident of sexual abuse that occurred at another facility, CoreCivic policy 14-100 requires the Warden to provide the information reported by the inmate to the facility head of the facility where the incident was alleged to have occurred within 72 hours. The policy requires the Warden to document that WCF has provided the information through the 5-1B Notice to Administration.</p> <p>CoreCivic policy 14-100 states “The Warden of the facility that received the allegation shall notify the Warden/Facility Administrator or appropriate headquarters office of the facility or agency where the alleged abuse took place as soon as possible, but no later than 72 hours after receiving the allegation.”</p> <p>The facility reported on the pre-audit questionnaire there were no reports of sexual abuse from an inmate at WCF for an incident that occurred at another facility during the last year.</p> <p>Warden Interview - The Warden said he would forward reports of sexual abuse that</p>

	<p>occurred at another facility to the facility head of that facility within 72 hours using a 5-1B form. He would call the facility with the information first and then email the information to document it was provided. The Warden said there have been no reports received of sexual abuse that occurred at another facility in the last year.</p> <p>PCM Interview - If an inmate at WCF reports an incident of sexual abuse that occurred at another facility, the Facility investigator will get the report from the alleged victim and send it to the Warden to be forwarded to the facility where the incident took place.</p> <p>d) CoreCivic policy 14-100 states “Upon receiving notification from another facility that an incident/allegation of sexual abuse had occurred while the inmate was previously confined at the facility, the following actions shall be taken.” The policy requires the facility to review the information, determine whether it was investigated and if not, begin investigation procedures.</p> <p>PCM Interview – The PCM said if the facility receives a report of sexual abuse that occurred at WCF from an inmate at another facility, it will be assigned for investigation, and the facility will coordinate additional inmate interviews with the holding facility.</p> <p>Warden Interview – During his interview, the Warden said if an inmate at reports an incident of sexual abuse that occurred at another facility, he would forward information to the facility head of the other facility. This would be done within 72 hours and documented. The Warden said if he receives a report of an incident of sexual abuse that occurred at from an inmate at another facility, he would provide the information to the Facility Investigator to conduct an investigation.</p> <p>Investigation Review – One investigation of staff sexual abuse was conducted based on an allegation received from a former WCF inmate housed at another facility. The TDOC OIC Investigator received the information and immediately provided it to the WCF Facility Investigator. WCF completed an administrative investigation and TDOC decide not to complete a criminal investigation based on the information provided and the employee no longer working at WCF.</p> <p>The facility meets the provisions of this standard based on information from interviews, policy and document review.</p>
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<b>115.64</b>	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a) CoreCivic policy 14-100 requires security staff first responders to: separate the victim from the alleged abuser, preserve and protect evidence at the scene and/or on the victim, take the victim to medical, and notify the highest supervisory</p>

authority on site. These First Responder Duties are provided on a Card that all staff carry. A picture of the card was provided. Some staff that were interviewed showed this auditor the card.

b) CoreCivic policy 14-100 states “If the first staff responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and then shall notify security staff.”

Random Staff Interviews - All staff interviewed were asked to describe their responsibilities and steps they are required to complete when an inmate makes a report of sexual abuse/sexual assault to them. All staff said they were required to separate the victim from the perpetrator, protect evidence on the victim and at the scene, notify the shift supervisor and wait for custody staff to come, take the inmate to medical or take the inmate to medical if asked.

Document Review - The facility reported there were two incidents of non-security staff first responders during the review period. In both cases, the Shift Supervisor was notified, and custody staff took the inmate to medical. A review of twenty-two investigations found that staff first responders acted in accordance with the requirements of this standard. When custody staff were the first responders, they immediately separated the victim from the perpetrator and notified the Shift Supervisor. A sexual abuse incident checklist was completed for all sexual abuse allegations. The checklist covers all possible steps required in response to a report of sexual abuse. The first step is for the first responder to separate the victim and perpetrator.

The facility meets the provisions of this standard based on the information gathered from interviews, policy and document review.

115.65	Coordinated response
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 1563 544 1597"><b>Auditor Discussion</b></p> <p data-bbox="256 1637 1468 1877">The coordinated response plan is included in CoreCivic policy 14-100 under section L and M. The plan describes a Sexual Assault Response Team that includes the PCM, duty officer, medical staff, security staff, mental health staff, and the victim services coordinator. The plan requires the SART assignments to be made by the PCM or ADO in response to a report of sexual abuse. The plan defined the responsibilities of first responders, shift supervisors, executive staff, medical staff, and investigators.</p> <p data-bbox="256 1917 1468 2078">Warden Interview - The Warden said when an inmate makes a report of sexual abuse the first responder notifies the shift supervisor and protects the inmate and evidence. The shift supervisor has the inmate taken to medical for treatment or to arrange for a forensic exam if required. The shift supervisor notifies the PCM, ADO, the Facility</p>

	<p>Investigator and him of the report.</p> <p>Random Staff Interviews – All staff were aware of their responsibilities as part of the facility response plan. Staff said they carry a card that provides them with the steps they are to follow.</p> <p>The facility meets this standard based on information from interviews and the policy review reviewed.</p>
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<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>The facility reported on the pre-audit questionnaire that Whiteville Correctional Facility is not subject to collective bargaining. The PREA Coordinator stated during her interview though some CoreCivic facilities do have collective bargaining, Whiteville Correctional Facility does not and is not prohibited from removing alleged staff abusers form contact with inmates during an investigation.</p> <p>Given that Whiteville Correctional Facility does not have collective bargaining, this standard in not applicable.</p>

<b>115.67</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a) CoreCivic policy 14-100 states “Inmates 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.”</p> <p>“Retaliation Monitoring shall begin as soon as possible following the receipt of a report of sexual abuse. The date that the retaliation monitoring is assigned shall be documented on the 14-2 C Sexual Abuse Incident Check Sheet and the date that the retaliation monitoring began shall be documented on the 14-2D PREA Retaliation Monitoring Report.”</p> <p>A memorandum from the Warden to all staff designates the Facility Investigator as the primary staff for retaliation monitoring and the PREA Compliance Manager, Mental Health Coordinator or the Secretary to the Assistant Warden as back-up.</p> <p>b) CoreCivic policy 14-100 states “The Warden/designee shall determine, on a</p>

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-d) CoreCivic policy 14-100 states “Multiple protection measures may be taken to protect inmates against retaliation. These may include but are not limited to: Housing changes or transfers for inmate victims or abusers, Removal of alleged staff or inmate abusers from contact with victims, Emotional support services for inmates who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations, Periodic status checks, and (e) monitoring disciplinary reports, housing, or program changes.” For inmates, staff are required to meet with the inmate in person once every 30 days for up to 90 days. The monitoring can be continued if needed for an additional 90 days.

e) CoreCivic policy 14-100 states “If any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation.”

f) CoreCivic policy 14-100 states “The facility obligation to monitor retaliation for staff and inmates shall terminate if the facility determines that the allegation is unfounded.”

