

PREA Facility Audit Report: Final

Name of Facility: Jackson County Correctional Institution

Facility Type: Prison / Jail

Date Interim Report Submitted: 04/03/2019

Date Final Report Submitted: 09/04/2019

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Melinda Allen	Date of Signature: 09/04/2019

AUDITOR INFORMATION	
Auditor name:	Allen, Melinda
Address:	
Email:	preaaudit@gmail.com
Telephone number:	
Start Date of On-Site Audit:	03/04/2019
End Date of On-Site Audit:	03/06/2019

FACILITY INFORMATION	
Facility name:	Jackson County Correctional Institution
Facility physical address:	265 I.W. Davis Rd, Jefferson , Georgia - 30549
Facility Phone	7063876450
Facility mailing address:	265 I.W. Davis rd, Jefferson, Georgia - 30549

Primary Contact	
Name:	Luther Minix
Email Address:	lminix@jacksoncountygov.com
Telephone Number:	706-252-0509

Warden/Jail Administrator/Sheriff/Director	
Name:	Johnny Weaver
Email Address:	jweaver@jacksoncountygov.com
Telephone Number:	770-318-1294

Facility PREA Compliance Manager	
Name:	Luther Minix
Email Address:	lminix@jacksoncountygov.com
Telephone Number:	M: 706-252-0509

Facility Health Service Administrator On-site	
Name:	Karen Hall
Email Address:	jccimedical@jacksoncountygov.com
Telephone Number:	706-387-6461

Facility Characteristics	
Designed facility capacity:	170
Current population of facility:	149
Average daily population for the past 12 months:	
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	
Age range of population:	
Facility security levels/inmate custody levels:	Minimum, Medium
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	34
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	

AGENCY INFORMATION	
Name of agency:	Jackson County Correctional Institution
Governing authority or parent agency (if applicable):	Jackson County
Physical Address:	265 I.W. Davis Road, Jefferson, Georgia - 30549
Mailing Address:	
Telephone number:	7063876458

Agency Chief Executive Officer Information:	
Name:	Johnny Weaver
Email Address:	jweaver@jacksoncountygov.com
Telephone Number:	7063877345

Agency-Wide PREA Coordinator Information			
Name:	Jeff Coots	Email Address:	jcoots@jacksoncountygov.com

AUDIT FINDINGS

Narrative:

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

*****Disclaimer**

The PREA Resource Center made some revisions to the audit report during this audit. As a result, neither the facility nor the auditor are able to fill in the blanks where information is missing.

In order to provide a complete report I am providing that detail here.

Auditor Information:

Auditor's Address: P.O. Box 703; Braselton, GA 30517

Auditor's Telephone Number: 706-449-0003

Facility Information:

Average Daily Population: 146

Which population(s) does the facility hold? Adult Males

Age range of population: 20-50

Number of individual contractors who have contact with inmates, currently authorized to enter the facility:

6

Number of volunteers who have contact with inmates, currently authorized to enter the facility: 20

Report Begins:

The Jackson County Correctional Institute PREA audit was conducted March 04-06, 2019. The auditor wishes to extend its appreciation to Warden Tommy Weaver and his staff for the professionalism they demonstrated throughout the audit and for the kindness and hospitality they showed the auditor. The auditor also wishes to compliment Deputy Warden Jeff Coots for his work in organizing the audit files that for the on-site audit. This preparation enabled the audit to move forward very efficiently through the documentation phase of the audit.

The day before the audit was to begin, Deputy Warden Coots contacted me to inform me that the county's computer system had been hacked over the weekend. He asked if I wanted to reschedule since we may not be able to access data needed for the audit. Since I had another certified auditor, Faye Yelardy, coming to observe the audit process from out of state we decided to continue with the audit and get as much done as possible. The facility is located within a 30-minute drive of my residence so I could easily return at a later date if needed.

Prior to conducting the onsite visit to the facility, the auditor requested that the facility identify a

comprehensive list of inmates, staff, volunteers, and contractors along with relevant facility records to determine the universe of information from which the auditor would sample during the onsite portion of the PREA audit. From these listings, the auditor selected representative samples for interviews (i.e., inmate and staff) and document reviews during the onsite portion of the audit. The listings requested by the auditor in the pre-onsite audit phase included:

1. Complete inmate roster (provide based on actual population on the first day of the onsite portion of the audit)
2. Youthful inmates (if any)
3. Inmates with disabilities (i.e., physical disabilities, blind, deaf, hard of hearing, cognitive disabilities)
4. Inmates who are Limited English Proficient (LEP)
5. Lesbian, Gay, Bisexual, Transgender and Intersex (LGBTI) Inmates (identify all inmates in each category)
6. Inmates in segregated housing
7. Inmates who reported sexual abuse
8. Inmates who reported sexual victimization during risk screening
9. Complete staff roster (indicating title, shift, and post assignment)
10. Specialized staff which includes:
 - Agency contract administrator
 - Intermediate- or higher-level facility staff responsible for conducting and documenting unannounced rounds
 - Line staff who supervise youthful inmates, if any
 - Education staff who work with youthful inmates, if any
 - Program staff who work with youthful inmates, if any
 - Medical staff
 - Mental health staff
 - Non-medical staff involved in cross-gender strip or visual searches
 - Administrative (human resources) staff
 - SAFE and/or SANE staff
 - Volunteers who have contact with inmates
 - Contractors who have contact with inmates
 - Criminal investigative staff (e.g., at agency level, facility level, external entity, etc.)
 - Administrative investigative staff (e.g., at agency level, facility level, external entity, etc.)
 - Staff who perform screening for risk of victimization and abusiveness
 - Staff who supervise inmates in segregated housing
 - Staff on the sexual abuse incident review team
 - Designated staff member charged with monitoring retaliation
 - First responders , security staff (individuals who have responded to an incident of sexual abuse)
 - First responders , non-security staff (individuals who have responded to an incident of sexual abuse)
 - Intake staff
11. All grievances made in the 12 months preceding the audit
12. All incident reports from the 12 months preceding the audit
13. All allegations of sexual abuse and sexual harassment reported for investigation in the 12 months preceding the audit including:
 - Total number of allegations
 - Number determined to be substantiated, unsubstantiated, or unfounded
 - Number of cases in progress
 - Number of criminal cases investigations

Number of administrative case investigations

14. All hotline calls made during the 12 months preceding the audit

Upon arrival to the Jackson County Correctional Institute, the auditor met with the facility leadership to include Warden Tommy Weaver, Deputy Warden (PREA Coordinator) Jeff Coots, Captain Luther Minix PREA Compliance Manager and Lieutenant Garrett. The auditor explained the audit process and expectations for the audit. The auditor was given a through tour of the facility after the in-brief meeting. After the on-site review, the auditor began the interviews and review of investigative files and other proof documentation.

The facility provided the auditor the requested listings of documents, files and records. From this information, the auditor selected and reviewed a variety of files, records and documents summarized in the following table and discussed in detail below:

Personnel and Training Files.

The facility has 36 full and part-time staff. The auditor reviewed 12 personnel records that included 3 individuals hired within the past 12 months as well as 9 existing staff members. Additionally, the auditor reviewed one staff member who received a promotion in the last year. The sample included a variety of job functions and post assignments, including both supervisory and line staff. Files for two volunteers and three contractors who have contact with inmates were sampled randomly across functional service areas. Additionally, the auditor reviewed 12 training files for staff members that were selected randomly using a 3rd number method (i.e., 20) from the listing of all staff.

Inmate Files

On the first day of the onsite phase of the audit, the inmate population was 149. A total of 20 inmate records were reviewed by the auditor. Twenty inmate records were sampled across all housing units in the facility; the auditor was only able to locate one targeted inmate to interview and review file. This correctional institution is a work camp that only receives inmates in good health and physical condition. At the time of the audit, there were no inmates being housed that met the qualification of targeted inmates. The auditor did locate one individual that met the requirement during random interviews.

Medical and Mental Health Records

During the past year, there were no inmates that reported sexual abuse; there were no inmates that reported prior sexual victimization.

Grievances

In the past year, the facility received 57 grievances; the facility identified one grievance that alleged sexual abuse or sexual harassment. The auditor reviewed a random sample of a 10 grievances selected from across the housing units.

Incident Reports

The facility reported there were 117 incident reports for the 12 months prior to the audit. The auditor reviewed a random sample of 20 reports.

