

# PREA Facility Audit Report: Final

**Name of Facility:** Howard McLeod Correctional Center

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 12/18/2024

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> Haley Boaen	<b>Date of Signature:</b> 12/18/2024

AUDITOR INFORMATION	
<b>Auditor name:</b>	Boaen, Haley
<b>Email:</b>	haleyboaen@yahoo.com
<b>Start Date of On-Site Audit:</b>	11/14/2024
<b>End Date of On-Site Audit:</b>	11/15/2024

FACILITY INFORMATION	
<b>Facility name:</b>	Howard McLeod Correctional Center
<b>Facility physical address:</b>	19603 East Whippoorwill Lane, Atoka, Oklahoma - 74525
<b>Facility mailing address:</b>	

Primary Contact
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<b>Name:</b>	Ryan Graham
<b>Email Address:</b>	ryan.graham@doc.ok.gov
<b>Telephone Number:</b>	405-250-6072

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Kameron Harvanek
<b>Email Address:</b>	Kameron.Harvanek@doc.ok.gov
<b>Telephone Number:</b>	405-627-7835

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	Ryan Graham
<b>Email Address:</b>	Ryan.Graham@doc.ok.gov
<b>Telephone Number:</b>	580-889-6651

<b>Facility Health Service Administrator On-site</b>	
<b>Name:</b>	Brandi Birchfield
<b>Email Address:</b>	brandi.birchfield@doc.ok.gov
<b>Telephone Number:</b>	405-590-5974

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	691
<b>Current population of facility:</b>	686
<b>Average daily population for the past 12 months:</b>	688
<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>	Mens/boys

<p><b>Which population(s) does the facility hold? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For definitions of “intersex” and “transgender,” please see <a href="https://www.prearesourcecenter.org/standard/115-5">https://www.prearesourcecenter.org/standard/115-5</a>)</b></p>	
<p><b>Age range of population:</b></p>	20-97
<p><b>Facility security levels/inmate custody levels:</b></p>	Minimum
<p><b>Does the facility hold youthful inmates?</b></p>	No
<p><b>Number of staff currently employed at the facility who may have contact with inmates:</b></p>	94
<p><b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b></p>	5
<p><b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b></p>	79

<b>AGENCY INFORMATION</b>	
<b>Name of agency:</b>	Oklahoma Department of Corrections
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	3400 Martin Luther King Avenue, Oklahoma, Oklahoma - 73111
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

<b>Agency Chief Executive Officer Information:</b>	
<b>Name:</b>	

<b>Email Address:</b>	
<b>Telephone Number:</b>	

<b>Agency-Wide PREA Coordinator Information</b>			
<b>Name:</b>	Miciah Ahrnsbrak	<b>Email Address:</b>	miciah.ahrnsbrak@doc.ok.gov

## **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:**

18	<ul style="list-style-type: none"> <li>• 115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</li> <li>• 115.13 - Supervision and monitoring</li> <li>• 115.15 - Limits to cross-gender viewing and searches</li> <li>• 115.16 - Inmates with disabilities and inmates who are limited English proficient</li> <li>• 115.17 - Hiring and promotion decisions</li> <li>• 115.18 - Upgrades to facilities and technologies</li> <li>• 115.22 - Policies to ensure referrals of allegations for investigations</li> </ul>
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	<ul style="list-style-type: none"> <li>• 115.31 - Employee training</li> <li>• 115.32 - Volunteer and contractor training</li> <li>• 115.33 - Inmate education</li> <li>• 115.34 - Specialized training: Investigations</li> <li>• 115.35 - Specialized training: Medical and mental health care</li> <li>• 115.51 - Inmate reporting</li> <li>• 115.54 - Third-party reporting</li> <li>• 115.62 - Agency protection duties</li> <li>• 115.65 - Coordinated response</li> <li>• 115.67 - Agency protection against retaliation</li> <li>• 115.68 - Post-allegation protective custody</li> </ul>
<b>Number of standards met:</b>	
27	
<b>Number of standards not met:</b>	
0	

## POST-AUDIT REPORTING INFORMATION

### GENERAL AUDIT INFORMATION

#### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-11-14
2. End date of the onsite portion of the audit:	2024-11-15

#### Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	This auditor contacted the Crisis Control Center; however, no one has returned my phone call. I was able to speak with SANE nurse who provides services to inmates who allege sexual abuse.

### AUDITED FACILITY INFORMATION

14. Designated facility capacity:	691
15. Average daily population for the past 12 months:	688
16. Number of inmate/resident/detainee housing units:	4
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

<b>18. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	684
<b>19. 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>	9
<b>20. 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>	9
<b>21. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>22. 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>23. 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>	4
<b>24. 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>	1

<p><b>25. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>2</p>
<p><b>26. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>27. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>16</p>
<p><b>28. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>29. 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>No text provided.</p>
<p><b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b></p>	
<p><b>30. 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>94</p>
<p><b>31. 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>79</p>



<p><b>32. 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>5</p>
<p><b>33. 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>
<p><b>INTERVIEWS</b></p>	
<p><b>Inmate/Resident/Detainee Interviews</b></p>	
<p><b>Random Inmate/Resident/Detainee Interviews</b></p>	
<p><b>34. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>30</p>
<p><b>35. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b></p>	<p> <input checked="" type="checkbox"/> Age  <input checked="" type="checkbox"/> Race  <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)  <input checked="" type="checkbox"/> Length of time in the facility  <input checked="" type="checkbox"/> Housing assignment  <input type="checkbox"/> Gender  <input type="checkbox"/> Other  <input type="checkbox"/> None </p>
<p><b>36. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b></p>	<p>The auditor randomly selected a representative from the following categories to effectively represent the inmate population: age, race, ethnicity (e.g., Hispanic, non-Hispanic), length of time in the facility, and housing assignment.</p>

<b>37. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>38. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b>	No text provided.
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
<b>39. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	17
<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>40. 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>	6
<b>41. 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>	3

<b>42. 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>	2
<b>43. 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>	1
<b>44. 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>	2
<b>45. 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>	1
<b>46. 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>	2
<b>47. 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>	0

<p><b>47. 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>47. 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>This auditor reviewed samples of investigations, interviews with the warden, PREA Compliance Manager, Medical/Mental health, and staff responsible for screening so sexual abusiveness and predatoriness.</p>
<p><b>48. 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>0</p>
<p><b>48. 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>48. 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>This auditor reviewed samples of investigations, interviews with the warden, PREA Compliance Manager, Medical/Mental health, and staff responsible for screening so sexual abusiveness and predatoriness.</p>

<p><b>49. 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>49. 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>49. 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>This auditor reviewed samples of investigations, interviews with the warden, PREA Compliance Manager, Medical/Mental health, and staff responsible for screening so sexual abusiveness and predatoriness.</p>
<p><b>50. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>No text provided.</p>
<p><b>Staff, Volunteer, and Contractor Interviews</b></p>	
<p><b>Random Staff Interviews</b></p>	
<p><b>51. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>15</p>

<p><b>52. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b></p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" 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>53. 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>54. 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>55. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b></p>	<p>12</p>
<p><b>56. 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>57. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<b>58. Were you able to interview the PREA Coordinator?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>59. Were you able to interview the PREA Compliance Manager?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

**60. 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>61. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>62. 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>62. Enter the total number of CONTRACTORS who were interviewed:</b>	1
<b>62. 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 checked="" type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
<b>63. 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.

<b>64. Did you have access to all areas of the facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>Was the site review an active, inquiring process that included the following:</b>	
<b>65. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>66. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>67. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>68. Informal conversations with staff during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No

<p><b>69. 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>70. 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>71. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</b></p>	<p>No text provided.</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.

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

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

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

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

## Sexual Abuse and Sexual Harassment Investigation Outcomes

### Sexual Abuse Investigation Outcomes

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

#### 74. Criminal SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	0	0	0	0
<b>Staff-on-inmate sexual abuse</b>	0	1	0	0
<b>Total</b>	0	0	0	0

### Sexual Harassment Investigation Outcomes

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

**76. 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

**77. 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	0	0
<b>Staff-on-inmate sexual harassment</b>	0	0	0	0
<b>Total</b>	0	0	0	0

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

**Sexual Abuse Investigation Files Selected for Review**

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

2

<p><b>79. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p><b>Inmate-on-inmate sexual abuse investigation files</b></p>	
<p><b>80. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>1</p>
<p><b>81. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>82. 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>83. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>1</p>
<p><b>84. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p><b>85. 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>86. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>0</p>
<p><b>86. Explain why you were unable to review any sexual harassment investigation files:</b></p>	<p>There were no allegations of inmate-on-inmate sexual harassment or staff-on-inmate sexual harassment during the documentation review period.</p>
<p><b>87. 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 type="radio"/> No</p> <p><input checked="" 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>88. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>0</p>
<p><b>89. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>



<p><b>90. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p><b>Staff-on-inmate sexual harassment investigation files</b></p>	
<p><b>91. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>0</p>
<p><b>92. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p><b>93. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p><b>94. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</b></p>	<p>No text provided.</p>

## SUPPORT STAFF INFORMATION

### DOJ-certified PREA Auditors Support Staff

95. 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.

- Yes
- No

### Non-certified Support Staff

96. 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

97. 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

Identify the name of the third-party auditing entity

Correctional Consulting Services

<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> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</p> <p>Oklahoma Department of Corrections Policy: OP-030601 Prison Rape Elimination Act Policy</p> <p>a) The Oklahoma Department of Corrections Policy: OP-030601 Prison Rape Elimination Act Policy outlines the agency’s mandated zero tolerance toward all forms of sexual abuse and sexual harassment. The policy details the agency’s approach to preventing, detecting, and responding to such conduct to sexual abuse and sexual harassment. When interviewing staff members, they were knowledgeable and understood the policy and actions relevant to their job duties.</p> <p>b) The agency employs an upper-level, agency wide PREA Coordinator who has sufficient time and authority to develop, implement, and oversee agency efforts to</p>

	<p>comply with the PREA standards of all facilities. A review of the organizational chart indicated the PREA Coordinator reports to the General Counsel and was verified during the interview. The PREA Coordinator works directly with the PREA Manager, the PREA Manager is a second agency level position. This position is also dedicated to the implementation of the PREA Standards throughout the OKDOC.</p> <p>c) The agency has also designated a PREA Compliance Manager (Deputy Warden) at each of their facilities, verified by reviewing the organizational chart. The As stated in the PAQ, the Deputy Warden reports directly to the warden of the facility. During the interview with the PREA Compliance Manager they stated that they have enough time and authority to implement the PREA Standards at the facility. While conducting the onsite portion of the audit, the PREA Compliance Manager was making routine tours of the facility to ensure overall operational safety, to include PREA rounds for sexual safety. This was also verified by reviewing upper-level supervisory rounds logs. While conducting the onsite portion it was observed the policies in daily practice and was further confirmed during interviews with both staff and inmates.</p> <p>Based on a review of agency policy, and informal and formal interviews with staff, the Auditor has determined that the facility has exceeded this standard.</p>
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<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Standard 115.12 - Contracting with other entities for the confinement of inmates</p> <p>Per the information provided in the PAQ, the agency has not entered into or renewed a contract for the confinement of inmates since the last PREA audit.</p> <p>Based on the information provided, the facility is in compliance with Standard 115.12.</p>

<b>115.13</b>	<b>Supervision and monitoring</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p><b>Auditor Discussion</b></p> <p>Standard 115.13 - Supervision and monitoring</p> <p>The HMCC staffing plan, shift rosters, and camera surveillance was reviewed.</p>

(a)(b) At least once per year the facility/agency, along with the PREA Coordinator, reviews the staffing plan to determine if any adjustments are necessary. In accordance with the staffing plan and the observation during the onsite review, the facility/agency creates, documents, and makes best efforts to comply on a regular basis with a staffing plan that provides for adequate staffing levels, and where applicable, video monitoring, to protect inmates against sexual abuse. When determining adequate staffing levels and the need for video monitoring, the facility takes into consideration

- 1) generally accepted correctional practices,
- 2) judicial findings of inadequacy,
- 3) any findings of inadequacy from Federal investigative agencies,
- 4) any findings of inadequacy from internal or external oversight bodies,
- 5) all components of the facility's physical plant (including blind spots or areas where staff or inmates maybe isolated),
- 6) the composition of the inmate population,
- 7) the number and placement of supervisory staff,
- 8) institution programs occurring on a particular shift,
- 9) any applicable State or local laws, regulations, or standards,
- 10) the prevalence of substantiated and unsubstantiated incidents of sexual abuse,
- 11) any other relevant factors.