Staff Designated to Conduct Retaliation Monitoring – The Mental Health Coordinator was interviewed about retaliation monitoring. She said she is contacted immediately after a report of sexual abuse or sexual harassment. She meets with the inmate initially to inform them she will be monitoring for retaliation and there will be a meeting every 30 days. If anything occurs between meetings, the inmate should contact her or tell other staff about the retaliation. She reviews housing assignments, conduct, program changes for any sudden changes. If she sees anything, she will ask the inmate if there is an issue. She also contacts the inmate’s case manager for information about possible retaliation. If retaliation is suspected or there is evidence of retaliation, she contacts the PCM/AW, who has an investigation started. Monitoring will last up to 90 days, and it can continue for an additional 90 days if needed. If there is an unfounded investigation outcome, she stops monitoring. Everything is documented on a form.

Agency Head Interview – The facilities have staff designated to monitor for retaliation. Retaliation against a person that reported sexual abuse by staff or inmates is prohibited. All suspected retaliation is investigated and acted upon accordingly.

Warden Interview – If retaliation is suspected or there is evidence of retaliation, the Warden said he would have the Facility Investigator conduct an investigation. If an inmate is found retaliating against another inmate or staff, he can be disciplined and/or transferred if needed. If staff are retaliating against an inmate or staff, he or she can be put on suspension pending investigation and disciplined up to termination.

Document Review – Retaliation monitoring was conducted in sixteen of the twenty-two investigations reviewed for both sexual abuse and sexual harassment cases. Monitoring was documented on a PREA Retaliation Monitoring Report form every 30

	<p>days for eleven cases. Monitoring ended in three cases due to an unfounded outcome. Monitoring was not started in one case due to an unfounded outcome soon after the report was made. Two investigations of sexual abuse did not have retaliation monitoring as required.</p> <p>Inmates that reported sexual abuse - Thirteen Inmates that reported sexual abuse were interviewed. Seven reported meetings with a staff member several times and being asked if they think anyone was retaliating against them. Some of these inmates said they did not meet with staff for monitoring retaliation but then realized it was the mental health staff that they thought they were seeing for mental health counseling. Six did not recall meeting with staff about retaliation monitoring. One could be verified incomplete as there was no documentation of retaliation monitoring in the investigation file.</p> <p>Corrective Action Required: The facility did not document periodic meetings with all inmates that reported sexual abuse. Retaliation monitoring will be reviewed for 60 days during the corrective action period for compliance with the standard. All completed retaliation monitoring will be provided for review during the corrective action period.</p> <p><b>Corrective Action Completed:</b> The facility conducted retaliation monitoring for five reports of sexual abuse and two reports of sexual harassment. Three inmates were provided monitoring for 90 days. Four were monitored for 60 days during the corrective action period and are still being monitored. The PREA Retaliation Monitoring Report forms and incident reports were provided for review. All meetings were correctly documented and signed by staff conducting the monitoring. Retaliation was reported by one inmate victim and documented on the PREA Retaliation Monitoring Report form. An investigation of the retaliation was conducted. The inmate was moved to another cellhouse as a result. Retaliation monitoring began promptly after the inmate reported an incident.</p> <p>Based on the information from the interviews, policies reviewed and documents reviewed during the corrective action period, this auditor finds the facility meets all provisions of the standard.</p>
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<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>CoreCivic policy 14-100 requires any involuntary use of restrictive housing to protect an inmate that reported sexual abuse shall be subject to the requirements outlined for inmates that are determined to be at high risk of victimization from the PREA assessment (115.43). These requirements were provided for standard 115.43 and include reviewing all housing alternatives to placement in restrictive housing and documenting any restrictions to privileges, programming or work assignments. The</p>

	<p>restrictive housing placement is to be reviewed every 30 days to determine if there is a continued need for separation.</p> <p>Warden Interview - If an inmate is placed in restrictive housing involuntarily after reporting sexual abuse, the Warden said staff would review other housing alternatives prior to placing the victim in restrictive housing. If no safe housing alternative is available in open population, they may review the possibility of transferring to the CoreCivic facility nearby in coordination with the TDOC.</p> <p>Staff who Supervise Segregation - The Chief of Security was interviewed as the staff that supervises the RHU. She said that inmates involuntarily placed in restrictive housing after a report of sexual abuse would still have some access to education or other program materials through workbooks or tablets. Restrictions to privileges and programs would be documented. A review of placement in restrictive housing is conducted within 24 hours, 7 days after placement and then every 30 days. The goal is to get them removed from RHU as soon as it is safe to do so.</p> <p>The facility said there were no inmates to interview that were involuntarily placed in segregation after a report of sexual abuse during the onsite audit. Nine inmates in segregation were interviewed. None of them said they were placed in segregation involuntarily for reporting sexual abuse. In general, inmates did not say the facility had a practice of placing an inmate in segregation if they made a PREA report.</p> <p>Twenty-two investigations were reviewed. In all of the sexual abuse investigations, none of the victims were involuntarily placed in segregation.</p> <p>The facility meets the standard based on information from interviews and the policy reviewed.</p>
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<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a) CoreCivic policy 14-100 states “Facility administrative investigations into allegations of sexual abuse and sexual harassment shall be done promptly, thoroughly and objectively for all allegations including third-party reports and anonymous reports.”</p> <p>Facility Investigator Interview - The Facility Investigator said she receives information from a report of sexual abuse or sexual harassment the same day or next day depending on the type of incident. She begins investigations by reviewing the information from first responders and interviewing the inmate victim. Whether it is third party or anonymous, the investigation process is the same based on the information provided. She will follow up with a third-party reporter if she needs more information. She will investigate an anonymous report the best she can based on the</p>

information provided in the report.

Investigation File Review - During the review period there were thirty reports of sexual abuse or sexual harassment. Fourteen reports of sexual harassment and 6 reports of sexual abuse. All twenty investigations were reviewed. The investigations were prompt as they were started immediately after a report was received by first responders. The Investigator interviewed the alleged victim once she gathered any incident reports that include the initial statement of the victim. The investigator interviewed the alleged victim, the perpetrator, identified witnesses, and reviewed available video.

b) CoreCivic policy 14-100 states "The facility shall use investigators for administrative investigations who have received special training in sexual abuse investigations pursuant to Standards 115.34."

Facility Investigator Interview - The Facility Investigator said she has completed the NIC PREA investigations training online. She also has law enforcement certification from Tennessee.

Investigation File Review - The facility provided a list of thirty completed investigations of sexual abuse and sexual harassment in the last 12 months. Twenty-two administrative investigations for sexual abuse and sexual harassment were selected review. All investigations reports were completed by the designated Facility Investigator.