Investigation Files. During the past 12 months, there were 2 total allegations of PREA related misconduct at the facility broken down as follows:

A total of 2 administrative investigation records were provided to the auditor for incidents of sexual harassment that occurred in the past 12 months immediately preceding the audit. Of the 2 investigations, the dispositions to date are as follows:

Administrative Investigations

- 2 - Unsubstantiated Sexual Harassment Allegations

Interviews

The Auditor conducted the following number of inmate interviews during the onsite phase of the audit:

Random Inmates (Total) = 19

Targeted Inmates* (Total) = 1

Total Inmates Interviewed = 20

The breakdown of the number of targeted inmate interviews is as follows:

Youthful Inmates (0 identified)

Inmates with a Physical Disability (0 identified)

Inmates who are Blind, Deaf, or Hard of Hearing (0 identified)

Inmates who are LEP (0 identified)

Inmates with a Cognitive Disability (0 identified)

Inmates who Identify as Lesbian, Gay, or Bisexual (0 identified – 1 interviewed)

Inmates who Identify as Transgender or Intersex (0 identified)

Inmates in Segregated Housing for High Risk of Sexual Victimization (0 identified)

Inmates Who Reported Sexual Abuse (0 identified)

Inmates Who Reported Sexual Victimization During Risk Screening (0 identified)

Total targeted inmate interviews* = 01

In order to complete the minimum number of inmate interviews, additional randomly selected inmates were interviewed.

When the on-site audit was completed, the auditor conducted an exit debrief. While the auditor could not give the facility a final ruling/finding, as there was a lot of proof documentation interviews to review, the auditor did discuss areas where the facility had questions as to the compliance with specific standards. The auditor did give an overview of the audit and thanked the staff for their hard work and commitment toward compliance with the Prison Rape Elimination Act. After the on-site audit, the auditor reviewed proof documents secured while on-site and began to triangulate the evidence for compliance with the PREA Standards.

AUDIT FINDINGS

Facility Characteristics:

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

The Jackson County Correctional Institute is located in Jefferson, Georgia approximately 50 miles northeast of Atlanta, GA in Jackson County. It is a medium security institution that can hold 150 adult males. Inmates are housed in three open dormitories. There is another dorm that serves as the transition center. There are six cells within the dormitory, but separated by a wall that serve as segregation/isolation cells. Inmates who qualify can participate in work crews that work outside of the facility doing various labor for the Jackson county government, including working for the road department, vehicle and building maintenance, the department of sanitation, parks and recreation, and supportive roles for the emergency services in the county. The facility offers GED courses to provide inmates with the chance to further their education and increase the potential for inmates to obtain a job once they are released. Counseling for substance and alcohol abuse, and a re-entry program is designed to help modify an inmate's behavior and prepare them for their release.

The facility was originally opened in 1989. The Jackson County Correctional Institute is a small indirect supervision facility consisting of 150 hard beds. The population at the time of the audit was 149 inmates. The Jackson County Correctional Institute also provides a transition center to eligible residents under the guidelines and supervision of JCCI. The facility houses sentenced male felons, with minimum to medium security ratings. The inmates at the facility have less than 13 years remaining on their sentence.

AUDIT FINDINGS

Summary of Audit Findings:

The summary should include the number of standards exceeded, number of standards met, and number of standards not met, along with a list of each of the standards in each category. If relevant, provide a summarized description of the corrective action plan, including deficiencies observed, recommendations made, actions taken by the agency, relevant timelines, and methods used by the auditor to reassess compliance. Auditor Note: No standard should be found to be "Not Applicable" or "NA". A compliance determination must be made for each standard.

Number of standards exceeded:	0
Number of standards met:	45
Number of standards not met:	0

The interim report was provided on April 3, 2019, to the Jackson County Correctional Institute reporting 0 exceed standards; 36 met standards; 09 do not met standards.

Exceeds Standards: (none)

Meets Standards: (Thirty-six)

115.11, 115.12, 115.14, 115.22, 115.31, 115.32, 115.33, 115.34, 115.35, 115.41, 115.42, 115.43, 115.51, 115.52, 115.54, 115.61, 115.62, 115.63, 115.65, 115.66, 115.67, 115.68, 115.71, 115.72, 115.73, 115.76, 115.77, 115.78, 115.81, 115.82, 115.83, 115.86, 115.87, 115.89, 115.401, 115.403

Does Not Meet Standard: (nine) 115.13, 115.15, 115.16, 115.17, 115.18, 115.21, 115.53, 115.64, 115.88

On August 20, 2019, all corrective action was completed. The corrective action for each standard is detailed below.

115.13

August 20, 2019: A continuing review of unannounced rounds was conducted and determined that Lieutenants and higher are now conducting these rounds.

The Staffing Plan was revised to include the number of positions and vacancies that they have in the facility, how they arrived at the number of staffing needed to fill required positions, how many positions require 24/7 coverage, how many require 8 hours of coverage and considered shift relief factors and video monitoring.

115.15

Update August 20, 2019. For clarification, the facility does provide privacy for 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. Female staff do announce their presence when entering into the facility and would

only view inmates in a state of undress if inmates did not cover themselves when alerted of the female staff entering the facility or subsequent to exigent circumstances or routine cell checks. This was an error on the auditors part and should have been marked as meets compliance on the Interim Report.

115.16

Update August 20, 2019: The facility has entered into a pay for use contract with As Astra Inc. for Interpretation services.

115.17

Update 5/14/2019: Agency provided verification of completion of criminal background checks for prior sexual harassment and sexual abuse cases.

Update 8/20/2019: The agency provided proof documentation of the consideration of prior sexual abuse or sexual harassment for staff being considered for promotion.

115.18

Update 5/14/2019: Agency provided emails and letters to document the agencies attempt to protect inmates from sexual abuse by installing additional cameras and enhanced cameras in 2018.

Update 8/20/2019: The agency has provided an MOU with Phillips State Prison to provide SAFE/SANE forensic examinations and has secured an MOU with the Piedmont Rape Crisis Center to provide provide emotional support, crisis intervention, information, and referrals.

115.53

Update 8/20/2019: The agency has entered into a memorandum of understanding with the Piedmont Rape Crisis Center to provide advocacy services to inmates.

115.64

Update 5/14/19: Staff have been reissued laminated first responder cards and retrained during roll call training and staff meetings regarding their duties in responding to an incident.

Update 8/20/2019: The agency has ensured that all security first responders are familiar with the four required responsibilities when responding to a sexual abuse claim. This was reinforced through roll call training.

115.88

Update 8/20/19: The agency has updated their website to include a comparison of the number of cases investigated each year for comparison purposes.

Standards

Auditor Overall Determination Definitions

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

Auditor Discussion Instructions

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Jackson County Department of Corrections PREA Policy b. Georgia Department of Corrections Policy §208.06, Revised, March 2, 2018 c. Jackson County Correctional Institute Agency Organizational Chart 2019 d. Completed Pre-Audit Questionnaire <p>2. Interviews:</p> <ul style="list-style-type: none"> a. PREA Coordinator b. PREA Compliance Manager <p>Findings:</p> <p>The Jackson County Correctional Institution is a prison work camp with a contractual agreement to house state inmates for the Georgia Department of Corrections. Jackson County Correctional follows policies and procedures set forth by the Georgia Department of Corrections.</p> <p>The Jackson County Correctional Institute (JCCI) has implemented a zero tolerance policy as detailed in their PREA Policy titled, Sexually Abusive Behavior Prevention (PREA). This policy, in conjunction with the Georgia Department of Corrections Policy §208.06, revised 3/2/18, which the JCCI follows comprehensively addresses the agency’s approach to preventing, detecting, and responding to all forms of sexual abuse and sexual harassment. Policy §208.06 contains necessary definitions, sanctions and descriptions of the agency strategies and responses to sexual abuse and sexual harassment. This policy forms the foundation for the program’s training efforts with residents, staff, volunteers, contractors, and others.</p> <p>The agency has designed a PREA Coordinator, Jeff Coots. His official title is Deputy Warden with the Jackson County Correctional Institute. Mr. Coots has a PREA Compliance Manager, Mr. Luther Minix who is a Captain with the JCCI.</p> <p>The PREA Coordinator reports directly to the Warden, Mr. Johnny Weaver. Mr. Coots indicates that he has sufficient time and authority to develop, implement, and oversee the agency efforts toward PREA compliance and he has a PREA Compliance Managers that report directly to him. Interviews with the PREA Compliance Manager also reveal that he has sufficient time to dedicate to PREA compliance.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.)</p> <ul style="list-style-type: none"> a. Jackson County Department of Corrections PREA Policy b. Georgia Department of Corrections Policy §208.06, Revised, March 2, 2018 c. Contracts with the Georgia Department of Corrections 2017 and 2018. d. Completed Pre-Audit Questionnaire <p>2. Interviews:</p> <ul style="list-style-type: none"> a. PREA Coordinator b. PREA Compliance Manager <p>Findings:</p> <p>The Jackson County Correctional Institute does not contract with other facilities to house their inmates. They do contract directly with the Georgia Department of Corrections (GDOC) to house inmates in Jackson County. Part of the contract with the state DOC requires the JCCI to closely follow the GDOC PREA policies.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.13	Supervision and monitoring
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.)</p> <ul style="list-style-type: none"> a. Jackson County Correctional Institute Staffing Plan b. Pre-Audit Questionnaire Completed by JCCI c. Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act (PREA) Sexually Abusive Behavior Prevention and Intervention Program d. Annual Review of Staffing Plans e. Staff Daily Tour Logs <p>2. Interviews:</p> <ul style="list-style-type: none"> a. PREA coordinator b. Warden c. Intermediate and Higher-level staff <p>3. Site review observations:</p> <ul style="list-style-type: none"> a. Blind spots b. Camera placement in the facility c. Control station d. Staffing levels of housing units <p>Findings:</p> <p>The JCCI has a staffing plan that is missing the analysis of each of the factors dictated in the Standard. The Staffing Study provided provides a list of items reviewed for the purposes of the staffing study but does not prevent the documented analysis of each factor required in the standard.</p> <p>Corrective Action Recommendation:</p> <p>Appropriately document the analysis conducted to arrive at the results provided in the Staffing Plan. For example, the agency lists the number of positions and vacancies that they have in the facility. How did you arrive at the number of staffing needed to fill required positions? How many positions require 24/7 coverage? How many require 8 hours of coverage? What are your shift relief factors used to determine the number of staff needed to cover the required posts?</p> <p>During the on site audit, it was discovered that the PREA unannounced rounds were being conducted by officers and sergeants. Correctional Officers and Sergeants are not considered intermediate or higher level supervisors in the facility. This was corrected immediately during the on site audit. A review of the intermediate and higher-level unannounced rounds will be monitored during the corrective action phase for continued compliance.</p> <p>Update:</p>