The warden was interviewed and stated that the facility supervisory and leadership consider the above areas when reviewing the staffing plan.

The PCM stated they are involved in the development, review, and amendment of the staffing plan.

Documents uploaded and reviewed in the PAQ, onsite observations of supervision practices, and interviews with the warden, the facility has not had to deviate from the staffing plan.

Interviews with security and non-security staff, and onsite observation revealed staff are consistently making security rounds.

Security and non-security staff are knowledgeable and understand their role to prevent sexual abuse and harassment. Informal conversations with inmates who stated staff are consistently moving throughout the unit, at random times, and never know when staff will be in the area. Inmates expressed that they feel safe on the facility.

When line of sight is not always possible, the facility has placed cameras, mirrors, or security makes frequent rounds to these areas. The cameras are monitored by facility staff and leadership staff.

(c) The PREA Coordinator stated they participate in annual staffing reviews to determine if adjustments are needed to the staffing plan, the facilities deployment of video monitoring systems or other monitoring technologies, and the resources the facility has available to commit to ensure adherence to the staffing plan.

	<p>(d) The facility/agency has implemented Policy OP-030601 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 during the day and night shifts. The policy prohibits staff from alerting other staff members that the supervisory rounds are occurring unless such announcement is related to the legitimate operational functions of the facility.</p> <p>Reviews of the PREA unannounced rounds documented in logbooks and verified during interviews with staff responsible for conducting these rounds, revealed the facility is compliant.</p> <p>Based on a review of agency policy, and informal and formal interviews with staff, the Auditor has determined that the facility has exceeded this 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>Standard 115.14 - Youthful inmates</p> <p>Per the PAQ, the facility does not have youthful inmates (inmates &lt;18 years old).</p> <p>Based on the evidence presented, the facility is in compliance with this standard.</p>

<b>115.15</b>	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.15 - Limits to cross-gender viewing and searches</p> <p>(a) The facility does not conduct cross-gender strip searches or cross-gender visual body cavity searches except in exigent circumstances or when performed by medical practitioners, as evidenced by the PAQ, policy OP-040110 and observations made during the site review. PO-030601 states a person of the same gender as the inmate will be available to perform gender specific tasks such as strip and visual body cavity searches as defined in OP-040110 "Search and Seizure Standards.</p> <p>Based on interviews with the PCM and the information provided in the PAQ, there have not been any cross-gender strip searches in the last twelve months. During the onsite review, search areas were observed, and privacy screens were in place to prevent cross-gender viewing. These areas still allowed for adequate supervision of</p>

opposite-gender supervisory staff.

(b) Based on the information provided in the PAQ and the site observation, the facility does not house female inmates.

(c) Per policy OP-040110, all cross-gender strip searches and cross-gender visual body cavity searches shall be documented.

(d) PO-030601 requires inmates to shower, perform bodily functions, and change cloths without nonmedical staff of the opposite gender viewing their breast, buttocks, genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. The processes were observed during the site review.

Policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit. Site review observations indicate that the facility takes extra precautions to reduce the risk of incidental opposite gender viewing. Staff announce themselves when entering the housing area, there is clear signage posted to remind staff to announce themselves, staff of the opposite gender sign a logbook when entering the housing areas. Interviews with inmate and male correctional staff stated that male officers will also announce the presence of a female staff member entering the housing area.

Most random inmates interviewed stated that female staff announce themselves when coming into the housing area. They all stated that they are required to be in full dress unless they are in the shower or restroom out of the view of female staff.

All random staff members interviewed stated that female staff announce themselves prior to entering housing areas. During the site review observation was made that female staff announced their presence when entering housing areas. It was observed that the restrooms and showers in the housing areas had privacy curtains or doors that prevented cross-gender viewing.

A review of the video surveillance system in the housing and search areas determined that there were no areas where inmates' privacy was compromised.

(e) Per OP-030601, the facility shall not search or physically examine transgender or intersex inmates for the sole purpose of determining the inmate's genital status. If the genital status of the inmate is unknown, the determination is made through conversations with the inmate, review of medical records, and if necessary, by a broader medical examination conducted in a private setting by a medical practitioner. Information was verified during random staff interviews and an interview with transgender inmates, who stated they have not been examined to determine their genital status. They stated they are treated the same as other inmates who are not transgender and feel safe.

(f) The agency trains security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs, as evidenced by a review of the training curriculum and staff training

	<p>attendance rosters and verified through interviews with random staff.</p> <p>The majority of random staff interviewed said they received cross-gender pat-search training during in-service.</p> <p>Based on a review of agency policy, training curriculum, signed training rosters, and informal and formal interviews with staff, the Auditor has determined that the facility has exceeded 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> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.16 - Inmates with disabilities and inmates who are limited English proficient</p> <p>(a)(b) The agency takes appropriate steps to ensure 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. The agency ensures written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities, including inmates who have intellectual disabilities, limited reading skills, or who are blind or have low vision. A review of OP-030601, In-service training, new arrival documentation, protocol testing, and observations made during the site were conducted. Interviews with inmates with disabilities or who are limited English proficient verified this practice.</p> <p>During Warden's interview, they indicated that the agency has established procedures to provide inmates with disabilities and inmates who are limited English proficient equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and harassment. The agency provides interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary, as outlined in policy OP-030601, the inmate handbook in Spanish, Spanish acknowledgement form, Oklahoma DOC interpreter list, observations made during the site review of postings in English and Spanish, and during interviews with inmates with disabilities or who are limited English proficient.</p> <p>Per Interviews with random staff and inmates with disabilities or who are limited English proficient stated that inmates can access an interpreter using the telephones and tablets via Securus Technologies. The agency does not rely on inmate interpreters, inmate readers, or other types of inmate's assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could</p>



	<p>compromise the inmate's safety, the performance of first-response or the investigation of the inmate's allegation.</p> <p>(c) OP-030601 requires all inmate education to be provided to inmates by staff. No inmate interpreters shall be used except in exigent circumstances. Information provided the facility, interviews with staff, interviews with inmates, and informal conversations with staff and inmates, there have been no instances in the past twelve months where inmate interpreters, readers, or other types of inmate assistance has been used.</p> <p>Based on a review of agency policy, and informal and formal interviews with staff, the Auditor has determined that the facility has exceeded this standard.</p>
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<b>115.17</b>	<b>Hiring and promotion decisions</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Standard 115.17 - Hiring and promotion decisions</p> <p>Per OP-030601, the agency does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor who may have contact with inmates, who</p> <p>(1) has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution.</p> <p>(2) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or of the victim did not consent or was unable to consent or refuse; or</p> <p>(3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a) (2) of this section.</p> <p>A review of randomly selected employee records ensured the newest hired, tenured employees, and those recently promoted were included to ensure a breadth of faculty staff. Each record contained proper criminal record background checks and questions regarding past conduct were asked and answered.</p> <p>(b) OP-110235 states the appointing authority will consider any incidents of sexual harassment in determining whether to hire or promote any applicant/employee or prior to enlisting the services of any contractor who may have contact with an inmate and was verified through interviews with HR staff. Interviews with Human Resource staff confirmed that they consider any incidents of sexual harassment in determining whether to hire or promote any applicant/employee.</p> <p>(c) OP-110235 requires that prior to hiring any new employees who may have contact</p>

with inmates, it (a) conducts criminal background record checks, and (b) consistent with federal, state, and local law, makes the 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. During an interview with HR staff, it was confirmed that the agency performs criminal background checks and considers pertinent civil or administrative adjudications for all newly hired employees who may have contact with inmates, and employees who are considered for promotions, who may have contact with inmates. Per the PAQ, interviews with the Warden and Human Resource staff, the facility does not contract with any contractors currently, however, the facility does conduct background records checks on all volunteers and contractors.

(d) OP-110235 states criminal background record checks must be completed prior to enlisting the services of any contractor who may have contact with inmates.

(e) OP-110210 requires a review of background checks every five years of current employees. The agency completes background checks every five years for employees who may have contact with inmates. The agency conducts criminal background checks using the state rap-back system under the National Background Check Program that instantly notifies the agency of any new criminal history record against an employee since the last criminal history background check is complete. All applicants and employees are asked about prior misconduct that may have contact with inmates directly in written applications and during interviews for hiring or promotions, and any interviews or written self-evaluations conducted as part of reviews of current employees. The agency also imposes upon employees a continuing affirmative duty to disclose any such misconduct.

(f)(g) A review of random staff records observed that staff are asked directly about previous misconduct described in Paragraph (a) of this section in written applications for hiring or promotions.

(h) Human Resource staff stated that the facility imposes an affirmative duty to disclose any such previous misconduct. Per OP-110210, material omission regarding such misconduct, or the provision of materially false information, are grounds for termination, discontinuation of the hiring process.

The agency provides 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.

Based on a review of agency policy, and informal and formal interviews with staff, the Auditor has determined that the facility has exceeded this standard.