Corrective Action Required: During the review of investigation files, it was written in one administrative investigation report that staff not designated as a facility investigator were interviewing the alleged perpetrator and thereby assisting in conducting the investigation. This does not follow the standard as the staff did not complete the required investigation training to qualify for participating in investigations.

The Warden must instruct staff that respond to a report of sexual abuse or sexual harassment to only gather information initial from the alleged victim about what happened, when it happened, who was involved and where it happened to provide to investigators and to determine if evidence needs to be protected.

**Corrective Action Completed:** The Warden sent a memorandum to all staff communicating a directive for staff to only gather initial information needed to respond to a report of sexual abuse and sexual harassment. Staff are not to conduct formal interviews of inmates or staff involved to investigate. A copy of the email was provided.

c) CoreCivic policy 14-2 states ""CoreCivic facilities do not conduct criminal investigations into allegations of sexual abuse, TDOC OIC is responsible for ensuring that the requirements of PREA Standards 115.21 and 115.71 are followed for each criminal investigation." The Facility Investigator is required to gather and preserve direct and circumstantial evidence, available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints

and reports of sexual abuse involving the suspected perpetrator in conducting an administrative investigation.

Facility Investigator Interview – The Facility Investigator said in conducting administrative investigations, she reviews video monitoring evidence, physical evidence, conducts interviews with the alleged victim, witnesses, and the alleged perpetrator. She will review the conduct and PREA investigation history for the alleged victim, inmate perpetrator and staff perpetrator.

Investigation File Review – Twenty-two administrative investigations were chosen for review from a list of thirty completed in the last year. All administrative investigation reports documented interviews with the victim, perpetrator, witnesses, video review, history review of the victim and perpetrator, and evidence collected or reviewed.

d) CoreCivic policy 14-100 states “CoreCivic facilities do not conduct criminal investigations into allegations of sexual abuse, TDOC OIC is responsible for ensuring that the requirements of PREA Standards 115.21 and 115.71 are followed for each criminal investigation.” The TDOC OIC investigators complete all criminal investigations and are responsible for consulting with prosecutors prior to compelled interviews. Because TDOC OIC is an external investigation agency, this auditor cannot audit an external agency per FAQ February 19, 2015.

e) Facility Investigator Interview – The Facility Investigator said she reviews the prior conduct and PREA reports for the alleged victim, alleged perpetrator and potential witnesses to determine credibility on an individual basis. She doesn’t use their status as an inmate to determine credibility. She said she would not use a truth telling device on a victim and is not qualified to conduct such a test. No inmate interviewed that reported sexual abuse said they were subjected to a truth telling device examination.

f) CoreCivic policy 14-100 states “Administrative Investigations shall include an effort to determine whether staff actions or failures to act contributed to the abuse.” The policy requires investigations to document physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

Investigation File Review – twenty-two administrative investigation files were selected for review. All twenty-two documented the facts gathered, interviews with the inmate victim, alleged perpetrator (inmate or staff), witnesses, and a review of the credibility of those involved.

Facility Investigator Interview – The Facility Investigator said she completes an investigation report for all administrative investigations conducted. She said she documents the results of interviews with the victim, perpetrator and potential witnesses. She reviews the prior conduct of inmates, disciplinary history of staff and if either have been the subject of a previous PREA investigation.

g) CoreCivic policy 14-100 states “CoreCivic facilities do not conduct criminal investigations into allegations of sexual abuse, TDOC OIC is responsible for ensuring that the requirements of PREA Standards 115.21 and 115.71 are followed for each

criminal investigation. That agency investigative process will be followed for allegations of sexual abuse.” The TDOC OIC investigators complete all criminal investigations and are responsible for the criminal investigation process. Because TDOC OIC is an external investigation agency, this auditor cannot audit an external agency per FAQ February19, 2015.

h) CoreCivic policy 14-100 states “CoreCivic facilities do not conduct criminal investigations into allegations of sexual abuse, TDOC OIC is responsible for ensuring that the requirements of PREA Standards 115.21 and 115.71 are followed for each criminal investigation. That agency investigative process will be followed for allegations of sexual abuse.” The TDOC OIC investigators complete all criminal investigations and are responsible for referring substantiated allegations of conduct that appears to be criminal to prosecutors. Because TDOC OIC is an external investigation agency, this auditor cannot audit an external agency per FAQ February19, 2015.

Investigation File Review - There were ten referrals for prosecution by TDOC documented in administrative investigation reports. The Facility Investigator stated the TDOC OIC Investigator would be referring the subject for prosecution. There was no documentation to verify the referral provided to the facility.

i) CoreCivic policy 14-100 states “The facility shall retain all case records into allegations of sexual abuse, including incident reports, inmate information, investigative reports, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment and/or counseling for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.” The policy meets the requirements for this provision of the standard.

j) CoreCivic policy 14-100 states “The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation.”

Facility Investigator Interview - The Facility Investigator said the investigation is continued based on the information she has prior to the subject leaving. Either she or the TDOC OIC Investigator will attempt to make contact with the alleged perpetrator by phone for interview if this has not been done prior to them leaving.

l) Warden Interview - The Warden said the TDOC OIC Investigators determine when a criminal investigation is required. He said the Facility Investigator assists the TDOC OIC Investigator with interviews and gathering evidence at the facility. After that, the Facility Investigator must request updates on the criminal investigations.

Facility Investigator Interview - The Facility Investigator said if there is a criminal investigation, she assists with interviews with victims and inmates or staff that are the subject of the investigation. She assists the investigator in reviewing video evidence, collection of physical evidence, and arranging interviews with the victim and perpetrator. She contacts the TDOC OIC Investigator on the phone for updates.

Based on the information provided from interviews, policy and documents reviewed, this auditor finds the facility meets the provisions of the standard.

<b>115.72</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>CoreCivic policy 14-100 states “In any sexual abuse or sexual harassment investigation in which the facility is the primary investigating entity, the facility shall utilize a preponderance of the evidence standard for determining whether sexual abuse or sexual harassment has taken place.”</p> <p>Facility Investigator Interview – The Facility Investigator said the standard of evidence she used to substantiate a sexual abuse or sexual harassment investigation is the preponderance of evidence, which is more likely than not or more than 50% of the evidence shows either the incident did happen as reported or did not happen as reported (unfounded).</p> <p>Document Review – Twenty-two administrative investigation files were reviewed for the evidence standard used in determining the outcome. A description of evidence relied on to support the findings was found in all cases that supported preponderance of the evidence as the standard.</p> <p>The facility meets this standard based on the information from the Facility Investigator interview and the review of the administrative investigation files.</p>

<b>115.73</b>	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>a) CoreCivic policy 14-100 states “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.” The policy meets this provision of the standard.</p> <p>The facility reported in the pre-audit questionnaire there were thirty administrative investigations of inmate sexual abuse or sexual harassment where the victim was notified of the outcome during the review period. During the review of twenty-two administrative investigations, the victim was notified of the outcome in all twenty-two investigations using the Inmate PREA Allegation Status Notification form 14-2E.</p> <p>Warden Interview – The Warden said all inmates are notified of the outcome for both sexual abuse and sexual harassment investigations by the Facility Investigator.</p> <p>Investigator Interview – The Facility Investigator said she notifies the alleged victims of the administrative investigation outcome for sexual abuse and sexual harassment involving staff and inmate perpetrators. She said the Inmate PREA Allegation Status</p>

Notification form 14-2E is signed and filed in the inmate record.