August 20, 2019: A continuing review of unannounced rounds was conducted and determined that Lieutenants and higher are now conducting these rounds.

The Staffing Plan was revised to include the number of positions and vacancies that they have in the facility, how they arrived at the number of staffing needed to fill required positions, how many positions require 24/7 coverage, how many require 8 hours of coverage and considered shift relief factors and video monitoring.

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.)</p> <ul style="list-style-type: none"> a. Jackson County Correctional Institute Staffing Plan b. Pre-Audit Questionnaire Completed by JCCI c. Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act (PREA) Sexually Abusive Behavior Prevention and Intervention Program d. Housing Rosters of Facility Population e. Memorandum reference Youthful Offenders <p>2. Interviews:</p> <ul style="list-style-type: none"> a. PREA coordinator b. PREA Compliance Manager c. Warden <p>Findings:</p> <p>The Jackson County Correctional Institute does not house youthful offenders at this facility.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.15	Limits to cross-gender viewing and searches
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.)</p> <ul style="list-style-type: none"> a. Jackson County Correctional Institute PREA Policy b. Georgia Department of Corrections PREA Policy § 208.06, Revised 3.2.2018 c. Completed Pre-Audit Questionnaire submitted by JCCI d. Training documentation, Search Procedures training materials e. Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act (PREA) Sexually Abusive Behavior Prevention and Intervention Program <p>2. Interviews:</p> <ul style="list-style-type: none"> a. PREA Coordinator b. PREA Compliance Manager c. Interviews with random section of inmates d. Random sample of Staff <p>Findings:</p> <p>The JCCI and GDOC policies prohibit cross-gender strip searches completely and has an exigent circumstances exception. GDOC policy also prohibits staff from performing intrusive or invasive body cavity searches under all circumstances; staff is permitted to do a visual inspection of a resident's mouth cavity only. Cross-gender pat searches are authorized only in exigent circumstances and with supervisor approval. Policy prohibits staff from searching or physically examining a transgender or intersex resident for the sole purpose of determining the resident's genital status. The GDOC policy ensures that residents are able to shower, perform bodily functions, and change clothing with privacy. However, during the on site review of the facility, it was discovered that showers and toilets are visible to all staff conducting tours in the housing areas. Inmates generally shower one at a time, even though there are four shower heads in each shower area. Inmates line up their towels as place holders for sequence of showering upon return from work details. Policy and practice require announcement when staff of the opposite gender enter the housing unit and the shower/toilet area.</p> <p>Interviews with residents and staff confirm this as the policy and actual practice of the program on a consistent basis. The JCCI reports that it has conducted no cross-gender strip or cross-gender visual body cavity searches of residents in the last 12 months. Additionally, JCCI reports no cross-gender pat down searches were conducted. There were no exigent circumstances searches in any category conducted. GDOC policy and practice prohibit searching or physically examining a transgender or intersex resident for the sole purpose of determining the resident's genital status. The agency has provided some basic training to staff regarding how to conduct cross-gender pat down searches and searches of transgender and intersex residents in a professional manner.</p> <p>Corrective Action Recommendation:</p>

Provide for privacy in the showers and toilet areas.

Update August 20, 2019. For clarification, the facility does provide privacy for 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. Female staff do announce their presence when entering into the facility and would only view inmates in a state of undress if inmates did not cover themselves when alerted of the female staff entering the facility or subsequent to exigent circumstances or routine cell checks. This was an error on the auditors part and should have been marked as meets compliance on the initial Interim Report.

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. GDOC Policy: §208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. Samples of PREA poster and brochure translated into Spanish d. Contract between Jackson County Correctional Institute and Jackson County Sheriff's Office e. Email correspondence between auditor and JCSO to verify contract translation services and confirmation of provider. f. PREA Training Materials for inmate education g. Memorandum of per use contract with ADASTRA INC. for Interpretation services <p>2. Interviews:</p> <ul style="list-style-type: none"> a. PREA Coordinator b. PREA Compliance Manager c. Warden d. Random sample of facility staff e. Random sample of residents <p>3. Site review observations:</p> <ul style="list-style-type: none"> a. PREA Posters and Signage <p>Findings:</p> <p>The JCCI/GDOC policy requires the program to ensure residents with special needs 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 harassment. Policy further prohibits the use of residents/clients as interpreters when dealing with first responder situations or any allegation/investigations of sexual abuse or harassment. The JCCI has a contract the Jackson County Sheriff's Office (JCSO) to provide translation services. I contacted the JCSO to verify who they contract with for translation services. The JCSO does not have a contract for translation services. They do have a few bilingual staff members that are made available should JCCI need assistance. While this solution may provide assistance for a few select languages, it is not perceived as sufficient for the PREA Standards. Jackson County is located just north of the metro Atlanta area, an area that is extremely diverse with a multitude of languages spoken.</p> <p>PREA posters and brochures are located throughout the facility in English and Spanish. The JCCI reports that there have been no instances in the past 12 months where resident interpreters have been used.</p> <p>Corrective Action Recommendation:</p> <p>Provide for translation services for a variety of languages. There are a variety of options available to include pay-as-you-go (use) and some free applications available.</p>

Update August 20, 2019: The facility has entered into a pay for use contract with As Astra Inc. for Interpretation services.

115.17	Hiring and promotion decisions
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. JCCI Local Operation Procedures (Hiring and Promotion Decisions, Interview Process and Hiring Interview Questionnaire) b. GDCO PREA Policy 208.06 c. Completed Pre-Audit Questionnaire submitted by JCCI d. Review of Random sample of personnel files e. Review of newly promoted or hired staff files <p>2. Interviews:</p> <ul style="list-style-type: none"> a. PREA Coordinator b. PREA Compliance Manager c. HR Administrative Staff <p>Findings:</p> <p>The GDOC PREA policy 208.06 prohibits the hiring, promotion or retention of any employee, volunteer or contractor that has the prohibited conduct specified in this standard. The policy requires the agency to consider any incidents of sexual harassment in determining whether to hire or promote staff or to enlist the services of a contractor that may have contact with residents. The JCCI conducts the required criminal history checks prior to hiring new employees who may have contact with residents. The policy requires the agency to use 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. The PREA policy requires criminal history checks before enlisting the services of a contractor who may have contact with residents. The GDOC PREA policy 208.06 requires criminal history checks on all employees at least every five (5) years. However, the JCCI conducts a criminal history background check on all staff annually.</p> <p>The GDOC/ JCCI has a policy and practice requiring the agency to provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for who such employee has applied to work. The facility provided copies of a form included with each application for new hires as proof documentation. The GDOC policy 208.06 imposes a continuing duty to disclose any misconduct listed in §115.17(a).</p> <p>The job application utilized by the JCCI inquires about prior convictions. The application asks applicants to disclose all criminal convictions and PREA related misconduct. The application clearly states that material misrepresentations or falsifications are grounds for termination of employment. The application includes material omissions as grounds for termination of employment.</p> <p>Corrective Action Recommendation:</p>

Document considerations of prior sexual abuse or sexual harassment for staff being considered for promotion.