<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>

	<p>Standard 115.18 - Upgrades to facilities and technologies</p> <p>(a)(b) Per the information provided in the PAQ and during interviews with the PCM and the Warden, the facility has not acquired a new facility or made a substantial expansion since the last PREA audit.</p> <p>When installing/updating video monitoring, electronic surveillance system, or other monitoring, the agency takes into consideration how such technology may enhance the agency's ability to protect inmates from sexual abuse.</p> <p>Based on a review of agency policy, additions to maintenance cameras to prevent blind spots, and informal and formal interviews with staff, the Auditor has determined that the facility has exceeded this standard.</p>
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<b>115.21</b>	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.21 - Evidence protocol and forensic medical examinations</p> <p>(a) All Allegations of sexual assault and sexual harassment are referred to the Office of Inspector General (OIG). The OIG Agent in Charge (AIC) will make the determination on whether an investigator will respond to initiate a criminal investigation, an administrative investigation, or if the investigation will be returned to the facility for its own investigation.</p> <p>The agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions, as evidenced by a review of "A National Protocol for Sexual Assault Medical Forensic Examinations" manual and interviews with random staff. Based on interviews with the PCM and OIG investigators, the agency and facility follow a uniform evidence protocol.</p> <p>The Auditor interviewed randomly selected employees, and most understood the agency's protocol for obtaining usable physical evidence if an inmate alleges sexual abuse. The majority knew that OIG is responsible for conducting criminal investigations, others stated the Deputy would conduct the investigations. All knew that the facility played at least some role in conducting administrative investigations.</p> <p>(b) Based on a review of the agency's policy, it is developmentally appropriate for the youth, although HMCC does not hold youthful offenders. The same review revealed that the protocol was adapted from or otherwise based on the most recent edition of the DOJ'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, as verified by a review of the evidence protocol.</p>

(c) Agency policy states that all inmates who experience sexual abuse have access to forensic medical examinations at an outside facility, without financial cost, where evidentiary or medically appropriate. The facility has an MOU with the Crisis Control Center. The facility also has an MOU with a SANE Nurse. While interviewing the SANE Nurse, she stated she is the only SANE nurse for the HMCC and if services are needed and she is not available, staff will take the inmate to the nearest hospital with a SANE. The facility contacts SANE Nurse directly, when services are needed. She stated she covers five counties and will go to whatever hospital she is needed at.

OP-140118 states that alleged victims of non-consensual contact will be provided unimpeded access to emergency medical treatment of crisis intervention services and referred to a local community provider for any additional treatment, gathering of evidence and forensic examination.

This same policy sections says that treatment services will be provided to the victim without any co-pay and regardless of whether the victim names the abuser or cooperates with any investigation arising from the reported incident.

The Auditor interviewed Medical Staff who indicated that when an inmate is sent for a forensic exam, the facility will obtain written and/or electronic medical records from the treating facility and document its efforts to provide a SANE examination. In the past 12 months the facility reported no forensic examinations as a result of an allegation of sexual abuse.

(d) HMCC has an active MOU with the Crisis Control Center, who provides victim advocate services to victims who have alleged sexual abuse. When those referrals are made, the facility documents them in writing. This was confirmed in the Auditor's interview with the PCM. The PCM also said in his interview that in the event a representative from the crisis center was not available, the facility would provide a qualified agency staff member, which typically would be a case manager.

The Auditor observed the Sexual Abuse Help is Available poster in each of the housing areas, which provides methods to contact the crisis center.

(e)(h) OP-030601 states that with the alleged victim's consent, an approved rape advocate and/or case manager may sit in on investigative interviews. This was confirmed in interviews with the PCM by the Auditor. The Auditor confirmed that advocates and case managers have been screened for appropriateness to serve in the role and have received education concerning sexual assault and forensic examination issue.

(f) As notated in the PAQ, the agency/facility is responsible for conducting criminal and administrative sexual abuse investigations.

(g) As notated in the PAQ, the agency/facility is responsible for conducting criminal and administrative sexual abuse investigations.

(h) The agency always makes a victim advocate from a rape crisis center available to victims as evidenced by the questionnaire.

	<p>Based on a review of agency and facility policies, the Auditor’s observations, along with interviews with Random Staff, the PCM, OIG investigators, the SANE nurse, facility and medical staff, the Auditor has determined that the facility is in compliance with this standard.</p>
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<b>115.22</b>	<b>Policies to ensure referrals of allegations for investigations</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Standard 115.22 - Policies to ensure referrals of allegations for investigations</p> <p>(a) OP-030601 states that the agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including inmate-on-inmate sexual abuse and staff sexual abuse).</p> <p>In the past 12 months, the facility reported two allegations of sexual abuse and sexual harassment were received. Both cases were referred to the OIG and resulted in an administrative investigation.</p> <p>Standard subsection 115.22 (c) is not applicable to this facility.</p> <p>The Auditor interviewed the Warden who stated that they ensure administrative or criminal investigations are completed for all allegations of sexual abuse and sexual harassment. They stated that all allegations are referred to the OIG for review. The Agent in Charge (AIC) will determine if an immediate response is required. The AIC will then determine if a criminal investigation is warranted. If not, the AIC will determine if the OIG conducts an administrative investigation (as in cases where the alleged perpetrator is a staff member), or if it will be returned, a trained facility investigator would conduct the investigation.</p> <p>(b) OP-030601 states that all incidences of sexual abuse/assault or harassment, including third party and anonymous reports, will be reported to the OIG. The Facility head/unit head will ensure immediate verbal notification to the OIG or the OIG duty officer.</p> <p>The Auditor reviewed the agency website and found that the ODOC makes information regarding the process readily available Prison Rape Elimination Act (oklahoma.gov)</p> <p>The Auditor reviewed both investigative reports, and the referrals to OIG were present in each case.</p> <p>The Auditor interviewed an investigator from OIG and one facility investigator. Each state that the agency and facility have policy that require allegations of sexual abuse or sexual harassment be referred for investigation to the OIG.</p> <p>Based on a review of agency policy, and informal and formal interviews with staff, the Auditor has determined that the facility has exceeded this standard.</p>

<b>115.31</b>	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.31 - Employee training</p> <p>(a) OP-030601 states that all staff who may have contact with inmates shall receive training to emphasize the zero tolerance of sexual abuse/harassment, aid in the prevention of sexual abuse/harassment of inmates and promote awareness of the serious impact of sexual victimization within the correctional setting. Training related to prevention, detection, reporting, and response of sexual abuse and harassment shall be a part of orientation/pre-service training in accordance with OP-100101 entitled "Training and Staff Development."</p> <p>OP-030601 also states that the agency trains all employees who may have contact with inmates on the following:</p> <ul style="list-style-type: none"> <li>· the agency's zero tolerance policy on sexual abuse and sexual harassment.</li> <li>· the right of inmates to be free from sexual abuse and sexual harassment.</li> <li>· the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment.</li> <li>· the dynamics of sexual abuse and sexual harassment in confinement.</li> <li>· the common reactions of sexual abuse and sexual harassment victims.</li> <li>· how to detect and respond to signs of threatened and actual sexual abuse.</li> <li>· how to avoid inappropriate relationships with inmates.</li> <li>· how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender-nonconforming inmates.</li> <li>· how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.</li> </ul> <p>The Auditor interviewed randomly selected staff members, and each demonstrated a complete understanding of the bulleted items above along with their responsibility regarding prevention, detection, reporting, and response in accordance with agency policy.</p> <p>(b) HMCC houses only male inmates and training provided to staff is tailored to that population, which was confirmed by the Auditor's review of the training curriculum. Anytime employees are reassigned from another facility, they receive in-service training to ensure they are familiar with the management of inmates at the facility. The Auditor confirmed this a review of randomly selected employee records, which all demonstrated completion of the training.</p> <p>(c)(d) Based on a review of training records, along with informal and formal conversations with staff, PREA training is received by all employees at least on an annual basis, if not more. The Auditor interviewed randomly selected staff members, and all said that PREA is a continual topic at training and at the forefront of the operation. This was also confirmed by the Auditor in a review of employee training</p>

	<p>records.</p> <p>Each annual training roster contains the signature of the employee affirming that the PREA training they have received has been understood.</p> <p>Based on a review of agency policy, the PREA training curriculum, and informal and formal interviews with staff, the Auditor has determined that the facility has exceeded this standard.</p>
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<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.32 - Volunteer and contractor training</p> <p>The Auditor reviewed the training curriculum for volunteers and contractors and confirmed that volunteers and contractors who have contact with inmates are trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response.</p> <p>The facility reported that it has trained 79 volunteers and contractors.</p> <p>The Auditor was required to complete the training for volunteers before entering the facility for the first time. A binder containing the curriculum is in the central control building. The Auditor reviewed the training as is required for all volunteers entering the facility and signed a roster acknowledging that the material was reviewed and understood.</p> <p>The Auditor also interviewed a contractor, who confirmed their training.</p> <p>(b)(c) Through review of the training curriculum, the Auditor determined that the level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates. The training also emphasizes the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report such incidents.</p> <p>The auditor confirmed through interviews with the contractor that they received educated on the zero-tolerance policy, how to make reports, along with prevention, detection and response.</p> <p>The Auditor reviewed training rosters for contractors and volunteers which confirmed their participation, along with signatures acknowledging their understanding of the material.</p> <p>Based on a review of agency policy, the PREA training curriculum, this Auditor was required to complete the training onsite, and interviews with volunteers, the Auditor has determined that the facility has exceeded this standard.</p>

<b>115.33</b>	<b>Inmate education</b>
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**Auditor Overall Determination:** Exceeds Standard

**Auditor Discussion**

Standard 115.33 - Inmate education

(a)(b) OP-030601 states that during assessment and reception, all new inmates will receive verbal and written information about sexual abuse and harassment. This information will address the agency and facility zero tolerance standard, prevention/intervention, self-protection, how to report acts or suspicions of sexual abuse, assaults or harassment by inmates or staff to include reporting utilizing the inmate PREA Hotline (073). Inmate phones shall have instructions for using the PREA Hotline posted in a conspicuous location on or near the phones.

In the past 12 months the facility reported a total of 671 inmates were received at intake and that all 671 were provided with this information.

During the facility tour, the Auditor observed signage in all housing areas and other conspicuous places in the facility on how to report sexual abuse, and how to obtain advocacy services through the rape crisis center. Additionally, each housing area contains a large, brightly colored "073" PREA Hotline phone number on the wall. The 073-telephone number goes directly to the OIG, it is not monitored, and it is not recorded. The PREA Hotline can be reached without self-identification.

Each inmate is provided with a Securus Technologies tablet, with a telephone application, so inmates can make a more private notification to OIG, opposed to using the wall phone. The Auditor tested the wall phones and had an inmate test the tablet function, successfully reaching the OIG through the 073 number.

Additionally, the Securus tablets contain an FYI application, that includes specific information on PREA in English and in Spanish.

The Auditor interviewed a member of intake staff who stated that every inmate is provided with an information packet that includes specific information regarding PREA. The intake officer ensures that the information is understood, and if it is not, arranges for means (interpreter, reader) so that the inmate can understand the information.

The Auditor interviewed randomly selected inmates. All said they received the information above at intake/orientation.

The Auditor also conducted informal conversations with inmates and staff. All confirmed the distribution of PREA materials at intake, and every inmate was aware of the 073 PREA Hotline number to make reports.

In the past 12 months the facility reported that all 612 inmates admitted at intake received comprehensive education on their rights to be free from both sexual abuse and sexual harassment within 30 days of intake.

The education is presented in person and with a video in combination with a broader orientation process.

The Auditor interviewed an intake staff member who stated that every inmate admitted to the facility receives comprehensive education on PREA in an in-person,



classroom format, along with a PREA-specific video.

The Auditor interviewed randomly selected inmates; all of whom said they had received the comprehensive PREA training within the first 30 days of having arrived at the facility. Each was able to articulate portions of the training, including their right to be free from both sexual abuse and sexual harassment, how to report sexual abuse or sexual harassment, their right not to be punished for reporting sexual abuse or sexual harassment.

(c) OP-030601 states that upon transfer to a different facility, the inmate will receive orientation in regard to PREA policies and procedures which may differ from a previous facility. Community centers shall provide refresher information to transferred inmates.

The Auditor interviewed an intake staff member who stated that all inmates coming to HMCC come from other ODOC facilities and that they do not take direct admissions. They reiterated that all inmates received comprehensive education within 30 days of intake.