Inmate Interviews – Twelve inmates that had reported sexual abuse while housed at WCF were interviewed. Eight said they were notified of the outcome of the investigation. Four said they were not provided with the outcome. Three of the four had a documented refusal to sign the notice of outcome form witnessed by two staff in the investigation files reviewed.

Document Review – Twenty-two completed administrative investigation files were selected for review. A completed Inmate PREA Allegation Status Notification form was provided to inmate victims and reviewed in the case file for all twenty-two investigations. There were twenty-three Inmate PREA Allegation Status Notification forms reviewed. Eight were signed by the inmate victim and fifteen documented a refusal to sign by inmate victims with two staff witnesses.

b) CoreCivic policy 14-100 states “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.” The policy meets this provision of the standard.

Ten sexual abuse investigations were reviewed that were investigated by an outside agency. There was no documented notice of outcome for criminal investigations conducted by TDOC OIC. The Facility Investigator said inmate victims were notified verbally of the criminal investigation outcome by her after she researched the court case online to determine if the case was referred for prosecution and the outcome of the prosecution. The Facility Investigator said TDOC OIC Investigators are not providing the outcome of their investigations. The facility is encouraged to improve communication with the TDOC OIC on the progress of investigations and the outcomes, to include referral for prosecution.

Recommendation: This auditor recommends the Facility Investigator send a written request for the investigation outcome to TDOC OIC Investigators. The written request should be emailed to document the communication.

c) CoreCivic policy 14-100 states “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 the allegation is unfounded) whenever: a. The employee is no longer posted within the inmate's unit as a result of the findings of the investigation; b. The employee is no longer employed at the facility as a result of the allegation; c. The facility learns that the employee has been indicted on a charge related to sexual abuse within the facility; or d. The facility learns that the employee has been convicted on a charge related to sexual abuse within the facility.” The policy meets this provision of the standard.

Document Review – Twenty-two completed investigation files were selected for review. Twelve investigations involved alleged staff sexual abuse or sexual harassment. A completed Inmate PREA Allegation Status Notification form was provided for eleven investigations. One notice was not provided due to the inmate not being housed at WCF when the report was made. The completed form can notify

the inmate victim if the employee is no longer posted in their housing unit, the employee is no longer employed at the facility, the alleged abuser has been indicted or convicted of charges related to sexual abuse. The form also indicates if the investigation was substantiated, unsubstantiated or unfounded.

d) CoreCivic policy 14-100 states “Following an inmate's allegation that he/she has been sexually abused by another inmate, the facility shall subsequently inform the alleged victim whenever: a. The facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or b. The facility learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.” The policy meets this provision of the standard.

Document Review - Twenty-two completed investigation files were selected for review. Ten investigations involved an alleged inmate perpetrator. A completed Inmate PREA Allegation Status Notification form was provided for review for all ten investigations, eight were sexual abuse and two were sexual harassment. The form tells the inmate victim if the alleged abuser was indicted or convicted on a charge related to sexual abuse.

e) CoreCivic policy 14-100 states “All inmate notifications or attempted notifications shall be documented on the 14-100E Inmate Allegation Status Notification. The inmate shall sign the 14-100E, verifying that such notification has been received. The signed 14-100E shall be filed in the inmate's institutional file.” The policy meets this provision of the standard.

The facility reported on the pre-audit questionnaire that there were thirty notifications of outcome given to inmates and documented during the last 12 months.

f) CoreCivic policy 14-100 states “The facility obligation to notify the inmate as outlined in this section shall terminate if the inmate is released from CoreCivic custody.” The policy meets this provision of the standard.

The facility Exceeds this standard based on information gathered from the interviews, documents and policies reviewed. The standard requires a notification of the investigation outcome for sexual abuse cases only, however is providing a written notification of outcome for both sexual abuse and sexual harassment investigations that exceeds the standard.

<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	a) CoreCivic policy 14-100 states “Employees shall be subject to disciplinary sanctions up to and including termination for violating CoreCivic sexual abuse or sexual harassment policies.” The policy meets the provision of the standard.

	<p>b) CoreCivic policy 14-100 states “Termination shall be the presumptive disciplinary sanction for employees who have engaged in sexual abuse.” The policy meets the provision of the standard.</p> <p>During the review period there were no substantiated investigations of staff sexual harassment. There were eight substantiated investigations of staff sexual abuse. All eight were terminated from employment or resigned prior to termination.</p> <p>c) CoreCivic policy 14-100 states “Disciplinary sanctions for employee violations of CoreCivic policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the employee’s disciplinary history, and the sanctions imposed for comparable offenses by other employees with similar histories.” The policy meets the provision of the standard.</p> <p>d) CoreCivic policy 14-100 states “All employee 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.” The policy meets the provision of the standard.</p> <p>HR staff interview – The Human Resources Manager said staff that are found through investigation to have committed sexual abuse of an inmate would be subject to discipline up to termination. She said staff termination was the discipline of the eight incidents involving staff in the last year. She said there were no staff disciplined short of termination for other incidents sexual abuse or sexual harassment in the last year.</p> <p>During the review period there were eight substantiated investigations of staff sexual abuse. All eight resulted in either termination or resignation prior to termination. TDOC conducts all criminal investigations into sexual abuse. The TDOC referred all eight for prosecution. The TDOC did not communicate that the staff were referred to the Prosecutor. The Facility Investigator had to review the status of the case on the court website. It is recommended the facility improve communication with the TDOC OIC investigators for tracking criminal investigation outcomes.</p> <p>The facility meets the provisions of this standard based on the information from interviews, documents and policy reviewed.</p>
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<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) CoreCivic policy 14-100 states “Any 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.” The policy meets this</p>