Update 5/14/2019:

Agency has provided verification of completion of criminal background checks for prior sexual harassment and sexual abuse cases.

Update 8/20/2019:

The agency has provided proof documentation of the consideration of prior sexual abuse or sexual harassment for staff being considered for promotion.

115.18	Upgrades to facilities and technologies
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Jackson County Correctional Institute Local Policies b. Completed Pre-Audit Questionnaire submitted by JCCI c. JCCIP & Fire Department Security Map showing video camera locations d. Technology Upgrades for JCCI (video network upgrade and camera additions) 2018 <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Warden b. PREA Coordinator c. PREA Compliance Manager <p>Findings:</p> <p>The JCCI reports that there have been no acquisitions of new facilities or substantial expansions, modifications or renovation of the current Correctional Institute building. The facility, which encompasses the JCCI has both external and internal video camera monitoring. Cameras are strategically located on all external entrances/exits from the building and covering the inmate yard and outdoor area. Cameras internally are located in hallways, common areas (laundry, kitchen, property room), and entrances to building. Each JCCI dorms have two cameras in the living areas. The cameras have a visual on the dayroom areas, which have large windows. Cameras are placed in the dorm sleeping areas but inmates are advised to be dressed in these areas.</p> <p>There are no cameras in the shower/toilet areas. Policy further requires all camera equipment to be operational at all times. Video cameras are monitored 24/7 by the main control booth (Rotundra). The video network was upgraded in 2018 to enhance the system capabilities. The agency leadership considers a variety of factors when upgrading technology in the facility including primarily sight lines, blind spots, and inaccessible areas. Interviews with facility leadership indicate that placement of cameras and mirrors are discussed frequently to keep enhancing safety for all residents. The use of mirrors in addition to cameras to assist with blind spots has been implemented in the JCCI. It should be noted that there are cameras in the Isolation/Segregation cells, but there is technology used to blacken out the toilet area to allow the inmate to have privacy when using the toilet. There were several cameras that are inoperable (temporarily) due to some ongoing replacement of HVAC systems.</p> <p>Corrective Action Recommendation:</p> <p>Document how upgrade of cameras/technology may enhance the agency's ability to protect inmates from sexual abuse due to the cameras installed and enhanced in 2018.</p> <p>Update 5/14/2019:</p>

Agency has provided emails and letters to document the agencies attempt to protect inmates from sexual abuse by installing additional cameras and enhanced cameras in 2018.

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Jackson County Correctional Institute PREA Policy b. GDOC Policy 208.06 c. Completed Pre-Audit Questionnaire submitted by JCCI d. Review of Certificates of Training for Victim Advocates employed by JCCI e. GDOC SOP 103.10, Evidence Handling and Crime Scene Processing f. GDOC SOP 103.06, Investigations of Allegations of Sexual Contact, Sexual Abuse, Sexual Harassment of Offenders. <p>2. Interviews:</p> <ul style="list-style-type: none"> a. PREA Compliance Manager b, Global SANE Nurse c. No inmates were present that had reported sexual abuse to interview at the time of the audit. <p>Findings:</p> <p>The local Sexual Abuse Response Team (SART) is responsible for the administrative investigation of all allegations of sexual abuse or Sexual Harassment. The Sexual Allegation Response Checklist is completed for all PREA allegations. In cases where allegations are made against staff members and the SART inquiry deems the allegation is unfounded or unsubstantiated by evidence, the case can be closed at the facility level. If the allegation is criminal in nature, interviews are not conducted, nor are statements collected from the accused perpetrator without first consulting the Regional SAC. However, all initial reports of sexual abuse are forwarded to the Warden. The Warden may directly contact the Regional SAC to complete the investigation if preliminary review warrants.</p> <p>The JCCI investigator reports using the recommended uniform evidence protocol cited in this PREA standard and using SANE/SART services by a Global SANE nurse. The auditor contacted Global Diagnostics who informed the auditor that they no longer provide these services to the GADOC or JCCI. There are no surrounding rape crisis centers available; offenders who need counseling are transported to Phillips State Prison mental health counselors. JCCI does have a counselor who is a trained victim advocate.</p> <p>The Warden will assign the individual who conducts the internal investigation; all individuals conducting investigations must have previously received the special internal investigations training. A Lieutenant who is the Sexual Abuse Response Team (SART) investigator will normally complete the investigation. If the cursory review of evidence indicates that a criminal activity has occurred, the case is forwarded to the GDOC Investigators for completion.</p>

Corrective Action Recommendation:

Secure a SAFE or SANE to conduct forensic examination.

Document efforts to secure victim advocate services from rape crisis centers.

Update 8/20/2019:

The agency has provided an MOU with Phillips State Prison to provide SAFE/SANE forensic examinations and has secured an MOU with the Piedmont Rape Crisis Center to provide provide emotional support, crisis intervention, information, and referrals.

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none">a. Jackson County Correctional Institute LOPb. GDOC Policy 208.06c. Completed Pre-Audit Questionnaire submitted by JCCId. Jackson County Department of Corrections website: https://www.jacksoncountygov.com/183/PREA-Prison-Rape-Elimination-Acte. Sample internal investigations (2) <p>2. Interviews:</p> <ul style="list-style-type: none">a. Wardenb. PREA Coordinatorc. PREA Compliance Manager <p>Findings:</p> <p>The JCCI policy requires that all allegations of sexual abuse and sexual harassment be referred for investigation to appropriate law enforcement authorities. The Regional SAC, of the Georgia Bureau of Investigations is the law enforcement agency that conducts all criminal investigations at the JCCI. The JCCI's PREA policy is posted on the JCCI website at https://www.jacksoncountygov.com/183/PREA-Prison-Rape-Elimination-Act.</p> <p>The local Sexual Abuse Response Team (SART) is responsible for the administrative investigation of all allegations of sexual abuse or Sexual Harassment. The Sexual Allegation Response Checklist is completed for all PREA allegations. In cases where allegations are made against staff members and the SART inquiry deems the allegation is unfounded or unsubstantiated by evidence, the case can be closed at the facility level. If the allegation is criminal in nature, interviews are not conducted, nor are statements collected from the</p>

accused perpetrator without first consulting the Regional SAC.

The Warden will assign the individual who conducts the internal investigation; all individuals conducting investigations must have previously received the special Internal Investigations Training. The SART Investigator will complete the investigation.

Standard compliance was also demonstrated via interviews with the Warden, the PREA Coordinator and the PREA Compliance Manager.

The agency reports no allegations of sexual abuse or sexual harassment have been received in the past 12 months. There have been no criminal or administrative investigations in the past 12 months related to sexual abuse or sexual harassment. There were two sexual harassment complaints in the past 12 months.

Corrective Action Recommendation:

None

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. PREA Training at Lesson Plan for all GDOC and Contracted Facility Employees (Lesson Plan and PowerPoint 2019) d. Review of random staff personnel files e. Random sample of employee training records f. PREA Acknowledgement Form for employees <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Interviews with random staff regarding their PREA training and knowledge <p>Findings:</p> <p>The JCCI policy requires all new employees to have in-depth training on PREA and Sexual Harassment in the Workplace. Annual refresher training on PREA is also required for all employees. A review of the PREA training materials shows training on the ten specific topics found in the standard. The training was designed for both genders as the GDOC provides the training for all contracted facilities as well. The facility is responsible for providing in-service training that includes gender specific reference and training to staff as it relates to the specific population supervised. Staff members transferring into a facility of different gender from prior institution shall receive gender-appropriate training. The facility reports that all staff members have been trained on PREA. All staff is required to sign the PREA Acknowledgement Form stating they have received the PREA training and understand their responsibilities therein.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. PREA Training curriculum and materials for volunteers and contractors d. PREA Acknowledgement Form for Volunteers and Contractors <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Contractor b. Volunteer c. PREA Coordinator d. PREA Compliance Manager e. Warden <p>Findings:</p> <p>The agency's PREA policy requires all volunteers and contractors who may have contact with residents to be trained on PREA requirements. The training materials cover all the required topics. Volunteers receive orientation training, which includes the PREA policy and related topics. All volunteers and contractors are required to sign a PREA Acknowledgement Form that states that they have been trained on PREA and understand their obligations therein. The JCCI reports that 26 volunteers and contractors were trained in 2018. The facility has 6 volunteers (1-Medical, 1-technical instructor, 3-GED teachers, 1-pest control specialist) and 20 religious, AA and NA volunteers. One contractor was interviewed and compliance was found with this standard. One volunteer was interviewed and compliance was found with this standard. Each individual interviewed was familiar with the zero-tolerance policy and how to report an incident of sexual harassment or sexual abuse.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. PREA Acknowledgement Forms d. PREA Video Form e. JCCI Offender Handbook (January 2019) f. Orientation Checklist g. PREA Posters and Brochures posted and displayed in the facility h. Review of inmate files <p>2. Interviews</p> <ul style="list-style-type: none"> a. Random Sample of inmates b. Intake staff c. Staff who provides the comprehensive PREA training for residents d. PREA Coordinator <p>Findings:</p> <p>The JCCI reports that 295 offenders have been admitted in the past 12 months and all have been provided comprehensive age-appropriate information within 7 days of intake. All residents in the JCCI are provided PREA orientation materials at intake. Staff interviewed indicates that intake education normally happens on the first day the resident is admitted to the JCCI. They are provided the JCCI Handbook which includes the a section with PREA information. These documents provide detailed information about PREA, the agency’s zero tolerance policy, key definitions of certain conduct, how a youth can protect themselves, and how to report sexual abuse or harassment. This PREA standard requires that within 30 days of intake, residents must receive comprehensive education regarding PREA. The GDOC PREA policy 208.06 requires this additional education within 15 days, but interviews with staff that provide the comprehensive PREA education/orientation indicate this training is normally done with the first week after the offender enters the facility. The orientation includes a video and discussion of PREA. Upon completion of the training, offenders are required to take sign an acknowledgement of having received the training as well as an acknowledgment of having viewed the video. This documentation is maintained in the offender's file. The video shown has an option for subtitles for the hearing impaired. However, visually impaired offenders are not housed in this facility since it is a work camp. Inmates are screened and for disabilities before being transferred to this facility.</p> <p>Offenders sign the PREA Acknowledgement Statement form and the PREA Video form to demonstrate they have received PREA training and they understand their rights under PREA and specifically understand the ways they can report sexual abuse and sexual harassment. The facility ensures key information about PREA is continuously and readily available and visible to offenders. PREA posters were observed in every housing unit as well as common areas where inmates may spend some time such as the cafeteria, law library, programs area,</p>

etc. JCCI displays PREA posters in common areas of the facility with the abuse hotline number in bold print. Posters are displayed in English and Spanish.

Corrective Action Recommendation:

None

115.34	Specialized training: Investigations
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1374 701"> 1. Documents Reviewed: (Policies, directives, forms, files, records, etc.): a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. Training curriculum for PREA: Investigating Sexual Abuse in a Confinement Setting d. Training curriculum for PREA: Investigating Sexual Abuse in a Confinement Setting: Advanced Investigations e. Training curriculum for PREA: Medical Health Care for Sexual Assault Victims in a Confinement Setting f. Training documentation for staff completing the specialized training </p> <p data-bbox="252 757 651 999"> 2. Interviews: a. Investigative Staff b. PREA Coordinator c. PREA Compliance Manager d. Warden </p> <p data-bbox="252 1099 373 1133">Findings:</p> <p data-bbox="252 1182 1477 1559"> The JCCI SART Investigator performs a cursory investigation of all PREA Sexual abuse and sexual harassment complaints. Should he determine that a crime has likely been committed, he will advise the Warden who can then advise the Investigator to conduct the investigation or refer the investigation to a Special Agent in Charge (SAC). The SAC is an investigator who works for the Office of Professional Standards (OPS) who is responsible for any criminal investigation into a PREA allegation, should such investigation be deemed appropriate. All substantiated cases are referred for prosecution. Agency policy requires all investigators must complete specialized training for conducting investigations in confinement taught through the NIC. This training satisfies the basic requirement for this standard. </p> <p data-bbox="252 1570 1445 1686"> Training documentation is maintained for all individuals that have completed the specialized investigator training. The facility has one trained investigator. In the event the investigator is unavailable the Warden may request the SAC to complete the investigation. </p> <p data-bbox="252 1742 724 1776">Corrective Action Recommendation:</p> <p data-bbox="252 1827 325 1861">None</p>

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. PREA Training completed by medical staff <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Medical Staff b. PREA Coordinator c. PREA Compliance Manager <p>Findings:</p> <p>The JCCI has one Medical provider to provide on-site medical care at the facility. The nurse works full time at this facility. She has been known to come in on her day off and as needed to tend to patients. No sexual abuse examinations are conducted by the medical provider at the JCCI. The GDOC PREA policy requires all victims of sexual assault be transported to Via-Christi St. Joseph's Hospital. Forensic medical exams for any sexual abuse victims are conducted by a SANE/SAFE practitioner. Medical staff at the JCCI was provided in-depth PREA training and said training is documented via signed acknowledgement that receive the training. This facility does not provide mental health services on site. Inmates requiring mental health services are transferred to Phillips Correctional Institute in nearby Buford, GA for care and treatment. Phillips Correctional Institute is a state run correctional facility with mental health staff that have received PREA training through their agency.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.41	Screening for risk of victimization and abusiveness
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. Georgia Department of Corrections PREA Sexual Victim/Sexual Aggressor Classification Screening Instrument <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Staff that complete the Risk Screening Assessment b. PREA Coordinator c. PREA Compliance Manager <p>Findings:</p> <p>The GDOC policy requires that all offenders have an initial needs assessment/intake summary performed by a Counselor within 24 hours of entering the facility. This intake process utilizes a variety of assessment processes to gather information about the offender. The screening process is very thorough and gathers a significant amount of information that is used to determine the offender's needs. The JCCI reports that 293 offenders have entered the facility within the past 12 months and were screened as required by this standard.</p> <p>The Risk Screening instrument appropriately covers nine of the ten areas of information as detailed in this standard. The screening instrument does not reveal if the offender is being held solely for the purposes of civil immigration, however, this is a work camp strictly for housing criminally convicted offenders. There would not be an incident where an individual would be held solely for civil immigration purposes. Additional information received in the intake assessment through other screening instruments adds key information that is used to house offenders appropriately. The facility has implemented appropriate controls on the dissemination of the information received at intake. Only Counselors have immediate access to the screening instruments. PREA Coordinator and PREA Compliance Managers may gain access to the screening instrument by going to the counselors and requesting to see the instruments. Counselors conduct the screening and all files are kept locked in counselor's offices. A reassessment of the resident using the Screening Instrument is conducted within 30 days of intake for offenders.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.42	Use of screening information
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1193 360">1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> <li data-bbox="252 371 927 405">a. Georgia Department of Corrections Policy 208.06 <li data-bbox="252 416 995 450">b. Completed Pre-Audit Questionnaire submitted by JCCI <li data-bbox="252 461 1430 528">c. Georgia Department of Corrections PREA Sexual Victim/Sexual Aggressor Classification Screening Instrument <p data-bbox="252 584 427 618">2. Interviews:</p> <ul style="list-style-type: none"> <li data-bbox="252 629 951 663">a. Staff that complete the Risk Screening Assessment <li data-bbox="252 674 523 707">b. PREA Coordinator <li data-bbox="252 719 659 752">c. (PREA Compliance Manager <li data-bbox="252 763 676 797">d. Interview with LGBTQI Inmate <p data-bbox="252 842 371 875">Findings:</p> <p data-bbox="252 931 1477 1133">The GDOC PREA policy requires that all information gathered via the intake and assessment process be used to ensure appropriate classification and placement of the youth as well as any necessary security or protective precautions required to ensure a resident's sexual safety. Policy requires the facility staff to make individualized determinations of how to ensure the safety of each offender.</p> <p data-bbox="252 1189 1469 1346">The GDOC PREA policy 208.06 prohibits placing lesbian, bi-sexual, transgender or intersex clients in a particular housing/bed or other assignment solely on the basis of such identifier or status, and prohibiting considering LGTBI or status as an indicator of likelihood of being sexually abusive.</p> <p data-bbox="252 1357 1477 1693">The JCCI has reported they have had two LGBTI offenders in the program for the previous 12 months. JCCI only houses male residents. The PREA Compliance Manager indicates that if the JCCI ever receives an individual that is transgender or intersex, an independent determination based on the offenders risks/needs would be made at intake. Inmates are initially screened at the state level before being assigned to a county work camp. To date, JCCI has not housed a transgender inmate. If they were to receive a transgender inmate the inmate would be transferred to another facility or the inmate's needs would be accommodated at the JCCI.</p> <p data-bbox="252 1749 722 1783">Corrective Action Recommendation:</p> <p data-bbox="252 1827 323 1861">None</p>