(d)(e) OP-030601 states that every inmate will receive a written copy of the agency's orientation material in formats or through methods to ensure effective communication. Inmates whose primary language is not English will normally be provided a copy or translation of the orientation material in their own language. If literacy problems, intellectual disabilities/disabilities (visual/hearing impairments) exist, the inmate will be assisted in understanding the material.

(f)(g) During the onsite audit, the Auditor reviewed training rosters for the comprehensive education provided to the inmates and observed that inmates sign the orientation/education roster acknowledging that they participated and understood the material presented.

During the facility tour, the Auditor observed that the facility ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, inmate handbooks, and other written formats. Signage is posted in housing areas, work areas, education areas, and other conspicuous areas of the facility. They include information in English and Spanish and provide resources for the rape crisis center and PREA Hotline.

Additionally, each of the tablet inmates are provided contain written information in English and Spanish, such as the inmate handbook and detailed PREA information. During the facility tour, the Auditor had inmates demonstrate how to access those resources on the tablet.

Based on a review of agency policy, observations and systems testing by the Auditor, along with interviews of intake staff and inmates, the Auditor has determined that the facility has exceeded this standard.

	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Standard 115.34 - Specialized training: Investigations</p> <p>(a)(b)(c) OP-030601 states that specialized training is provided for employees who may respond, as part of their job duties, to reported incidents of sexual assault. This training may include, but is not limited to crime scene management, elimination of contamination in accordance with OP-140125 entitled “Bloodborne Pathogen Exposure Control Program,” evidence collection protocol and crisis intervention.</p> <p>The agency conducts both criminal and administrative investigations. Criminal investigations are conducted by agents of the Office of Inspector General, who are sworn peace officers in the state of Oklahoma. Most administrative investigations are conducted by facility-level investigators. All of the investigators attend a training course provided by the NIC titled Investigating Sexual abuse in a Confinement Setting.</p> <p>The Auditor interviewed one agent from the OIG and one facility investigator. Both stated that they had successfully completed the training course stated above and said the following topics were covered:</p> <ul style="list-style-type: none"> <li>· Techniques for interviewing sexual abuse victims</li> <li>· Proper use of Miranda and Garrity warnings</li> <li>· Sexual abuse evidence collection in confinement settings</li> <li>· The criteria and evidence required to substantiate a case for administrative or prosecution referral</li> </ul> <p>During the investigator interviews, the Auditor found both to be extremely experienced and knowledgeable about their investigative responsibilities as it related to sexual abuse and sexual harassment allegations. Each demonstrated complete command of investigative techniques, appropriate uses of Garrity and Miranda warnings, and superior knowledge on evidence collection. The Auditor reviewed the training records of agency investigators and confirmed that all had successfully completed the specialized NIC training.</p> <p>(d) The Auditor is not required to audit this provision.</p> <p>Based on a review of agency policy, training curriculum, interviews with investigators, and a review of training records, the Auditor has determined that the facility has exceeded this standard.</p>
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<b>115.35</b>	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>

	<p>Standard 115.35 - Specialized training: Medical and mental health care (a)(b)(c)(d) OP-030601 states that Mental Health and medical staff will be provided training to detect and assess signs of sexual abuse and/or predation, preserve evidence of sexual abuse, respond to sexual assault victims, and knowledge of department procedures in regard to the PREA reporting process. Specialized training will be conducted upon new hire and annually. Documentation shall be retained in the employee's file.</p> <p>The facility employs 9 medical and mental health staff and based on a review of training logs; the Auditor was able to determine that all 9 had received the specialized training required.</p> <p>The Auditor interviewed one Medical and one Mental Health Staff member. They stated they had received the specialized and the training mandated for employees under §115.31. They were thoroughly knowledgeable regarding their responsibilities of their roles in treating inmates who have alleged sexual abuse or sexual harassment.</p> <p>The Auditor reviewed facility training records and confirmed the staff member interviewed had successfully completed the training mandated for employees. Agency medical staff at this facility do not conduct forensic medical exams.</p> <p>Based on a review of agency policy and interviews, the Auditor has determined that the facility has exceeded this standard.</p>
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<b>115.41</b>	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.41 - Screening for risk of victimization and abusiveness</p> <p>(a)(b)(c) OP-030601 states that all inmates upon admission to a facility or transfer to another facility shall be screened for risk of sexual victimization or sexual abusiveness toward other inmates.</p> <p>During the onsite visit, the Auditor learned that each inmate who arrives at the facility completes a self-report form prior to being housed. The intake staff member interviewed said that referrals to Medical and Mental Health are made in accordance with PREA standards. The Auditor interviewed an intake staff member and a unit manager and each stated that inmates are screened upon admission to the facility, or transfer to another facility for risk of sexual victimization or sexual abusiveness toward other inmates. Within 72 hours of arrival at the facility, a unit manager will formally interview each inmate using an objective screening instrument to confirm their responses and elicit any additional information.</p> <p>During the past 12 months, all 664 inmates entering the facility whose length of stay</p>

was for 72 hours or more had been screened within 72 hours of entry.

The Auditor reviewed the records of the randomly selected inmates and confirmed that each had completed the self-report form, and each had been formally screened by a unit manager within 72 hours of entry into the facility.

During the Auditor's interview with randomly selected inmates, they stated they had been asked questions about whether they had been sexually abused, identified as gay or lesbian, or bisexual, and whether they might be in danger of sexual abuse at the facility. The two who did not answer affirmatively had been at the facility for more than two years and did not specifically remember if they had been asked those questions.

The Auditor also conducted informal conversations with staff members and inmates, all of whom confirmed the process as stated above. Although no intakes occurred during the Auditor's onsite visit, the intake staff member demonstrated how the process is conducted. Additionally, the unit manager stated that each of the inmate screening interviews takes place in a private area.

(d)(e) The Auditor reviewed the objective screening instrument, called a Cell-Assessment Form, and it assesses the following:

- Whether the inmate has a mental, physical, or developmental disability
- The age of the inmate
- The physical build of the inmate
- Whether the inmate has been previously incarcerated
- Whether the inmate's criminal history is exclusively non-violent
- Whether the inmate has prior convictions for sex offenses against an adult or child
- Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming
- Whether the inmate has previously experienced sexual victimization
- The inmate's own perception of vulnerability
- Whether the inmate is detained solely for civil immigration purposes

The Auditor interviewed an intake staff member who identified each of the areas above considered in the screening instrument. The staff member also reiterated that inmates initially complete the self-report form to immediately identify potential concerns, and then within 72 hours, the inmate will meet face-to-face with the unit manager to have a full screening completed.

(f) OP-030102 states that the facility reassesses each inmate's risk of victimization or abusiveness within a set time period, not to exceed 30 days after the inmate's arrival at the facility, based upon any additional, relevant information received by the facility since the intake screening.

During the past 12 months all 612 inmates whose length of stay in the facility was for 30 days or more and who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake. This was also confirmed in an interview with intake staff and unit managers.

	<p>The Auditor interviewed randomly selected inmates, and some stated they had been asked the same types of questions within the first 30 days after arrival at the facility.</p> <p>The Auditor also reviewed the records of the inmates, and all contained the initial assessment along with the reassessments.</p> <p>(g) OP-030102 states that an inmate's risk level be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. This was confirmed through interviews by the Auditor with intake staff and the randomly selected inmates.</p> <p>The Auditor reviewed records of inmates who had reported sexual abuse and confirmed that they had been reassessed.</p> <p>(h) OP-030601 prohibits disciplining inmates for refusing to answer (or for not disclosing complete information related to) questions regarding: (a) whether or not the inmate has a mental, physical, or developmental disability; (b) whether or not the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; (c) whether or not the inmate has previously experienced sexual victimization; and (d) the inmate's own perception of vulnerability.</p> <p>The Auditor interviewed a unit manager who stated that inmates are not disciplined in any manner for refusing to answer or disclose the information stated above.</p> <p>(i) The Auditor interviewed the PCM, unit manager, and intake staff, all of whom stated that only those personnel who have a need-to-know sensitive information are allowed access to that information.</p> <p>The Auditor observed that physical inmate records are located in locked filing cabinets in offices not accessed by staff members, other than those who work in that area and are responsible for the maintenance of those records. Unit managers, who conduct the screenings via computer, access the system through password-protected means, which are not available to other staff members.</p> <p>The Auditor also conducted informal conversations with staff who said that only personnel who are on a need-to-know basis have access to sensitive information.</p> <p>Based on a review of agency policy and interviews, the Auditor has determined that the facility is in compliance with this standard.</p>
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<b>115.42</b>	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.42 - Use of screening information</p> <p>(a)(b) OP-030601 states that the facility uses information from the risk screening</p>

required by §115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.

The Auditor interviewed the PCM and staff responsible for risk screening, who confirmed that individual determinations are made to determine housing, bed, work, education and programming assignments to separate high risk inmates of sexual victimization from those at high risk of being sexually abusive.

The Auditor was provided with documentation that demonstrated that risk-based housing decisions were indeed being made.

(c)(d)(e)(f)(g) OP-030601 states that in deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, the facility shall consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems.

The Auditor interviewed the PCM who said that when determining housing assignments for transgender or intersex inmates, they consider whether the placement ensures the inmate's health and safety and whether the placement presents management or security problems.

The PCM also said that any programming assignments for transgender or intersex inmates would be reassessed at least twice each year to review any threats to safety of the inmate. This was also confirmed in an interview with a unit manager. Each also stated that the inmate's own view of their safety would be given serious consideration.

The PCM and unit manager also stated that transgender and intersex inmates are afforded the opportunity to shower separately from other inmates.

They also said that the facility does not segregate lesbian, gay, transgender, bisexual, or intersex inmates into dedicated facilities, units, or wings based solely on their identified status.

The Auditor also interviewed the A/PC who stated that the agency never places lesbian, gay, transgender, bisexual, or intersex inmates in designated housing areas based on their sexual orientation.

During the onsite audit, the Auditor toured each housing area, which provides individual showers with shower curtains, affording transgender, or intersex inmates to shower separately from other inmates.

Based on a review of agency policy and interviews, the Auditor has determined that the facility is in compliance with this standard.