	<p>provision of the standard.</p> <p>The facility indicated on the Pre-Audit Questionnaire there were no volunteers or contract staff reported to law enforcement as a result of a substantiated investigation during the review period. This auditor found no allegations of sexual harassment or sexual abuse against a volunteer in the review of twenty investigation files for the review period.</p> <p>b) CoreCivic policy 14-100 states “Any other violation of CoreCivic sexual abuse or sexual harassment policies by a contractor or volunteer will result in appropriate corrective action up to and including restricting contact with inmates and removal from the facility.” The policy meets this provision of the standard.</p> <p>Warden Interview – During his interview, the Warden said a contract staff’s access to the facility would be removed if they are the subject of a substantiated administrative investigation of sexual abuse. These cases would also be referred to TDOC Office of Investigation and Conduct for criminal investigation and possible referral for prosecution.</p> <p>The facility meets the provisions of this standard based on information from the Warden interview and policies reviewed.</p>
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<b>115.78</b>	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a) CoreCivic policy 14-100 states “Inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.” The policy meets this provision of the standard.</p> <p>The facility provided a list of thirty complete administrative investigations during the review period. All administrative investigations with a substantiated outcome were selected for review. Twenty-two administrative investigations were reviewed. There were fourteen administrative investigations of sexual abuse by an inmate. Eight administrative investigations of inmate sexual abuse were reviewed. Two had a substantiated outcome. One inmate perpetrator was referred for prosecution from the TDOC OIC criminal investigation and convicted of rape. When the facility was asked for the inmate discipline from the administrative investigations, the Facility Investigator said the inmates were not disciplined.</p> <p>Corrective Action Required: The standard requires an inmate abuser to be subject to a disciplinary process. The facility failed to follow the standard in the two substantiated investigations of inmate sexual abuse. The PREA Coordinated was asked to provide a</p>

directive to the facility to re-educate the staff involved in the inmate discipline to ensure the requirements of this standard are followed in all substantiated cases of inmate sexual abuse.

**Corrective Action Complete:** A copy of the communication from the PREA Coordinator to the facility on November 20, 2025 was provided. The directive said all substantiated outcomes for inmate sexual abuse require the inmate to be subject to discipline.

b) CoreCivic policy 14-100 states "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." The policy meets the provision of the standard.

Warden Interview - The Warden said inmates may be subject to disciplinary sanctions if there is a substantiated finding in an incident of sexual abuse involving an inmate perpetrator. He said the sanctions would be progressive based on the inmate's discipline history and consider any mitigating circumstances, such as mental illness or disabilities.

c) CoreCivic policy 14-100 states "The disciplinary process shall consider whether an inmate's mental disabilities or mental illness contributed to his/her behavior when determining what type of sanction, if any, should be imposed." The policy meets the provision of the standard.

Warden Interview - The Warden said inmates would only be disciplined for committing sexual offenses against staff that did not consent.

d) CoreCivic policy 14-100 states "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." The policy meets the provision of the standard.

Mental Health Staff Interview - The mental health staff interviewed said inmates that are the aggressor in a substantiated investigation of sexual abuse would be referred for mental health services. The inmate could be provided counseling to determine the triggers for the prohibited behavior. She has offered services to two inmate abusers in the last year but they refused.

e) CoreCivic policy 14-100 states "An inmate may be disciplined for sexual conduct with an employee only upon a finding that the employee did not consent to such contact." The policy meets the provision of the standard.

f) CoreCivic policy 14-100 states "Inmates who deliberately allege false claims of sexual abuse may be disciplined. For the purposes of a disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, shall not constitute falsely reporting an incident or lying even if the investigation does not establish evidence sufficient to substantiate the allegation."

	<p>The policy meets the provision of the standard.</p> <p>g) CoreCivic policy 14-100 states “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.” The policy meets the provision of the standard.</p> <p>The facility meets the standard based on the information from interviews, documents and policies reviewed.</p>
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<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a-b) CoreCivic policy 14-100 states “If the screening process indicates that an inmate has experienced prior sexual victimization, or has perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff ensure that the inmate is offered a referral to a medical and/or behavioral health provider within 14 days of the screening utilizing the CR-3431 Institutional Health Services Referral.” The policy meets the requirements of this provision of the standard.</p> <p>Risk Screening Staff - The staff that conduct the initial risk screening said they offer mental health services to inmates that report being a prior victim of sexual abuse either in the community or in an institution. The offer is documented on an Institutional Health Services Referral form and sent to the Mental Health Coordinator. She said they also offer mental health services for prior perpetrators of sexual abuse within 14 days.</p> <p>Mental Health Staff Interview - The Mental Health Coordinator said she gets referrals for inmates that report being a prior victim of sexual abuse by Case Managers sending her a Health Services Referral form. She said the inmates that are prior perpetrators of sexual abuse are offered mental health services within 14 days of arrival.</p> <p>Document Review - Forty Screening Assessments were selected randomly from a list of inmates that arrived in the last year. One inmate reported being a prior victim of sexual abuse on the risk assessment. The Institutional Health Services Referral form was provided but did not coincide with the intake date and was not within 14 days of arrival. Eleven inmates were documented as prior perpetrators of sexual abuse. Eight had a documented mental health referral form within 14 days of arrival. The mental health referral form was provided for two of the three prior perpetrators of sexual abuse for dates that did not match the intake dates selected from the intake list and were not within 14 days of arrival. One was not provided. An additional request was made for the Institutional Health Services Referral forms for one prior victim and three prior perpetrators, however documentation to support compliance</p>

with the standard could not be provided.

The policy requires prior victims and prior perpetrators of sexual abuse to be referred to mental health within 14 days using Institutional Health Services Referral form.

Referrals were not completed for all inmates that were prior victims and prior perpetrators.

The Facility must review the current process for mental health referrals, provide staff training and provide the Institutional Health Services Referral forms during the corrective action period for all inmates that report being a prior victim of sexual abuse or are determined to be a prior perpetrator of sexual abuse.

d) CoreCivic policy 13-79 Sexual Assault Response states “Any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by federal, state, or local law.” The policy meets the requirements of this provision of the standard.

Tour Observation – medical files were located in an office that was in an area restricted to inmates. The files were in locked cabinets and in an office that could be locked.

Risk Screening Staff Interviews – Both Case Managers that complete risk assessments said the information obtained during the screening is confidential and access is limited to specific staff. Only the results of the assessment are shared with staff for bed and program assignments.

e) CoreCivic policy 14-100 states “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.” The policy meets the requirements of this provision of the standard.

Mental Health Staff Interview – The Mental Health Coordinator said if an inmate reported prior sexual abuse that occurred outside of a correctional institution, she would have to be given consent to share that information with facility investigators.

Medical Staff Interview – The medical staff said if an inmate reported prior sexual abuse that occurred outside of a correctional institution, she would have to be given consent to share that information with facility investigators.

Corrective Action Required: The policy requires prior victims and prior perpetrators of sexual abuse to be referred to mental health within 14 days of intake to the facility using the Institutional Health Services Referral form. The initial risk assessment and Institutional Health Services Referral form will be provided for review for all inmates that are prior victims and perpetrators of sexual abuse for at least 60 days during the corrective action period.