115.43	Protective Custody
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1193 360">1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> <li data-bbox="252 371 927 405">a. Georgia Department of Corrections Policy 208.06 <li data-bbox="252 416 1286 450">b. Georgia Department of Corrections SOP 209.06, Administrative Segregation. <li data-bbox="252 461 994 495">c. Completed Pre-Audit Questionnaire submitted by JCCI <li data-bbox="252 506 1433 573">d. Georgia Department of Corrections PREA Sexual Victim/Sexual Aggressor Classification Screening Instrument <li data-bbox="252 584 970 618">e. Review of housing assignments of LGBTQI Offender <p data-bbox="252 674 427 707">2. Interviews:</p> <ul style="list-style-type: none"> <li data-bbox="252 719 954 752">a. Staff that complete the Risk Screening Assessment <li data-bbox="252 763 435 797">b. Intake Staff <li data-bbox="252 808 387 842">c. Warden <li data-bbox="252 853 523 887">d. PREA Coordinator <li data-bbox="252 898 651 931">e. PREA Compliance Manager <li data-bbox="252 943 695 976">f. Interview with LGBTQI Offender <p data-bbox="252 1021 371 1055">Findings:</p> <p data-bbox="252 1111 1477 1693">The GDOC PREA policy prohibits the placement of 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. In the past 12 months no inmates have been segregated in involuntary housing pending completion of assessment. GDOC policy prohibits offenders at high risk for sexual victimization or aggression from being placed in involuntary segregation based solely on that determination unless a determination has been made that there is no available alternative means of separation from likely abusers. Offenders placed in segregation will receive services in accordance with GDOC SOP 209.06, Administrative Segregation and be reviewed every 30 days to determine whether there is a continuing need for separation from the general population. Housing assignments of one LGBTQI offender was discussed and determined that individual was placed in the transition center based on his sentence and status as a work release inmate. The inmate advised that he has not been housed in any type of segregation housing.</p> <p data-bbox="252 1749 722 1783">Corrective Action Recommendation:</p> <p data-bbox="252 1827 323 1861">None</p>

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy: 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. Offender educational materials (Inmate handbook; PREA handout; posters, brochures) d. Orientation Checklist e. Inmate Handbook <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Random Sample of staff b. Random Sample of Inmates c. PREA Coordinator d. PREA Compliance Manager <p>3. Site review observations:</p> <ul style="list-style-type: none"> a. Testing of the PREA Hotline by auditor b. Tour of facility where abuse hotline number readily visible to offenders and staff through posters <p>Findings:</p> <p>The JCCI provides offenders multiple internal ways to report sexual abuse and sexual harassment, retaliation, and staff neglect. Offenders receive education about reporting at intake, through comprehensive PREA education within 10 days and through visible and available information in the facility at all times. The reporting methods include verbally telling a staff member, medical staff, volunteer, contractor, PREA Coordinator or the PREA Compliance Manager; calling the PREA hotline; submitting a written grievance; having a third-party submit an oral or written complaint on the individuals behalf; offenders may write a kite (informal written correspondence to supervisory staff). The facility provides offenders with access to tools necessary to make a written report. Some of the offenders in the JCCI work off-site and have access to report abuse to a wide variety of individuals outside the facility. Offenders are provided access to telephones in the facility. Pay phones are located around the facility. The telephone availability policy requires that the offender be allowed free access to the PREA Hotline. Offenders are also provided telephone number for County Inmates and Probationers to call to report an incident (1-888-992-7849), as well as contact information for the Statewide (GDOC) PREA Coordinator, Ombudsman (address and telephone number) and address information for the Director of Vicim Services. Offenders are provided this information about making reports (including anonymous reports) to the hotline in the inmate Handbook as well as through posters and brochures (in English and Spanish) located around the JCCI. JCCI provides these telephone numbers to offenders in a very visible manner. Staff at the JCCI may use this hotline to privately report abuse as well. There are no offenders in JCCI detained solely for civil immigration purposes. Interviews with offenders and staff clearly demonstrate that all are very knowledgeable about PREA and the variety of methods to report sexual abuse</p>

and sexual harassment. Offenders know exactly where the posters are located and how to call the abuse hotline. The auditor inquired if the offenders were provided free access to the telephone and offenders indicated they were provided access. Offenders also have access to a kiosk where they can email individuals allowing for more access.

Corrective Action Recommendation:

None

115.52	Exhaustion of administrative remedies
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1193 360">1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> <li data-bbox="252 371 1066 405">a. Georgia Department of Corrections Policies: 208.06, 227.02 <li data-bbox="252 416 995 450">b. Completed Pre-Audit Questionnaire submitted by JCCI <li data-bbox="252 461 820 495">c. JCCI Offender Handbook (January 2019) <li data-bbox="252 506 663 539">d. Review of Grievances (2018) <p data-bbox="252 584 427 618">2. Interviews:</p> <ul style="list-style-type: none"> <li data-bbox="252 629 1481 663">a. There were no offenders located on site that had filed an emergency grievance to interview. <p data-bbox="252 707 373 741">Findings:</p> <p data-bbox="252 797 1417 875">JCCI reported that there was one grievance regarding sexual abuse. The grievance was handled appropriately and timely according to PREA standards.</p> <p data-bbox="252 887 1485 1256">The agency has a formalized grievance policy. The Offender Handbook informs offenders of the grievance process. PREA standards require that no time limit be placed on the filing of grievances filed for sexual abuse or sexual harassment; the offender handbook allows for all sexual abuse and sexual harassment grievances to be filed without an imposed deadline. The GDOC grievance policy clearly states that grievance for sexual abuse can be filed anytime and there is no time limit. The PREA standards prohibit requiring an offender to use any informal grievance process or to have to try to resolve the grievance with staff first for allegations of sexual abuse. Offenders are not required to make an attempt to resolve all disputes or problems with staff or other offenders informally before filing a grievance.</p> <p data-bbox="252 1312 1474 1514">The JCCI policy provides for emergency grievances of a PREA incident where the resident is subject to a substantial risk of imminent sexual abuse that must be addressed within 48 hours and resolved within five days as required by the PREA standards. The emergency grievance procedures are clearly articulated in the grievance policy. Offenders have access to the Grievance Policy in the facility law library.</p> <p data-bbox="252 1570 724 1603">Corrective Action Recommendation:</p> <p data-bbox="252 1659 325 1693">None</p> <p data-bbox="252 1749 671 1783">Best Practice Recommendation:</p> <p data-bbox="252 1827 1442 1861">Provide information regarding emergency grievance procedures in the Offender Handbook.</p>

115.53	Inmate access to outside confidential support services
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policies: 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. Offender Handbook; PREA handout; posters, brochures <p>2. Interviews</p> <ul style="list-style-type: none"> a. Random sample of offenders b. PREA Compliance Manager c. Investigative Staff <p>Findings:</p> <p>The JCCI has had no reported allegations of sexual abuse in the past 12 months; thus, the auditor could not conduct any interviews of resident victims.</p> <p>According to the GDOC policy, the Institution PREA Compliance Manager, under the direction of the Warden/Superintendent, shall attempt to enter into agreement, or Memorandum of Understanding (MOU), with a rape crisis center to make available a victim advocate to offenders alleging sexual abuse/Sexual Harassment upon request. If the facility cannot do so, efforts must be documented and local staff shall be identified and specially trained to provide this service. Documentation of training must be maintained by the employee's manager and made available to the local PREA Compliance Manager upon request. The JCCI states that they have attempted to enter into an agreement for collaborative services with local victim advocacy programs to no avail. However, not documentation of these attempts were presented as evidence. The facility has two trained victim advocates on staff at JCCI. JCCI does not detain offenders solely for civil immigration purposes. The GDOC PREA policy requires the Sexual Assault Response Team (SART) to offer all victims of sexual assault the presence of a victim advocate during the forensic medical exam as well as crisis intervention counseling services.</p> <p>There are a variety of National Advocacy Services available to facilities nationwide. The National Sexual Assault Telephone Hotline can be contacted at 800.656.HOPE (4673), you'll be routed to a local RAINN affiliate organization based on the first six digits of your phone number.</p> <p>Corrective Action Recommendation:</p> <p>Attempt to locate outside victim advocacy services. If you are unable to secure these services, you must document your attempts to enter an agreement (MOU) with these agencies.</p> <p>Update 8/20/2019:</p> <p>The agency has entered into a memorandum of understanding with the Piedmont Rape Crisis Center to provide advocacy services to inmates.</p>