<b>115.43</b>	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.43 - Protective Custody</p> <p>(a) OP-030601 states that inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for no more than 24 hours while completing the assessment.</p> <p>The Auditor interviewed the Warden who confirmed this policy.</p> <p>During the past 12 months the facility reported that no inmates had been placed in involuntary segregated housing due to a high risk of sexual victimization.</p> <p>(b)(c)(d) OP-030601 says that inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education or work opportunities the facility shall document:</p> <ol style="list-style-type: none"> <li>1. The opportunities that have been limited</li> <li>2. The duration of limitation</li> <li>3. The reasons for such limitations</li> </ol> <p>During the past 12 months the facility reported that no inmates had been placed in involuntary segregated housing due to a high risk of sexual victimization, therefore there were no inmate interviews conducted.</p> <p>The Auditor interviewed Staff who Supervise Inmates in Segregated Housing, and they stated that if an inmate is placed into segregated housing as stated above, they would still have access to programs, education and work opportunities to the extent possible and that the facility would document if the opportunities had been limited, for how long, and the reason for the limitations. The staff member also stated that no inmate would be housed beyond the point when alternative means of separation could be identified. The Warden also concurred with this in her interview with the Auditor.</p> <p>During the past 12 months the facility reported that no inmates had been placed in involuntary segregated housing due to a high risk of sexual victimization.</p> <p>(e) OP-030601 states that every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population. This was confirmed by the Auditor in an interview with Staff who Supervise Inmates in Segregated Housing.</p>

	Based on a review of agency policy and interviews with the Warden and Staff who Supervise Inmates in Segregated Housing, the Auditor has determined that the facility is in compliance with this standard.
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<b>115.51</b>	<b>Inmate reporting</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p><b>Auditor Discussion</b></p> <p>Standard 115.51 - Inmate reporting</p> <p>(a)(b) OP-030601 establishes multiple internal ways for inmates to report privately to agency officials about: (a) sexual abuse or sexual harassment; (b) retaliation by other inmates or staff for reporting sexual abuse and sexual harassment; and (c) staff neglect or violation of responsibilities that may have contributed to such incidents.</p> <p>This policy states reporting of sexual abuse/harassment; retaliation by other inmates or staff for reporting sexual abuse or harassment and staff neglect or violation of responsibilities that may have contributed to such incidents. This will include information that the inmate victim has the option to report the incident to a designated staff member or any other staff. Other reporting methods include facility/unit head, third party contacts, PREA Hotline, request to staff, anonymous, office of Inspector General or the Oklahoma State Bureau of Investigations.</p> <p>The Auditor interviewed randomly selected staff members, all of whom were able to name multiple methods inmates have to privately report sexual abuse and sexual harassment.</p> <p>The Auditor also interviewed randomly selected inmates. All were able to provide at least two methods to privately report sexual abuse or sexual harassment. All specifically stated they can call 073 on any inmate telephone, or through the phone application on their Securus tablet. The Auditor tested the phone system and was able to easily reach the OIG through the 073-phone number. The Auditor also had three inmates demonstrate the phone app on the tablet, and each were easily able to show how the system works and the ease of reaching the OIG through 073.</p> <p>During the onsite audit the Auditor observed signage in all housing locations, and many other conspicuous locations, which provided addresses for the Oklahoma State Bureau of Investigations and a rape crisis center.</p> <p>The Auditor also conducted informal conversations with staff and inmates, all of whom knew multiple ways of making private reports. It was clear that reporting mechanisms were common knowledge among all staff and inmates.</p> <p>The facility does not house inmates solely for civil immigration purposes.</p> <p>(c)(d) OP-030601 states that staff, volunteers or contractors shall accept reports</p>



	<p>made verbally, anonymously, in writing and from third parties. Verbal reports shall be documented in an "Incident/Staff Report (OP-050109, Attachment A) in Section-03 Facility Operations OP-030601 Page: 20 Effective Date: 12/01/2021 accordance with OP-050109 entitled "Reporting of Incidents."</p> <p>The Auditor interviewed randomly selected staff members who all said that they must accept, and document all reports of sexual abuse and sexual harassment. Each said these reports must be documented in writing through official agency reporting mechanisms. The staff members were also asked by the Auditor how they can privately make a report of inmate sexual abuse or sexual harassment. Most said they would contact either the OIG, OSBI, or both.</p> <p>The Auditor also interviewed randomly selected inmates who stated that they can make reports verbally, or in writing. Most said they could notify a family member and have them make a report.</p> <p>Based on a review of agency policy, and interviews with randomly selected staff and inmates, the Auditor has determined that the facility has exceeded this standard.</p>
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<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Standard 115.52 - Exhaustion of administrative remedies</p> <p>(a)(b)(c) OP-090124 states that grievances may be submitted directly to the reviewing authority without informal resolution process when the complaint is of a sensitive nature or when substantial risk of personal injury, sexual assault, or other irreparable harm exists. The inmate/offender must use the "Inmate/Offender Grievance" form.</p> <p>(d) OP-090124 also says that inmates may submit a grievance regarding an allegation of sexual abuse at any time, regardless of when the incident is alleged to have occurred, and that they are not required to use an informal grievance process, or otherwise to attempt to resolve with staff any alleged incident of sexual abuse. This same policy allows an inmate to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. The policy also requires that an inmate grievance alleging sexual abuse not be referred to the staff member who is the subject of the complaint. OP-090124 requires that a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 90 days of the filing of the grievance.</p> <p>This same policy states that the agency will always notify an inmate in writing when the agency files for an extension, including notice of the date by which a decision will</p>

be made.

The Auditor reviewed the investigative file related to this inmate's report and confirmed that notification was made within 90 days.

(e) OP-090124 permits third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of inmates. OP-090124 requires that if an inmate declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the inmate's decision to decline.

The facility received no grievances alleging sexual abuse filed by inmates in the past 12 months in which the inmate declined third-party assistance.

During the onsite audit, the Auditor observed signage and posters in all housing areas and other conspicuous locations containing PREA information, methods of reporting, access to outside victim services and the manner in which third-party reports could be filed.

The Auditor also visited the agency's website and tested the third-party reporting methods and tested the email, and telephonic reporting systems, receiving prompt responses in each case.

(f) OP-090124 states that upon receipt of a grievance marked "emergency" or "sensitive," the reviewing authority will have 24 hours to determine if it is in fact an emergency or sensitive grievance. If so, an expedited review will be conducted, and a response provided to the inmate/offender within 48 hours of receipt.

The facility reported that in the past 12 months no emergency grievances were filed related to sexual abuse. OP-090124 says that grievances alleging substantial risk of imminent sexual abuse require that a decision be issued within 48 hours. The facility reported no such instances in the previous 12 months.

(g) OP-090124 limits its ability to discipline an inmate for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the inmate filed the grievance in bad faith.

The facility reported no inmate grievances alleging sexual abuse that resulted in disciplinary action by the agency against the inmate for having filed the grievance in bad faith.

Based on a review of agency policy and a test of third-party reporting systems, the Auditor has determined that the facility is in compliance with this standard.

**115.53**

**Inmate access to outside confidential support services**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Standard 115.53 - Inmate access to outside confidential support services

(a) OP-030601 states that the facility shall maintain or attempt to enter into a memorandum of understanding (MOU) or other agreements with community service providers who are able to provide inmates with confidential emotional support services related to sexual abuse. If an MOU/agreement is entered into; the facility will provide inmates with access to the contact information for the community service provider as outlined in the MOU/agreement. The inmate handbook (available to all inmates electronically through a provided Securus tablet) and signage throughout the facility provides inmates with access to community providers (Crisis Control Center) by giving inmates mailing addresses and telephone numbers for local victim advocacy or rape crisis organizations.

The facility provides inmates with toll free numbers and addresses which enable reasonable communication between inmates and these organizations. The use of the Securus tablets allows inmates to make contact at any time.

The Auditor interviewed randomly selected inmates. Most were able to name at least two services available to them. Most were able to articulate the types of services available, stating that contact information is posted in the housing area and accessible via the tablets. Some inmates were not sure what services were available but was aware that the information was posted or on their tablet.

The Auditor was able to test the available services, confirm that the Crisis Control Center serves the interests of inmates at the facility, and are available to assist when necessary.

(b) OP-030601 requires that it informs inmates, prior to giving them access to outside support services, the extent to which such communications will be monitored, and the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply to disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant federal, state, or local law.

The Auditor interviewed randomly selected inmates, most stated that conversations are "private." Most were not aware of when the conversations would no longer be private and the mandatory reporting laws.

(c) The facility provided the Auditor with a copy of its MOU with Crisis Control Center, who has agreed to provide emotional services related to sexual abuse to inmates at the facility.

Based on a review of agency policy, a test of available resources, and interviews with inmates, the Auditor has determined that the facility is in compliance with this standard.

<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.54 - Third-party reporting</p> <p>(a) The Auditor visited the agency website and was easily able to access methods to make a third-party report, including via email, and through two telephone numbers. One of the numbers is directed to the OIG and the other to the ODOC Fugitive Apprehension and Investigations. The Auditor tested all three methods, each with successful results. The website also states that verbal reports can be made directly to the facility.</p> <p>The Auditor also observed signage in all housing areas and other conspicuous locations of the facility on directions for third-party reporting.</p> <p>Based on a review of the agency’s website, and a test of third-party reporting mechanisms, the Auditor has determined that the facility has exceeded this standard.</p>

<b>115.61</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.61 - Staff and agency reporting duties</p> <p>(a)(b)(c) OP-030601 requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility. It also requires all staff to report immediately and according to agency policy any retaliation against inmates or staff who reported such an incident, and to report immediately and according to agency policy any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</p> <p>The Auditor interviewed randomly selected staff, all of whom stated they must report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in the facility. Each also said they have an obligation to report any retaliation against staff or inmates for reporting such an incident.</p> <p>All staff members stated they would notify a supervisor immediately and would be required to document their knowledge in writing. most staff members indicated they would be prohibited from revealing any information regarding the incident outside of what was necessary for treatment or management of the facility.</p>

	<p>The Auditor also interviewed a staff member from Medical and one from Mental Health staff member. They stated that at the initiation of services, they disclose the limitations of confidentiality to the inmate. Additionally, they stated they would contact a supervisor upon learning of the alleged sexual abuse or sexual harassment. Both staff members stated an inmate reported sexual abuse to them, and they immediately notified a security supervisor.</p> <p>(d)(e) The Auditor interviewed the Warden and the A/PC, both of whom acknowledged that if an alleged inmate were considered a vulnerable adult (the facility does not house youthful offenders), they a report of the allegation to the designated State or local services agency under mandatory reporting laws. The Warden also said that the facility would report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to facility investigators.</p> <p>Based on a review of agency policy and interviews with the Warden, A/PC, and Medical/Mental Health Staff, and a random sample of staff, the Auditor has determined that the facility is in compliance with this standard</p>
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<b>115.62</b>	<b>Agency protection duties</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Standard 115.62 - Agency protection duties</p> <p>(a) OP-030601 states that when the agency learns an inmate is subject to substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate.</p> <p>In the past 12 months the facility reported that 0 inmates were subject to substantial risk of imminent sexual abuse. In each case the facility took immediate action. Based on this number and the facility's response, it was clear to the Auditor that the facility takes the sexual safety of its inmate population extremely seriously.</p> <p>The Auditor interviewed the Warden who stated that any time an inmate is subject to substantial risk of imminent sexual abuse, the facility will take immediate action.</p> <p>The Auditor interviewed randomly selected staff, and each said that if an inmate were at risk of imminent sexual abuse, they would immediately separate or move the inmate from the area and contact a supervisor. None of the staff members hesitated in their answer and confidently stated the first course of action was to separate the inmate from the immediate area.</p> <p>Based on a review of agency policy, and interviews with the Warden and a random sample of staff, the Auditor has determined that the facility has exceeded this standard.</p>

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.63 - Reporting to other confinement facilities</p> <p>(a)(b)(c) OP-030601 states that upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred.</p> <p>In the past 12 months the facility reported no inmates alleged that they were abused while confined at another facility. In each case, the facility where the alleged abuse occurred was notified telephonically and via email. Each inmate was then immediately referred to the medical and mental health. The agency policy requires that the facility head provide such notification as soon as possible, but no later than 72 hours after receiving the allegation, and documents that notification. The warden documents the notification to another facility through email within 72 hours of receiving the allegation.</p> <p>(d) OP-03601 states that the agency or facility policy requires that allegations received from other facilities and agencies are investigated in accordance with the PREA standards.</p> <p>In the past 12 months the facility reported no allegations of sexual abuse the facility received from other facilities.</p> <p>The Auditor interviewed the Warden who said that when the facility receives an allegation from another facility that an incident of sexual abuse occurred in their facility, they would immediately initiate an investigation and make notifications to the OIG. They said they would coordinate with the reporting facility to ensure the inmate is treated medically and by mental health when necessary. They said the OIG, based on the circumstances, would determine if they would respond immediately, and ultimately decide who would conduct the investigation.</p> <p>Based on a review of agency policy and interview with the Warden, the Auditor has determined that the facility is in compliance with this standard.</p>

<b>115.64</b>	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Standard 115.64 - Staff first responder duties

(a) OP-030601 states that upon learning of an allegation that an inmate was sexually abused:

If the first staff member to respond is a correctional officer, the following shall be required:

(1) Separate the alleged victim and abuser (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence (3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.