**Corrective Action Completed:** Mental health referral forms and intake risk

	<p>assessments were provided for twenty-five inmates that arrived during the 60 days following the interim report (December – February). There were Twenty-one inmates that were prior perpetrators of sexual abuse and four inmates that reported being a prior victim of sexual abuse. All twenty-five had a referral to mental health completed that same day of intake that meets the 14-day requirement. Mental health staff documented seeing the inmate a few days after the referral.</p> <p>Based on the information from interviews, policies, and documents reviewed, the auditor has determined the facility has completed the corrective action and meets all provisions of the standard.</p>
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<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) CoreCivic policy 14-100 states “Inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The facility shall provide victims of sexual abuse with medical and mental health services consistent with the community level of care.”</p> <p>Medical Staff interview – The Medical Staff said a victim of sexual abuse or sexual assault would be evaluated for emergent injuries, stabilized and sent the local hospital for emergency medical services when required.</p> <p>Mental Health Staff Interview – The Mental Health Staff interviewed said crisis counseling services are offered and provided to inmate victims of sexual abuse. If accepted, she will schedule the inmate to see the psychologist.</p> <p>Inmates that Reported Sexual Abuse – Thirteen inmates that reported sexual abuse while at WCF were interviewed. All reported being offered and/or provided medical and mental health services. Documentation in the investigation files reviewed indicated inmate victims were offered medical and mental health services at the time of reporting the incident to staff.</p> <p>b) CoreCivic policy 14-100 states “If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, security staff first responders shall take preliminary steps to protect the victim and shall immediately notify the appropriate medical and mental health practitioners.”</p> <p>Staff Interviews – All randomly selected staff were asked about first responder duties. All staff said they would protect the victim, notify the shift supervisor and wait for other custody staff and medical staff to respond. Some said they may be asked to take the inmate to medical.</p> <p>c) CoreCivic policy 14-100 states “Inmate victims of sexual abuse shall be</p>

	<p>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.”</p> <p>Medical Staff Interview – Medical staff interviewed said victims of sexual assault/sexual abuse can be offered STI testing and treatment at the emergency room or at the facility if they do not go to the hospital.</p> <p>d) CoreCivic policy 14-100 states “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.”</p> <p>Inmates that reported Sexual Abuse – Inmates that reported sexual abuse said they were offered mental health and medical services. The offer wasn’t contingent upon their cooperation. None said they were not charged for the services.</p> <p>Investigation File Review – Twenty-two completed investigation files involving eighteen sexual abuse and four sexual harassment incidents were reviewed. The inmate victim was immediately offered medical services in Twenty-one of the cases. One was a report received from another facility where the inmate was housed and was not offered services. Twelve inmate victims were seen by medical staff and nine inmate victims refused medical services.</p> <p>The facility meets the provisions of this standard based on information from interviews, policy and documents reviewed.</p>
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<p><b>115.83</b></p>	<p><b>Ongoing medical and mental health care for sexual abuse victims and abusers</b></p>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>a) CoreCivic policy 13-79 states “The facility shall offer medical and mental health evaluation and, as appropriate, treatment to all inmates/detainees who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.” The policy meets the requirements of this provision of the standard.</p> <p>b) CoreCivic policy 13-79 states “The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.” The policies meet the requirements of this provision of the standard.</p> <p>Medical Staff Interview – The medical staff interviewed said an inmate victim would be offered a mental health referral, medical monitoring and treatment of wounds or injuries and access to medications for STI where appropriate. If the inmate returns</p>

from the hospital with STI medications, the medical staff will assist by dispensing medication and monitoring the inmate.

Mental Health Staff Interview – The mental health staff interviewed said mental health counseling follow up services and treatment would be offered and provided to an inmate victim of sexual abuse. Referral could be made to outside services if they are released.

Inmate Interviews – Nine of the twelve inmates that reported sexual abuse said they were saw medical and were offered ongoing mental health counseling. Three that did not see medical had refused medical services. Documentation of victims being seen by medical was provided in the investigation case files.

c) CoreCivic policy 13-79 states “The facility shall provide such victims with medical and mental health services consistent with the community level of care.” The policy meets the requirements of this provision of the standard.

Medical and Mental Health Staff Interview – The medical and mental health staff interviewed said the level of care they can provide is consistent with the community level of care.

Document Review – An Accident/Incident/injury Report was provided for the inmate victim for twenty-two completed investigations during the review period. The victim was offered medical and mental health services in all twenty-two cases with nine victims refusing treatment. The level of care appeared to be consistent with the community level of care based on the documentation provided.

f) CoreCivic policy 13-79 and 14-100 states “Inmate victims of sexual abuse shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.” The policy meets the requirements of this provision of the standard.

Medical Staff Interview – the medical staff interviewed said that testing for STI’s would be completed at a forensic examination. If the inmate victim refused the forensic exam or if there was too much time since the abuse occurred, the facility medical staff would offer and conduct a test and treatment for STI’s at the facility.

g) CoreCivic policy 13-79 and 14-100 states “Treatment services shall be provided to all victims of sexual abuse while incarcerated without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.” The policy meets the requirements of this provision of the standard.

TDOC policy 113.15 Inmate Co-Payment for Health Services provides a list of non-chargeable services. Sexual assault examinations, including mental health services necessary to treat the offender are included on the list.

Inmates that reported Sexual Abuse – Inmates that reported sexual abuse said they were offered mental health and medical services. The offer wasn’t contingent upon

	<p>their cooperation. Those that accepted did not say they were charged.</p> <p>h) CoreCivic policy 14-100 states “A mental health evaluation shall be completed on all known inmate-on-inmate abusers within 60 days of learning of such abuse history. Treatment shall be offered when deemed appropriate by mental health practitioners.” The policy meets the requirements of this provision of the standard.</p> <p>Mental Health Interview – The Mental Health Staff said the inmate perpetrator is offered mental health for services if there is a substantiated incident of inmate sexual abuse. She can offer therapy to identify triggers for the behavior. There have been no inmate victims that have accepted the offer in the last year.</p> <p>There were two substantiated investigations of inmate sexual abuse during the review period that require an offer of mental health counseling to the inmate perpetrator. Documentation of the mental health referral could not be provided as requested or found in the investigation case file.</p> <p>Corrective Action Required: The CoreCivic PREA Coordinator will provide additional training to facility staff involved in providing and monitoring mental health referrals for inmate victims and inmate perpetrators in sexual abuse cases. Documentation of the training and applicable mental health referrals for known perpetrators of sexual abuse from completed investigations at WCF shall be provided for review during the corrective action period.</p> <p><b>Corrective Action Completed:</b> The PREA Coordinator provided training to a new Facility Investigator regarding the requirements of this standard for a documented mental health referral for inmate victims and inmate perpetrators after the completion of investigations with a substantiated outcome. The PREA Coordinator and PCM said there were no substantiated investigations of sexual abuse that required a mental health referral for the inmate victim and Inmate perpetrator during the corrective action period. The PREA coordinator provided documentation of the training provided to the new Facility Investigator.</p> <p>Based on the information from documentation of corrective action, interviews, policies and documents reviewed, it has been determined the facility meets the provisions of this standard.</p>
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<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a) CoreCivic policy 14-100 states “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.”</p>

- b) CoreCivic policy 14-100 states "Sexual Abuse Incident reviews review shall occur within 30 days of the conclusion of the investigation."
- c) CoreCivic policy 14-100 states "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."
- d) CoreCivic policy 14-100 states "All findings and recommendations for improvement will be documented on the 14-100F Sexual Abuse or Assault Incident Review Report or required equivalent contracting agency form. Completed 14-2F forms will be forwarded to the Warden/Facility Administrator, the PREA Compliance Manager, and the FSC PREA Compliance Coordinator/designee."
- e) CoreCivic policy 14-100 states "The facility shall implement the recommendations for improvement or shall document reasons for not doing so."