115.54	Third-party reporting
	<p data-bbox="252 275 898 309">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 353 523 387">Auditor Discussion</p> <p data-bbox="252 432 1193 465">1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> <li data-bbox="252 477 962 510">a. Georgia Department of Corrections Policies: 208.06 <li data-bbox="252 521 994 555">b. Completed Pre-Audit Questionnaire submitted by JCCI <li data-bbox="252 566 635 600">c. Review of Agency Website <li data-bbox="252 611 659 645">d. Review of Investigative Files <p data-bbox="252 689 427 723">2. Interviews:</p> <ul style="list-style-type: none"> <li data-bbox="252 734 667 768">a. Random sample of offenders <li data-bbox="252 779 651 813">b. PREA Compliance Manager <li data-bbox="252 824 515 857">c. Investigative Staff <p data-bbox="252 902 371 936">Findings:</p> <p data-bbox="252 992 1473 1115">The GDOC Grievance Policy allows third parties to assist the resident in filing a grievance that is PREA related. Offenders are provided information about the grievance process via the Inmate Handbook and the Grievance policy available in the law library.</p> <p data-bbox="252 1160 1457 1373">The Jackson County Correctional Institute website provides information on how to report sexual abuse and sexual harassment to the state PREA hotline or directly to the facility. Basic PREA information regarding zero tolerance and how to report an incident are found on the website at https://www.jacksoncountygov.com/183/PREA-Prison-Rape-Elimination-Act.</p> <p data-bbox="252 1462 722 1496">Corrective Action Recommendation:</p> <p data-bbox="252 1552 323 1585">None</p>

115.61	<p>Staff and agency reporting duties</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI <p>2. Interviews:</p> <ul style="list-style-type: none"> a. PREA Compliance Manager b. Warden c. Random sample of staff d. Medical staff. e. No mental health providers were interviewed as there are none assigned to this facility. <p>Findings:</p> <p>All JCCI staff are required to immediately report any suspected or alleged sexual abuse sexual harassment to the statutorily required entities per GDOC policy 208.06. The agency requires all staff to comply with mandatory reporting requirements applicable to the facility's licensing requirements. The GDOC's PREA policy states that retaliation will not be tolerated. Policy states that all PREA information is confidential in nature and shall only be released on a need-to-know basis. Staff are prohibited 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.</p> <p>Corrective Action Recommendation:</p> <p>None</p>
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115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy: 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Random sample of staff b. PREA Compliance Manager c. Interview with counselors who conduct intake screening and assessment d. Warden <p>Findings:</p> <p>The agency reports that there have been no situations in the past 12 months where the facility determined an offender was subject to substantial risk of imminent sexual abuse. Review of policy and interviews with the PREA Coordinator, PREA Compliance Manager, and a random sample of staff demonstrated the protective measures that would be taken in the event it was found that a resident was at imminent risk of sexual abuse.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy: 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI <p>2. Interviews:</p> <ul style="list-style-type: none"> a. PREA Compliance Manager b. Warden <p>Findings:</p> <p>The agency reports that in the past 12 months, the facility has received no allegations that a JCCI offender was abused while confined at another facility. The GDOC PREA policy clearly requires the JCCI facility Warden to report any abuse allegation received regarding a youth abused at another facility to the facility head where the sexual abuse is alleged to have occurred. Policy requires this notice to occur as soon as possible but no later than within 72 hours of receiving the allegation. The JCCI reports that in the past 12 months, the agency has received no notifications of sexual abuse from other facilities. Interviews with the facility Warden demonstrate compliance with this standard.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.64	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy: 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. Georgia Department of Corrections Sexual Allegation Response Checklist form d. Staff meeting roster (verification of training received) e. PREA Response Card <p>2. Interviews</p> <ul style="list-style-type: none"> a. Random Sample of Staff <p>Findings:</p> <p>The JCCI reports that in the past 12 months, there have been zero allegations that a resident was sexually abused. Thus, there were no victims available for interview by the auditor. Nor were there any first responder staff (security or non-security staff) to interview. The agency PREA policy requires the use of the Georgia Department of Corrections Sexual Allegation Response Checklist form when there is an incident of sexual abuse. GDOC policy requires that security staff first responders are required to:</p> <p>Notify your shift OIC and ensure the victim is separated from the aggressor. Instruct the alleged victim to refrain from changing clothes, drinking eating, brushing teeth or any other activity that could destroy physical evidence. If known, instruct the alleged perpetrator to refrain from changing clothes, drinking, eating brushing teeth or any other activity that could destroy physical evidence. Secure the crime scene if applicable to restrict access to the area and to prevent handling evidence until an internal investigator arrives.</p> <p>A non-security staff first responder is required to request the victim to not destroy evidence (as detailed in standard) and then notify a security staff member. Interviews with staff indicate that do not understand all of the the duties required of a first responder to the victim and abuser.</p> <p>Corrective Action Recommendation:</p> <p>Ensure that all security first responders are familiar with the four required responsibilities when responding to a sexual abuse claim. This could be reinforced through roll call training, scenario training or reinforcement of the PREA training.</p> <p>Recommended Best Practice:</p> <p>Provide all staff laminated first responder cards that detail the steps to be taken if a staff member is the first responder to an allegation of sexual abuse.</p>

Update 5/14/19:

Staff have been reissued laminated first responder cards and retrained during roll call training and staff meetings regarding their duties in responding to an incident.

Update 8/20/2019:

The agency has ensured that all security first responders are familiar with the four required responsibilities when responding to a sexual abuse claim. This could be reinforced through roll call training, scenario training or reinforcement of the PREA training.

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion 1. Documents Reviewed: (Policies, directives, forms, files, records, etc.): a. Georgia Department of Corrections Policy: 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. Coordinated Response Plan 2. Interviews: a. Warden Findings: The JCCI has developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse. This written plan is an excellent document that details the requirements of this standard. The Coordinated Response Plan provides sufficient detail about when or who contacts any needed rape crisis or crisis intervention advocates or mental health professionals for the victim. Corrective Action Recommendation: None

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy: 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Warden/Agency Head <p>Findings:</p> <p>The JCCI does not have any collective bargaining agreements in place and has not had any at any time. Jackson County is non-union and therefore has no union collective bargaining agreements. Thus, it was determined this standard is non-applicable.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy: 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Warden b. PREA Compliance Manager c. PREA Coordinator d. No Inmates were placed in Segregated Housing (for risk of sexual victimization/who allege to have suffered sexual abuse to interview e. No inmates who reported a Sexual Abuse were located in the facility <p>Findings:</p> <p>The JCCI reports that in the past 12 months there have been zero incidents of retaliation reported, known or suspected. The agency PREA policy clearly states that retaliation against any offender or staff member that reports sexual abuse or participates in an investigation is not tolerated. There have been no substantiated allegations of sexual abuse or sexual harassment so the auditor could not interview any alleged victims. The agency reports that the designated staff member charged with monitoring retaliation is the PREA Coordinator and that the requirements of this standard would be met in the event the JCCI has an allegation or suspicion of retaliation. Interviews with key leadership staff indicate the requirements of this standard would be met in the event the agency does gain knowledge, suspicion or an actual allegation of retaliation.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy: 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. There were no 30 day reviews to observe. <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Segregated Housing Unit Staff b. No inmates were available to interview that were placed in Segregated Housing (for risk of sexual victimization/who allege to have suffered sexual abuse <p>3. Site review observations:</p> <ul style="list-style-type: none"> a. Tour of the facility indicates there are a few Isolation/Segregation cells that are used for Administrative or Disciplinary purposes. <p>Findings:</p> <p>The JCCI has minimal segregation cells in the facility. GDOC policy mandates that offenders would only be placed in involuntary segregation when a determination has been made that there is no available alternative means of separation from likely abusers. In the event of a sexual abuse incident the alleged perpetrator would most likely be moved to another facility for secure housing.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.71	Criminal and administrative agency investigations
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1193 360">1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> <li data-bbox="252 371 928 405">a. Georgia Department of Corrections Policy 208.06 <li data-bbox="252 416 995 450">b. Completed Pre-Audit Questionnaire submitted by JCCI <li data-bbox="252 461 1469 528">c. Training records for select staff who have completed the Conducting Internal Investigations training <li data-bbox="252 539 1155 573">d. Review of training curriculum for Conducting Internal Investigations <p data-bbox="252 629 405 663">2. Interview</p> <ul style="list-style-type: none"> <li data-bbox="252 674 523 707">a. PREA Coordinator <li data-bbox="252 719 651 752">b. PREA Compliance Manager <p data-bbox="252 797 373 831">Findings:</p> <p data-bbox="252 887 1485 1178">The JCCI investigator is responsible for the administrative investigation of all allegations of sexual abuse or sexual harassment. In cases where the allegations are made against staff, and the investigator deems the case is unfounded or unsubstantiated, by evidence the case can be closed at the facility level. If the allegation is criminal in nature, an interview shall not be conducted, nor a statement collected from the accused perpetrator without consulting the Regional SAC. All Sexual Abuse penetration cases are directed to the Regional Director, Regional SAC and the PREA Coordinator upon receipt of the allegation for investigation.</p> <p data-bbox="252 1234 1453 1346">The JCCI has one individual who has received the specialized training for conducting sexual abuse investigations as required by PREA standard §115.34. I have reviewed his certificates of completion of training.</p> <p data-bbox="252 1402 1477 1514">The GADOC PREA policy 208.06 requires investigation notes on criminal and administrative cases be retained for as long as the alleged abuser is incarcerated or employed by the agency, plus five (5) years; or 10 years from the date of the initial report, whichever is greater.</p> <p data-bbox="252 1570 724 1603">Corrective Action Recommendation:</p> <p data-bbox="252 1659 325 1693">None</p>