In the past 12 months the facility reported 2 allegations that an inmate was sexually abused. In each case, the first security officer to respond separated the alleged victim and abuser.

The facility reported that one case was reported within a time frame that allowed for the collection of physical evidence. This was also the case that the first security staff member to respond to the report was able to preserve and protect any crime scene until appropriate steps could be taken to collect any evidence.

The Auditor interviewed one Security Staff First Responders. They were able to clearly articulate their responsibilities in separating alleged victims and abusers, safeguarding potential crime scenes, and protecting potential evidence.

(b) OP-030601 requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence. This same policy also requires that if the first staff responder is not a security staff member, that responder shall be required to notify security staff.

In the past 12 months the facility reported that there was one allegation of sexual abuse that reported to a non-security staff member.

The Auditor interviewed Security Staff members Who Have Acted as First Responders. They were able to clearly articulate their responsibilities in separating alleged victims and abusers, safeguarding potential crime scenes, and protecting potential evidence.

The Auditor also interviewed randomly selected staff members, all of which were able to clearly articulate their responsibilities in accordance with this standard. Each stated the only person they would share information regarding the allegation would be to a supervisor, unless directed otherwise.

Based on a review of agency policy, and interviews with Security and Non-Security Staff First Responders, and random sample of staff, the Auditor has determined that the facility is in compliance with this standard.

	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.65 - Coordinated response</p> <p>(a) The facility has developed the HMCC – PREA Coordinated Response Plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p>The Auditor reviewed the Response Plan and found it to be extremely thorough, clearly delineating the responsibilities of first responders, medical and mentally health practitioners, investigators and facility leadership. The document also contains multiple attachments to help direct personnel in their area of responsibility.</p> <p>The Auditor interviewed the Warden, who was extremely articulate and knowledgeable regarding the plan and how it is to be implemented.</p> <p>The plan was reviewed and approved on January 2, 2024, by the Warden, Deputy Warden, and the Chief of Security.</p> <p>Based on a review of the Coordinated Response Plan and interview with the Warden the Auditor has determined that the facility has exceeded this standard.</p>

<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>Standard 115.66 - Preservation of ability to protect inmates from contact with abusers</p> <p>(a) The Auditor interviewed the Warden who stated that the agency, facility, or any other governmental entity responsible for collective bargaining on the agency's behalf has not entered into or renewed any collective bargaining agreement or other agreement since August 20, 2012, or since the last PREA audit, whichever is later.</p> <p>The Auditor is not required to audit this provision.</p> <p>Based on the statements of the Warden, the Auditor has determined that the facility is in compliance with this standard.</p>

<b>115.67</b>	<b>Agency protection against retaliation</b>
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**Auditor Overall Determination:** Exceeds Standard

**Auditor Discussion**

Standard 115.67 - Agency protection against retaliation

(a)(b)(c)(d)(e) OP-030601 states that the facility shall ensure any inmate or staff reporting allegations of sexual abuse or sexual harassment or cooperate in an investigation involving such allegations are protected from retaliation by other inmates or staff. The facility/unit head shall designate staff to monitor retaliation and take appropriate action(s) to include:

1. Employing protective measures, such as housing changes or transfers for inmate victims or abusers
2. Removal of alleged staff or inmate abusers from contact with victims
3. Engaging emotional support services such as mental health services for inmates and the Employee Assistance Program for staff who fear retaliation for reporting sexual abuse or harassment or for cooperating with investigations
4. For at least 90 days following a report of sexual abuse or sexual harassment, a facility designated monitor(s) shall assess the conduct and treatment of the inmates or staff who reported the abuse and of inmates who were reported to have suffered sexual abuse for changes that may suggest possible retaliation by inmates or staff.

Findings shall be reported to the facility/unit head who shall act promptly to remedy any such retaliation. The facility monitoring will include:

- a. Inmate discipline or misconducts
- b. Housing, program or classification changes
- c. Negative job/performance reviews
- d. Reassignment of staff
- e. If the inmate or staff is transferred during this 90-day period, the facility head of the current facility shall notify the receiving facility head of the continued need for monitoring
- f. The agency shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need
- g. In the case of inmates, such monitoring shall also include periodic status checks

The Auditor interviewed the Warden who was able to clearly and articulately describe the measures stated in the agency's policy regarding retaliation.

The Auditor interviewed the PCM, who is responsible for monitoring retaliation. They

	<p>said that they are personally responsible for ensuring that the policy and procedures are followed and that all staff take the subject of retaliation seriously. They said that they monitor housing and working assignments, along with changes in programming to ensure no retaliation is occurring. He speaks personally with the inmates and will do so for at least 90 days following an allegation.</p> <p>The Auditor was unable to interview inmates who reported sexual abuse as they were no longer on the unit.</p> <p>In the past 12 months the facility reported no incidents of retaliation.</p> <p>The Auditor reviewed investigative files and found that all which required retaliation monitoring contained the appropriate documentation. The Auditor found that the entries on the monitoring forms were thorough and that the facility takes retaliation very seriously.</p> <p>Based on a review of agency policy, a review of retaliation monitoring forms, interviews with the Warden, and the PMC, the Auditor has determined that the facility has exceeded this standard.</p>
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<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.68 - Post-allegation protective custody</p> <p>Agency policy OP-030601 requires the following: Use of Protective Custody and Segregation</p> <p>A. Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for no more than 24 hours while completing the assessment.</p> <p>B. Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education or work opportunities the facility shall document</p> <p>1.) The opportunities that have been limited 2.) The duration of limitation 3.) The reasons for such limitations</p> <p>C. The facility shall assign such inmates to involuntary segregated housing only until</p>

	<p>an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days</p> <p>D. If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, the facility shall clearly document 1. The basis for the facility's concern for the inmate's safety 2. The reason why no alternative means of separation can be arranged.</p> <p>E. Every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.</p> <p>F. Inmates who have alleged to have suffered sexual abuse are subject to the above requirements.</p> <p>In the past 12 months, the facility reported no inmates had been placed in involuntary segregated housing in accordance with this standard.</p> <p>The Auditor interviewed the Warden and Staff who Supervise Inmates in Segregated Housing, and both stated that the facility does not involuntarily segregate inmates who are at high risk of sexual victimization or who have alleged sexual abuse.</p> <p>Based on a review of agency policy and interviews with the Warden and Staff who Supervise Inmates in Segregated Housing, the Auditor has determined that the facility is in compliance with this standard.</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>Standard 115.71 - Criminal and administrative agency investigations</p> <p>(a)(b) P-040117 states that all allegations of sexual abuse and harassment, including third party and anonymous reports, will be reviewed to determine if sufficient information exists to complete a formal investigation. If an investigation is conducted, it will be done promptly, thoroughly and objectively.</p> <p>The Auditor interviewed one investigative agent from the OIG. They said that as soon as a facility becomes aware of an allegation of sexual abuse or sexual harassment, the OIG Agent in Charge (AIC) is contacted and determines if an immediate response is required. All allegations, whether they are deemed to be criminal or not, are referred to the OIG. The AIC will also determine whether an investigation is warranted based on the information received from the facility. The agent said that if they become aware of a third-party or anonymous allegation, they would immediately contact the facility and initiate an investigation based on the information received in the allegation. This was also confirmed by an interview with a facility investigator. The Auditor reviewed investigative files and observed that all had been immediately</p>

referred to the OIG at the time of the allegation.

At the time of the audit, the OIG investigator had received the specialized training to investigate sexual abuse and sexual harassment in a confinement setting. The Auditor confirmed the training by reviewing training records.

(c)(d)(e)(f) The Auditor interviewed one OIG investigative agent. They said that when notified of a sexual assault, they would immediately contact the facility to ascertain that the crime scene (if known) had been secured, assuming that the incident had occurred within the last 120 hours. They would also ensure that any physical evidence at the scene is safeguarded. A sexual assault that occurred within 120 hours of the allegation would necessitate a forensic medical exam to gather DNA and other physical evidence. They said they would interview the victim, any witnesses, gather video, if available, and attempt to speak with the suspect, ensuring proper warnings (Miranda and Garrity) are followed, when necessary. They would collect reports and use all interview statements and evidence to determine whether a criminal filing is warranted. Each said the length of time for an investigation is difficult to gauge based on the many contributing factors. The agent said they would be responsible for gathering all physical and circumstantial evidence. The agent also stated that when the quality of evidence supports a criminal prosecution, they would consult with the local district attorney before conducting any compelled interviews. In the interview, the agent said that the credibility of an alleged victim, or witness will be assessed on an individual basis and shall not be determined by the person's status as an inmate or staff. They also stated that no inmate who alleges sexual abuse will submit to a polygraph examination as a condition for proceeding with an investigation.

The Auditor was unable to interviewed inmates who reported sexual abuse, as there were none on facility at the time of audit.

The Auditor interviewed the one OIG investigative agent and a facility investigator regarding administrative investigations. They said that the OIG will determine who conducts an administrative investigation based on the known factors. Regardless, they said that the investigation would include an effort to determine whether staff actions or failures to act contributed to the abuse and shall be documented in written reports.

The agency maintains all investigative files electronically, and are secured through password-protected programs, with access only by investigators and management staff. For the purposes of the onsite audit, the facility and A/PC provided the Auditor with printed copies of each investigation.

(g)(h)(i)(j) The Auditor thoroughly examined investigative files during the onsite audit. Each criminal investigation contained detailed written reports, that described all the evidence.

The Auditor interviewed one OIG investigative agent, who confirmed this process for all criminal investigations. The agent also said that when substantiated allegations appear to be criminal, they are referred for prosecution.