Document Review – Sixteen sexual abuse incident reviews were provided for review. Fourteen incidents of sexual abuse that were not unfounded were reviewed as required and documented on a Sexual Abuse or Assault Incident Review Report. Two were not completed by the previous PCM. One was completed just outside of the required 30 days. This does not support substantial compliance with the standard for the review period.

Review Team Staff Interview – The Facility Investigator was interviewed as a member of the incident review team. She said the team consists of PCM/AW, Investigator, medical staff, mental health staff, and the Security Supervisor. The team reviews all evidence for the case. This may include the review of video in addition to the review of the investigation report and accompanying documents. They review the staff response, the mental health referral, offer or use of victim advocate, and retaliation monitoring that may be ongoing. If the team has recommendations for changes to staffing, cameras or policy, it is written on the form and sent to the Warden for review and approval. A form is completed to document the review. She said the completed form is sent to the CoreCivic PC by the PCM/AW.

PCM Interview – The PCM/AW, that coordinates the incident review team, said the team consists of the PREA Case Manager, Investigator, medical staff, mental health staff, and Security Supervisor. The team reviews all evidence for the case. This may include the review of video evidence in addition to the review of the investigation report and accompanying documents. They may ask staff that were involved in the response to attend the review. They also look at the mental health referral, offer or use of victim advocate and the retaliation monitoring that may be ongoing. If the team has recommendations for policy changes, additional cameras or changes to staffing, they are documented on the review form and provided to the Warden for review and approval. If recommendations cannot be approved, the Warden will document why. The completed form is sent to the CoreCivic PREA Coordinator.

Warden Interview - The Warden said the SART reviews each PREA investigation. The SART consists of the Assistant Wardens, Chief of Custody, Assistant Chief of Custody, Facility Investigator, medical staff, mental health staff, and the PCM. The team

	<p>reviews all completed investigations to determine if there was something that could have been prevented, if the response was appropriate, were there blind spots, if staff were conducting proper rounds, and if the inmate/detainee was classified appropriately. The team makes recommendations for correction to him for review and approval.</p> <p>Corrective Action Required: The current PCM has been at the facility for four months prior to the onsite audit. Three sexual abuse incident reviews were not completed as required by the standard from the beginning of the review period. Sexual abuse incident reviews of completed investigations after the onsite audit will be provided to the auditor for review during the corrective action period. The status of the standard will be reviewed after 60 days in the corrective action period.</p> <p><b>Corrective Action Completed:</b> The facility had completed five investigations for reports of sexual abuse during the review period. Two investigations had an outcome that required an incident review. Both reviews were completed within 30 days of the investigation completion date. All were documented on a Sexual Abuse or Assault Incident Review Report that was signed by the PCM and approved by the Warden. It has been determined from the document review that the facility now meets the standard.</p> <p>Based on the information from interviews, policies and documents reviewed prior to the onsite audit and during the corrective action period, it has been determined the facility meets all provisions of the standard.</p>
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<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a) CoreCivic policy 14-100 states “CoreCivic shall collect accurate and uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. Each facility will ensure that incidents of sexual abuse are entered into the 5-1 Incident Report Database (IRD) as required by CoreCivic Policy 5-1 Incident Reporting and 5-1BB PREA 5-1 IRD Incident Reporting Definitions.” The Incident Reporting Definitions were reviewed and found to be based on the PREA standards definitions for sexual abuse and sexual harassment. The policy meets the requirements of this provision.</p> <p>5-1A Incident Report and 5-1E PREA Reporting forms were provided with each completed investigation case file reviewed.</p> <p>b-c) CoreCivic policy 14-100 states “The incident-based sexual abuse data shall be aggregated annually and shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Victimization conducted by the Department of Justice.” The policy meets the requirements of this</p>

	<p>provision.</p> <p>Document Review – The CoreCivic Annual PREA Reports for 2022, 2023 and 2024 were provided for review. The annual reports compared the current year’s PREA incident data to previous years. The Survey of Sexual Victimization was completed for WCF for 2022 and 2023. The PREA Coordinator said the request was received for 2204 but is not due yet.</p> <p>d) CoreCivic policy 14-100 states “CoreCivic shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.” The policy meets the requirements of this provision.</p> <p>f) CoreCivic policy 14-100 states “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.” The policy meets the requirements of this provision.</p> <p>Document Review – The Survey of Sexual Victimization for WCF was completed for 2022 and 2023.</p> <p>Based on the interviews, policies and documents reviewed, the facility meets all provisions of this standard.</p>
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<b>115.88</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a) CoreCivic policy 14-100 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, detection, and response policies, practices, and training, to include Identifying problem areas and taking corrective action on an ongoing basis.” The policy meets the requirements of this provision.</p> <p>Document Review – The CoreCivic Annual PREA Reports for 2022, 2023 and 2024 were provided for review. The reports include information about identified problem areas and corrective actions.</p> <p>Agency Head Interview – The CoreCivic Vice President said PREA data is reviewed on a regular basis and compiled in an annual report. He reviews and approves the annual report.</p> <p>PRE Coordinator Interview - The PREA Coordinator said she gathers PREA data from the facilities and combines it in an annual CoreCivic PREA Report that is posted on the CoreCivic website. The report is used to assess and improve the PREA program.</p>

	<p>PREA Compliance Manager Interview - The PREA Compliance Manager said the PREA incident data is entered into the Incident Reporting Database. All sexual abuse incident reviews are sent to the CoreCivic PREA Coordinator for review. Information for the PREA annual report can be gathered from the IRD and incident reviews.</p> <p>b) CoreCivic policy 14-100 states “CoreCivic will prepare an annual report of its findings and corrective actions for each facility, as well as the agency as a whole. Such report shall include a comparison of the current year’s aggregated data and corrective actions with those from prior years and shall provide an assessment of the agency’s progress in addressing sexual abuse.” The policy meets the requirements of this provision.</p> <p>Document Review – The CoreCivic Annual PREA Reports for 2022, 2023 and 2024 were provided for review. The annual reports compared the current year’s data to previous years.</p> <p>c) CoreCivic policy 14-100 states “The CoreCivic Annual report shall be approved by the company Chief Corrections Officer and made available to the public through the CoreCivic website.” The policy meets the requirements of this provision.</p> <p>Document Review – The CoreCivic Annual PREA Reports for 2022, 2023 and 2024 were provided for review. The reports were signed by the Vice President. CoreCivic Annual PREA Reports from 2013 to 2024 are posted on the CoreCivic PREA page at <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>Agency Head Interview – The Vice President said PREA data is reviewed daily, weekly and on an annual basis. Leadership reviews all substantiated cases weekly. Facilities provide PREA data monthly that is used to complete the annual report. He reviews and approves the annual report.</p> <p>d) CoreCivic policy 14-100 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.” The policy meets the requirements of this provision.</p> <p>PREA Coordinator Interview – The PREA Coordinator said the annual report does not include the identity or personal and medical information for inmates or staff.</p> <p>Based on the Interviews, policies and documents reviewed, the facility meets all provisions of this standard.</p>
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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>
	a) CoreCivic policy 14-100 states “All case records associated with claims of

	<p>sexual abuse, including incident reports, investigative reports, inmate/detainee information, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment and/or counseling shall be retained in accordance with CoreCivic Policy 1-15 Retention of Records.”</p> <p>PREA Coordinator Interview – The PREA Coordinator said files and information from investigations are retained in the IRD Incident Report Database. The IRD is a secure database with limited access to authorized staff.</p> <p>Tour Observations - All hardcopy files are in a locked filing cabinet in a locked office of the Investigator.</p> <p>b) CoreCivic policy 14-100 states “The CoreCivic Annual report shall be approved by the company Chief Corrections Officer and made available to the public through the CoreCivic website.”</p> <p>Document Review – The CoreCivic Annual PREA Report for 2022, 2023 and 2024 were provided for review. These reports were found on the CoreCivic website at <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>c) CoreCivic policy 14-100 states “Before making aggregated sexual abuse data publicly available, CoreCivic shall remove all personal identifiers.”</p> <p>Document Review – The CoreCivic Annual PREA Report for 2022, 2023 and 2024 were provided for review. No personal identifiers were found in the reports.</p> <p>d) CoreCivic policy 14-100 states “The agency shall 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.”</p> <p>A review of the CoreCivic webpage <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> found PREA Annual Reports from 2013 to 2024.</p> <p>Based on the Interviews, policies and documents reviewed, the facility meets all provisions of this standard.</p>
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<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>a) CoreCivic policy 14-100 states “Each CoreCivic facility shall be audited at least once in each PREA Audit cycle by a certified PREA Auditor external to CoreCivic to ensure compliance with the PREA National Standards. The FSC PREA Coordinator shall coordinate and schedule all external audits in coordination with the TDOC PREA Coordinator.”</p>

	<p>A review of the CoreCivic webpage for Whiteville Correctional Facility at <a href="https://www.corecivic.com/facilities/whiteville-correctional-facility">https://www.corecivic.com/facilities/whiteville-correctional-facility</a> found three PREA audit reports posted for 2015, 2020 and 2022.</p> <p>b) PREA Coordinator Interview - CoreCivic has been receiving audits in its facilities every year since 2014. The PREA Coordinator said CoreCivic attempts to have one-third of its facilities audited each year, however the clients may make changes to their audit schedule that prevents CoreCivic from meeting that goal. A state DOC could move the CoreCivic facility audit to correct the state's one-third goal. This is out of CoreCivic's control.</p> <p>h) This auditor was allowed access to all areas of the facility during the facility tour.</p> <p>i) This auditor was provided with all documents requested, either electronic or hard copy.</p> <p>m) This auditor was allowed to interview inmates in a private area during the onsite audit.</p> <p>n) Inmates were allowed to send confidential correspondence to this auditor. One letter was received prior to the onsite audit.</p>
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<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>f. PREA Coordinator Interview - CoreCivic has been receiving audits in its facilities every year since 2014. The PREA Coordinator said CoreCivic attempts to have one-third of its facilities audited each year, however the clients may make changes to their audit schedule that prevents CoreCivic from meeting that goal. A state DOC could move the CoreCivic facility audit to correct the state's one-third goal. This is out of CoreCivic's control.</p> <p>A review of the CoreCivic webpage for Whiteville Correctional Facility at <a href="https://www.corecivic.com/facilities/whiteville-correctional-facility">https://www.corecivic.com/facilities/whiteville-correctional-facility</a> found three PREA audit reports posted for 2015, 2020 and 2022.</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	na

	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.)	
<b>115.13 (a)</b>	<b>Supervision and monitoring</b>	
	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	yes

	consideration: Any applicable State or local laws, regulations, or standards?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
<b>115.13 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
<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.)	na
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the	na

	facility does not have female inmates.)	
<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)?	na
<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>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.15 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<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 with inmates with disabilities including inmates who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in	yes

	formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	
<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	yes

	U.S.C. 1997)?	
	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) 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) 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) 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) Hiring and promotion decisions</b>		
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes

<b>115.17 (f)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
<b>115.17 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit,	na

	whichever is later.)	
<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.)	na
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice’s Office on Violence Against Women publication, “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/ Adolescents,” or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	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
<b>115.22 (c)</b>	<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
<b>115.31 (a)</b>	<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	yes

	inmates on how to avoid inappropriate relationships with inmates?	
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	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	yes

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

	prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
<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.)	na

<b>115.35 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (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
<b>115.41 (d)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	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) 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) 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) 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	yes

	being sexually abusive, to inform: Work Assignments?	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
<b>115.42 (b)</b>	<b>Use of screening information</b>	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
<b>115.42 (c)</b>	<b>Use of screening information</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.42 (d)</b>	<b>Use of screening information</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.42 (e)</b>	<b>Use of screening information</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.42 (f)</b>	<b>Use of screening information</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.42 (g)</b>	<b>Use of screening information</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<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) 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) 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) 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) 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) 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) 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	na

	and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	
<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.	no
<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.)	na
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	na
<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.)	na
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency	na

	is exempt from this standard.)	
<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.)	na
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	na
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	na
<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.)	na
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	na
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	na
<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.)	na

	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	na
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	na
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	na
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	na
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	na
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	na
<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.)	na
<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.)	na
	Does the facility enable reasonable communication between	yes

	inmates and these organizations and agencies, in as confidential a manner as possible?	
<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	yes

	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?	
<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	no

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

	of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	
	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) Agency protection against retaliation</b>		
	In the case of inmates, does such monitoring also include periodic status checks?	yes
<b>115.67 (e) 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) 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) 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,	yes

	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).)	
<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	yes

	order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	
<b>115.73 (c) 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) 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	yes

	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.)	
<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).	na
<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.)	na
<b>115.83 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. 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.)	na
<b>115.83 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.83 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes
<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation	yes

	has been determined to be unfounded?	
<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
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	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.)	na
<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>Frequency and scope of audits</b>	

<b>(b)</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>	
	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	yes

	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.)	
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