	<p>In the past 12 months no cases from the facility had been referred for prosecution.</p> <p>OP-030601 states that the agency retains all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. This same policy says that 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. This was confirmed by the Auditors in interviews with all three investigators.</p> <p>(k) The Auditor is not required to audit this provision.</p> <p>(l) The Auditor interviewed the Warden, A/PC, PCM and investigators and determined that if an outside agency were to investigate sexual abuse, they would fully cooperate with that investigation and remain informed about its progress.</p> <p>The Warden stated that the PCM would monitor the investigation and keep them informed and updated on progress and any pertinent information.</p> <p>Based on a review of agency policy and review of investigations, the Auditor has determined that the facility is in compliance with this standard.</p>
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<b>115.72</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.72 - Evidentiary standard for administrative investigations</p> <p>(a) OP-030601 states that there shall not be any standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment is substantiated.</p> <p>The Auditor interviewed one OIG investigative agent and a facility investigator, all of whom confirmed that the preponderance of the evidence standard is used in determining whether sexual abuse or sexual harassment allegations are substantiated.</p> <p>The Auditor reviewed investigative files regarding this standard to determine compliance.</p> <p>Based on a review of agency policy, interviews with three investigators, and an assessment of investigative files, the Auditor has determined that the facility is in compliance with this standard.</p>

<b>115.73</b>	<b>Reporting to inmates</b>
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**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Standard 115.73 - Reporting to inmates

(a)(b) OP-030601 states that following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility (state or contracted with ODOC), the facility head shall inform the inmate victim at the conclusion of the investigation as to whether the allegation has been determined to be substantiated, unsubstantiated or unfounded. The facility utilizes Attachment D of the policy, "Notification of Investigation Status" to notify inmates in writing on the disposition of the investigation. The form requires the inmate's signature confirming receipt.

The Auditor interviewed OIG investigative agent, one facility investigator, and the Warden, all of whom confirmed that it's the agency's policy to notify the alleged victim in writing on the outcome of a sexual abuse or sexual harassment investigation.

The Auditor reviewed investigative files and found that all which required notification to the alleged victim contained the appropriate documentation.

Outside agencies are not utilized to conduct investigations.

(c) OP-030601 states that following an inmate's allegation that a staff member has committed a sexual offense against the inmate, the facility head shall:

1. Subsequently inform the inmate victim (unless the investigation determines the allegation is unfounded) whenever the staff member is:
  - a. No longer posted at the inmate's unit
  - b. No longer employed at the facility
  - c. Indicted on a sexual offense
  - d. Convicted of a sexual offense

The facility reports that there have been no substantiated or unsubstantiated complaints of sexual abuse committed by a staff member against an inmate in the past 12 months.

(d)(e) OP-030601 states that following an inmate's allegation of a sexual offense by another inmate, the facility head or designee shall:

1. Subsequently inform the alleged victim whenever the suspect inmate has been indicted or convicted on the sexual offense
2. The facility head will ensure notifications to inmates are documented on the "Notification of Investigation Status" form and the original placed in the facility investigation file

The Auditor was unable to interviewed inmates who reported sexual abuse, as there were none on the facility during the audit.

	<p>OP-030601 states that following an investigation into an inmate’s allegation that he or she suffered sexual abuse in an agency facility (state or contracted with ODOC), the facility head shall inform the inmate victim at the conclusion of the investigation as to whether the allegation has been determined to be substantiated, unsubstantiated or unfounded.</p> <p>The facility reported two allegations meeting the requirement for this standard and in each case, notifications were made to the inmate. The Auditor reviewed investigative files and found that both of the aforementioned cases had documented notifications to the inmate.</p> <p>(f) Auditor is not required to audit this provision.</p> <p>Based on a review of agency policy, investigative files, and interviews with the Warden, the Auditor has determined that the facility is in compliance with this standard.</p>
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<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.76 - Disciplinary sanctions for staff</p> <p>(a)(b)(c)(d) OP-030601 states that staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.</p> <p>The facility reported that no staff member has resigned for violating agency sexual abuse or sexual harassment policies.</p> <p>The facility reported that no staff members had been disciplined short of termination for violation of the agency’s sexual abuse or sexual harassment policies. OP-030601 requires that all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies (unless the activity was clearly not criminal) and to any relevant licensing bodies. The facility reported no such reports to law enforcement or licensing boards in the past 12 months.</p> <p>The Auditor interviewed the PCM, who confirmed the facility’s reported information.</p> <p>Based on a review of agency policy, information provided by the facility, and an interview with the PCM, the Auditor has determined that the facility is in compliance with this standard.</p>

115.77	Corrective action for contractors and volunteers
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 264 544 297"><b>Auditor Discussion</b></p> <p data-bbox="256 338 1201 371">Standard 115.77 - Corrective action for contractors and volunteers</p> <p data-bbox="256 412 1481 779">(a) OP-030601 states that for the purpose of this procedure (Oklahoma Prison Rape Elimination Act), the terms “staff” and “employee” includes all ODOC employees, contract personnel, contract employers, volunteers, official visitors or other agency representatives. (PREA 115.77(a)) The term “facility” shall refer to all state institutions, community centers and private prisons. The same policy says that staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexualharassment policies. OP-030601 also requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with inmates.</p> <p data-bbox="256 819 1477 1019">In the past 12 months no contractors or volunteers were reported to law enforcement or relevant licensing bodies for engaging in sexual abuse of inmates. OP-030601 states that the facility takes appropriate remedial measures and considers whether to prohibit further contact with inmates in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p data-bbox="256 1059 1378 1173">The Auditor interviewed the Warden, and they stated that any contractor who violated the agency’s sexual abuse or sexual harassment policies would not be permitted to work at the facility.</p> <p data-bbox="256 1214 1481 1285">Based on a review of agency policy and an interview with the Warden, the Auditor has determined that the facility is in compliance with this standard.</p>

115.78	Disciplinary sanctions for inmates
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 1572 544 1606"><b>Auditor Discussion</b></p> <p data-bbox="256 1646 1002 1680">Standard 115.78 - Disciplinary sanctions for inmates</p> <p data-bbox="256 1720 1461 1964">(a)(b)(c) OP-030601 states all inmates or staff members found guilty of committing sexual assault are disciplined in accordance with agency procedures and will be referred for criminal prosecution by the office of the Inspector General. The policy also says that inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse.</p> <p data-bbox="256 2004 1390 2076">In the past 12 months, the facility found no administrative finding of inmate-on-inmate sexual abuse that occurred at the facility.</p>



	<p>In the past 12 months, there have been no criminal findings of guilt for inmate-on-inmate sexual abuse reported by the facility.</p> <p>The Warden was interviewed by the Auditor, and they stated that disciplinary sanctions against inmates are proportionate to the nature of the abuse committed and the inmates' disciplinary history. They also said that any mental disability or illness would be considered when determining sanctions.</p> <p>(d) OP-030601 states that the facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse, and it considers whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.</p> <p>The Auditor interviewed a member of the Medical and Mental Health, staff and confirmed that therapy, counseling, or other interventions are offered to address the underlying reasons or motivations for abuse. They said that if an inmate chose not to participate, it would not prohibit them from participating in other programming.</p> <p>(e)(f)(g) OP-030601 says that the agency disciplines inmates for sexual conduct with staff only upon finding that the staff member did not consent to such contact. This same policy also states that the agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation. OP-030601 prohibits all sexual activity between inmates. It also prohibits all sexual activity between inmates and disciplines inmates for such activity, the agency deems such activity to constitute sexual abuse only if it determines that the activity is coerced.</p> <p>Based on a review of agency policy and interviews with the Warden and Medical/ Mental Health staff members, the Auditor has determined that the facility is in compliance with this standard.</p>
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<b>115.81</b>	<p><b>Medical and mental health screenings; history of sexual abuse</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Standard 115.81 - Medical and mental health screenings; history of sexual abuse</p> <p>(a) OP-140100 states that all inmates at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.41 are offered a follow-up meeting with a medical or mental health practitioner, and the follow-up meeting is offered within 14 days of the intake screening.</p> <p>The facility reported that 100% of inmates who previously perpetrated sexual abuse,</p>
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as indicated during the screening, who were offered a follow-up meeting with a mental health practitioner: Medical and mental health staff maintain secondary materials (e.g., form, log) documenting compliance with the above required services.

The facility reported 100% of inmates who disclosed sexual victimization. The Auditor also interviewed a staff member responsible for risk screening and they said inmates who report sexual victimization at risk screening are immediately referred to medical and mental health.

The Auditor reviewed electronic medical records and confirmed compliance with this standard.

(b) OP-140100 states that inmates who have previously perpetrated sexual abuse, as indicated during the screening pursuant to § 115.41, are offered a follow-up meeting with a mental health practitioner, and that the meeting will occur within 14 days.

The facility reported that 100% of inmates who have previously perpetrated sexual abuse during screening were offered a follow-up meeting with a medical or mental health practitioner. Medical and mental health staff maintain secondary materials (e.g., form, log) documenting compliance with the above required services.

The Auditor also interviewed a staff member responsible for risk screening and they said inmates who report prior perpetration of abuse at risk screening are immediately referred to medical and mental health.

The Auditor reviewed electronic medical records and confirmed compliance with this standard.

The Auditor reviewed the electronic medical records, which are password-protected, with access limited to medical and mental health staff only. This was also confirmed in formal interviews and informal conversations with medical and mental health staff.

(d)(e) OP-140100 says that the information related to sexual victimization or abusiveness that occurred in an institutional setting shared with other staff is strictly limited to informing security and management decisions, including treatment plans, housing, bed, work, education, and program assignments, or as otherwise required by federal, state, or local law.

The Auditor interviewed medical and mental health staff, who confirmed that 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.

Based on a review of agency policy, interviews with staff responsible for risk screening, and medical/mental health staff, along with a review of the electronic medical records system, the Auditor has determined that the facility is in compliance with this standard.

<b>115.82</b>	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Standard 115.82 - Access to emergency medical and mental health services</p> <p>(a)(b)(c)(d) The Auditor interviewed medical and mental health staff, and security first responders, and all confirmed that inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. Mental health staff said that the nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment.</p> <p>The Auditor also learned through interviews and a review of electronic medical records that medical and mental health staff maintain secondary materials (e.g., form, log) documenting the timeliness of emergency medical treatment and crisis intervention services that were provided, the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services concerning contraception and sexually transmitted infection prophylaxis.</p> <p>The Auditor interviewed security first responders, who said that if no qualified medical or mental health practitioners are on duty at the time of an alleged sexual abuse, they would take steps to protect the victim pursuant to §115.62 and notify appropriate medical and mental health staff. The first responders stated that the overnight hours and weekends there is limited medical staff, but there are on-call medical and mental health staff members who can respond.</p> <p>This was also confirmed with the Auditor’s interviews with medical and mental health staff. Mental health staff also said that inmate victims of sexual abuse while incarcerated are 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>OP-140118 says that all Treatment services are provided to every 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>Based on a review of agency policy, electronic medical records, and interviews with medical and mental health staff, security and non-security first responders, the Auditor has determined that the facility is in compliance with this standard.</p>

<b>115.83</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard

	<p><b>Auditor Discussion</b></p> <p>Standard 115.83 - Ongoing medical and mental health care for sexual abuse victims and abusers</p> <p>(a)(b)(c)(d)(e)(f)(g)(h) OP-140118 states that the facility offers medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse.</p> <p>The Auditor interviewed medical and mental health staff who said that evaluation and treatment of victims include follow-up services, treatment plans, and when necessary, referrals for continued care following their transfer or placement in other facilities, or their release from custody. They additionally said that the treatment(s) provided are consistent with the community level of care.</p> <p>The Auditor was unable to interviewed inmates who reported sexual abuse, as there were none while onsite.</p> <p>The Auditor reviewed electronic medical records and confirmed follow-up treatment referrals. OP-140118 states that female victims of sexual abusive vaginal penetration while incarcerated are offered pregnancy tests. Additionally, the policy says that If pregnancy results from sexual abuse while incarcerated, victims receive timely and comprehensive information about, and timely access to, all lawful pregnancy-related medical services. This was confirmed in the Auditor’s interviews with medical and mental health staff.</p> <p>The facility does not house female inmates.</p> <p>This same policy says that inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. OP-030601 states that treatment services are 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. This was confirmed in an interview with an inmate who reported sexual abuse.</p> <p>OP-030601 says that it attempts to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners. This was confirmed in interviews with medical and mental health staff, and the Auditor’s review of electronic medical records.</p> <p>Based on a review of agency policy, electronic medical records, and interviews with medical and mental health staff, the Auditor has determined that the facility is in compliance with this standard.</p>
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<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard

	<p><b>Auditor Discussion</b></p> <p>Standard 115.86 - Sexual abuse incident reviews</p> <p>(a)(b)(c)(d) OP-030601 states that in all instances where a sexual abuse investigation occurs, regardless of findings, at the conclusion of the investigation the facility shall conduct a sexual abuse incident review. This review shall occur within 30 days of the receipt by the facility or of OIG investigative findings. The review team shall include administrative staff, with input from line supervisors, investigators, medical/mental health professional and facility PREA compliance manager.</p> <p>The facility reported that in the past 12 months, there was one Sexual Abuse/ Harassment reviews.</p> <p>The review team shall:</p> <ol style="list-style-type: none"> <li>1. Convene monthly to review any facility incident or OIG investigation</li> <li>2. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse</li> <li>3. Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affliction; or was motivated or otherwise caused by other group dynamics at the facility</li> <li>4. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse</li> </ol> <p>OP-030601 requires that the facility prepares a report of its findings from sexual abuse incident reviews including, but not necessarily limited to, determinations made pursuant to paragraphs</p> <p>(d)(1) -(d)(5) of this section and any recommendations for improvement and submits such report to the facility head and PREA Compliance Manager.</p> <p>The Auditor interviewed the Warden, PCM and a member of the Incident Review Team. All were extremely articulate and knowledgeable about the Team’s responsibilities and areas of consideration when reviewing an incident. They were all fully aware of the report’s timelines and distribution. It was clear to the Auditor that each staff member took the process very seriously and continually looked for areas of improvement. All said that when improvements are identified that the entire team works toward implementation as quickly as possible.</p> <p>Based on a review of agency policy, completed Incident Reviews, and interviews with the Warden, PCM, and an Incident Review Team Member, the Auditor has determined that the facility is in compliance with this standard.</p>
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<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard

	<p><b>Auditor Discussion</b></p> <p>Standard 115.87 - Data collection</p> <p>(a)(b)(c)(d)(e) OP-030601 states that the Office of the Inspector General shall collect accurate, uniform data for every allegation of sexual abuse at facilities using a standardized instrument and set of definitions. The data shall be securely retained.</p> <p>The Auditor reviewed the agency’s annual reports and confirmed that it aggregates sexual abuse related data annually.</p> <p>OP-030601 says that incident-based data collected shall 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. This same policy says that the agency shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. This same policy requires that the agency shall also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates. The data from private facilities complies with SSV reporting regarding content.</p> <p>The Auditor confirmed that the agency provided the Department of Justice (DOJ) with data from the previous calendar year upon request.</p> <p>Based on a review of agency policy and aggregated incident data, the Auditor has determined that the facility is in compliance with this standard.</p>
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<b>115.88</b>	<b>Data review for corrective action</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Standard 115.88 - Data review for corrective action</p> <p>(a)(b)(c)(d) The Auditor reviewed data collection through the agency’s annual reports and found that it aggregated pursuant to §115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including:</p> <ul style="list-style-type: none"> <li>• Identifying problem areas.</li> <li>• Taking corrective action on an ongoing basis; and</li> <li>• Preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.</li> </ul> <p>The annual reports include a comparison of the current year's data and corrective actions with those from prior years, and an assessment of the agency's progress in addressing sexual abuse.</p>

	<p>The Auditor was easily able to locate the annual reports on the agency website and they are approved by the agency head.</p> <p>The Auditor interviewed the Warden, A/PC, and PCM, all of whom acknowledged and confirmed the agency's data collection and reporting practices through its annual report.</p> <p>The Auditor interviewed the A/PC who said that if the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility, and that it would indicate the nature of the material redacted.</p> <p>Based on a review of the agency's data collection, its annual reports, and interviews with the Warden, A/PC, and PCM, the Auditor has determined that the facility is in compliance with 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>
	<p>Standard 115.89 - Data storage, publication, and destruction</p> <p>(a)(b)(c) OP-030601 requires that incident-based and aggregate data are securely retained. This policy also says that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website. Based on a review by the Auditor of data made available to the public, the agency removes all personal identifiers.</p> <p>OP-030601 requires that sexual abuse data collected pursuant to §115.87 for at least 10 years after the date of initial collection, unless federal, state, or local law requires otherwise.</p> <p>Based on a review of the agency's publicly released data, and an interview with the A/PC, the Auditor has determined that the facility is in compliance with this standard.</p>

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Standard 115.401 - Frequency and scope of audits

	<p>During the three-year period starting on August 20, 2013, and during each three-year period thereafter, the agency ensured that each facility operated by the agency is audited at least once, as evidenced by the Auditor’s review of the website.</p> <p>During each one-year period starting on August 20, 2013, the agency ensured that at least one-third of each facility type operated by the agency is audited, as confirmed by the Auditor’s website review.</p> <p>The auditor had access to, and observed, all areas of the audited facility. The auditor was permitted to request and receive copies of any relevant documents (including electronically stored information).</p> <p>The auditor was permitted to conduct private interviews with inmates. Inmates were permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel, via United States Post Office mail, as well as email, as evidenced by the Notice of Audit and observations made during the site review. The auditor did not receive any written or electronic correspondence from inmates from this facility.</p> <p>Based on the Auditor’s review, the facility is in compliance with this standard.</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>Standard 115.403 - Audit contents and findings</p> <p>The agency ensures that the auditor’s final reports are published on the agency’s website, as evidenced by a review of the agency’s website.</p> <p>Based on the evidence presented, the facility is in compliance with this standard.</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.)	yes
<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
<b>115.13 (d)</b>	<b>Supervision and monitoring</b>	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

<b>115.14 (a)</b>	<b>Youthful inmates</b>	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.14 (b)</b>	<b>Youthful inmates</b>	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.14 (c)</b>	<b>Youthful inmates</b>	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.15 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
<b>115.15 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the	yes

	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)?	yes
<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
<b>115.15 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
<b>115.15 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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

	with inmates with disabilities including inmates who: Have intellectual disabilities?	
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
<b>115.16 (b)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
<b>115.16 (c)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
<b>115.17 (a)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who	yes

	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?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
<b>115.17 (b)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
<b>115.17 (c)</b>	<b>Hiring and promotion decisions</b>	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
<b>115.17 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes



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

	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	na
<b>115.21 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
<b>115.21 (b)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
<b>115.21 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes

	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
<b>115.21 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
<b>115.21 (e)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
<b>115.21 (f)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	na
<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).)	na
<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 inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
<b>115.31 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
<b>115.31 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
<b>115.31 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.32 (a)</b>	<b>Volunteer and contractor training</b>	

	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
<b>115.32 (b)</b>	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
<b>115.32 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
<b>115.33 (a)</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	yes

	Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.34 (c)</b>	<b>Specialized training: Investigations</b>	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.35 (a)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or	yes



	suspicious 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.)	
<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	yes

	screening instrument?	
<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
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10)	yes

	Whether the inmate is detained solely for civil immigration purposes?	
<b>115.41 (e)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
<b>115.41 (f)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes
<b>115.41 (g)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
<b>115.41 (h)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
<b>115.41 (i)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive	yes

	information is not exploited to the inmate’s detriment by staff or other inmates?	
<b>115.42 (a) Use of screening information</b>		
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
<b>115.42 (b) Use of screening information</b>		
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
<b>115.42 (c) Use of screening information</b>		
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate’s health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate’s health and safety, and whether a placement would	yes

	present management or security problems?	
<b>115.42 (d)</b>	<b>Use of screening information</b>	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes
<b>115.42 (e)</b>	<b>Use of screening information</b>	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
<b>115.42 (f)</b>	<b>Use of screening information</b>	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
<b>115.42 (g)</b>	<b>Use of screening information</b>	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing	yes

	solely for the placement of LGBT or I inmates pursuant to a consent degree, legal settlement, or legal judgement.)	
<b>115.43 (a)</b>	<b>Protective Custody</b>	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
<b>115.43 (b)</b>	<b>Protective Custody</b>	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na
	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.)	na
	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.)	na
<b>115.43 (c)</b>	<b>Protective Custody</b>	

	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
<b>115.43 (d) 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	yes

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
<b>115.51 (c)</b>	<b>Inmate reporting</b>	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.51 (d)</b>	<b>Inmate reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
<b>115.52 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
<b>115.52 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes



	this standard.)	
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (e)</b>	<b>Exhaustion of administrative remedies</b>	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (f)</b>	<b>Exhaustion of administrative remedies</b>	

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (g)</b>	<b>Exhaustion of administrative remedies</b>	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
<b>115.53 (a)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	na

	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.)	
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
<b>115.53 (b)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
<b>115.53 (c)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
<b>115.54 (a)</b>	<b>Third-party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
<b>115.61 (a)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual	yes

	abuse or sexual harassment or retaliation?	
<b>115.61 (b)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
<b>115.61 (c)</b>	<b>Staff and agency reporting duties</b>	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
<b>115.61 (d)</b>	<b>Staff and agency reporting duties</b>	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
<b>115.62 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
<b>115.63 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes

<b>115.63 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.63 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
<b>115.64 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
<b>115.64 (b)</b>	<b>Staff first responder duties</b>	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
<b>115.65 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in	yes

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

	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?	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
<b>115.67 (d)</b>	<b>Agency protection against retaliation</b>	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
<b>115.67 (e)</b>	<b>Agency protection against retaliation</b>	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
<b>115.68 (a)</b>	<b>Post-allegation protective custody</b>	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
<b>115.71 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	When the agency conducts its own investigations into allegations	yes

	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).)	
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
<b>115.71 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
<b>115.71 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
<b>115.71 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
<b>115.71 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
<b>115.71 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes



	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
<b>115.71 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
<b>115.71 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
<b>115.71 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
<b>115.71 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
<b>115.71 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes

<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
<b>115.73 (c)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (d)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	yes

	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?	
<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	yes

	evidence sufficient to substantiate the allegation?	
<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
<b>115.81 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
<b>115.81 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
<b>115.81 (e)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior	yes

	sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	
<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</b>	

	<b>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 has been determined to be unfounded?	yes
<b>115.86 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.86 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
<b>115.86 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.86 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes



<b>115.87 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
<b>115.87 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
<b>115.87 (c)</b>	<b>Data collection</b>	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
<b>115.87 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.87 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
<b>115.87 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
<b>115.88 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	yes

	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?	
<b>115.88 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
<b>115.88 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
<b>115.88 (d)</b>	<b>Data review for corrective action</b>	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
<b>115.89 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
<b>115.89 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
<b>115.89 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.89 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	

	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	no
	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.)	yes
<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</b>	<b>Audit contents and findings</b>	

<b>(f)</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 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.)	yes