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. Review of Investigative Files <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Investigative staff b. PREA Compliance Manager <p>Findings:</p> <p>The JCCI reports that they use the preponderance of the evidence for determining whether allegations of sexual abuse or sexual harassment are substantiated. Interviews with investigative staff confirm compliance with this standard.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. Review of completed investigations <p>2. Interviews</p> <ul style="list-style-type: none"> a. Investigative staff b. PREA Compliance Manager <p>Findings:</p> <p>The JCCI reports that there have been two criminal and/or administrative investigations of alleged resident sexual abuse or sexual harassment that were completed by the agency in the past 12 months. The auditor was reviewed the notification documentation for this standard. The auditor found the agency to be in compliance with the required notices. The agency's PREA policy is consistent with this PREA standard and interviews with investigative staff and facility manager confirm a practice that demonstrates compliance.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Investigative staff b. PREA Compliance Manager <p>Findings:</p> <p>The JCCI reports that in the past 12 months, there has been zero staff from the facility that have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies. Additionally, there has been zero staff in the past 12 months that have been disciplined for violations of the agency sexual abuse or sexual harassment policies. There has been zero staff that has been reported to law enforcement or licensing boards for violating agency policies. The agency PREA policy requires that staff be subject to disciplinary action up to and including termination of employment for violations of sexual abuse, sexual harassment or sexual misconduct. The agency Code of Ethics also requires disciplinary action up to and including termination for violations. The Georgia Department of Corrections PREA Policy provides that Staff members who engage in sexual abuse or Sexual Harassment of an offender will be subject to disciplinary action, up to and including termination and banishment from all Georgia correctional institutions, whichever action is applicable. Additionally, staff members who engage in sexual abuse of an offender will be subject to criminal prosecution. Pursuant to O.C.G.A. § 16-6-5.1, it is a felony for correctional staff to have sexual contact with an offender.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Investigative staff b. PREA Compliance Manager c. Warden <p>Findings:</p> <p>The JCCI reports that there have been zero contractors/volunteers reported to law enforcement or relevant licensing bodies in the past 12 months for engaging in sexual abuse of residents. Interviews with the facility warden indicate that the practice of the JCCI conforms to this standard.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. JCCI Inmate Handbook (January 2019) d. Investigative Reports <p>2. Interviews:</p> <ul style="list-style-type: none"> a. PREA Compliance Manager b. Warden c. Medical staff <p>Findings:</p> <p>The JCCI reports that in the past 12 months there have been zero administrative findings of resident-on-resident sexual abuse at the facility; additionally, the JCCI reports there have been zero criminal findings of guilt for inmate-on-inmate sexual abuse in the past 12 months.</p> <p>JCCI policy states that inmates may be disciplined for violations of this standard. The GADOC provides a formalized disciplinary policy surrounding sexual abuse and sexual harassment. Agency practice prohibits all sexual activity between offenders.</p> <p>The facility reports that offenders that commit PREA-related abuse or harassment would be removed from this facility and relocated to another facility within the state system. An offender's mental disabilities or mental illness would be considered if it contributed to the behavior when determining the sanction to be imposed. However, JCCI does not provide any Mental Health services at the facility. Inmates requiring Mental Health services would be transferred to the nearby Phillips State Prison. There have been no incidents where residents were disciplined for PREA-related conduct, the auditor could not interview anyone and no documentation exists to review.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Staff that complete Risk Screening Assessments b. Medical staff c. PREA Compliance Manager. <p>Findings:</p> <p>The JCCI reports that in the past 12 months, no inmates have disclosed prior victimization during screening; thus, no inmates were offered follow-up meetings with mental health practitioner. Agency policy requires the 14-day follow-up meeting with medical or mental health practitioner if sexual victimization or sexual perpetration is disclosed during screening at intake. Agency policies and practice ensure confidentiality of information received. On-site medical personnel provide informed consent disclosures. It should be noted that this is an Inmate Work Camp and this facility does not have on site Mental Health services. Inmates requiring Mental Health services would be transported to the Phillips State Prison located in nearby Buford, GA for mental health services.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Medical staff b. Regional SANE -Global Diagnostics <p>Findings:</p> <p>The JCCI reports no inmate victims of sexual abuse in the past 12 months; thus there were no medical records for this auditor to review for resident victims. Agency policy requires that inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. All victims are transported to the assigned medical catchment State Prison (Phillips State Prison) for SANE Nurse services. If the alleged assault occurred within 72 hours of the reported incident, and the offender does not require transport to the ER, the designated facility SANE Nurse shall be immediately notified and an appointment scheduled for the collection of forensic evidence. For sites without a designated or available SANE Nurse, a designated catchment facility, or the SANE is not available within a reasonable time frame, the Appointing Authority, in consultation with the Regional SAC, shall coordinate with the Office of Health Services (OHS) to arrange for the offender to be transported to a hospital for collection of the forensic evidence.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Medical staff b. PREA Coordinator <p>Findings:</p> <p>The agency has had no victims of sexual abuse in the past 12 months; thus, the auditor was not able to interview any inmate victims or review any corresponding documentation of practice. The facility is all male residents, so the pregnancy related services requirement of the standard is non-applicable. Agency policy requires that inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. All victims are transported to Phillips State Prison where the Forensic Nursing Program conducts SANE medical exams. Phillips State Prison ensures victims received rape crisis intervention services and advocates. Inmate victims of sexual abuse are offered tests for sexually transmitted infections (STI) as medically necessary and STI prophylaxis is offered to victims. Inmates would not be charged for any medical treatment required. Follow-up treatment for an inmate victim is coordinated by Phillips State Prison Medical and Mental Health staff who would continue to ensure the inmate gets the services (both medical and mental health as appropriate) they need and monitors their progress until they are released from custody.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. Investigative Files <p>2. Interviews:</p> <ul style="list-style-type: none"> a. PREA Compliance Manager b. PREA Coordinator c. Warden <p>Findings:</p> <p>The JCCI reports that in the past 12 months, there have been zero criminal and/or administrative investigations of alleged sexual abuse completed at the facility. Thus, the facility reports zero sexual abuse incident reviews were conducted. The agency's PREA policy establishes a formalized sexual abuse incident review team or process. Interviews with the PREA Coordinator and PREA Compliance Manager indicate a formal process exists with monthly reviews completed by the PREA Coordinator, SAIRT and leadership staff. A report that is prepared with recommendations, which are discussed with facility managers.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. Jackson County Correctional Institute Website: https://www.jacksoncountygov.com/Archive.aspx?AMID=36 d. Georgia Department of Corrections website: http://www.dcor.state.ga.us/Divisions/ExecutiveOperations/PREA e. Annual Reports f. Aggregated Data <p>2. Interviews:</p> <ul style="list-style-type: none"> a. PREA Compliance Manager b. PREA Coordinator <p>Findings:</p> <p>The agency collects accurate, uniform data for every allegation of sexual abuse at the JCCI facility. The facility uses a standardized instrument and set of definitions. The agency aggregates the data annually and submits the data to the State of Georgia through a computer program called Scribe. The State of Georgia prepares an annual report but this does not include information on JCCI.</p> <p>The PREA policy and practice requires the collection of the data per this standard. The agency completed a report for 2015 and posted it on their website. Reports for 2016, 2017 and 2018 were generate by the State of Georgia and posted on their website.</p> <p>Corrective Action Recommendation:</p> <p>None</p> <p>Best Practice Recommendation:</p> <p>Provide link on JCCI website to GADOC PREA Page that includes the annual reports or create a simply annual report just for JCCI and post on your own website.</p>

115.88	Data review for corrective action
	<p data-bbox="252 170 898 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1193 360">1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> <li data-bbox="252 371 927 405">a. Georgia Department of Corrections Policy 208.06 <li data-bbox="252 416 995 450">b. Completed Pre-Audit Questionnaire submitted by JCCI <li data-bbox="252 461 1449 573">c. First annual PREA aggregated data report for calendar year 2015 for the Jackson County Correctional Institute posted on the agency website at : https://www.jacksoncountygov.com/Archive.aspx?AMID=36 <li data-bbox="252 584 636 618">d. Updated Website (8/20/19) <p data-bbox="252 674 427 707">2. Interviews:</p> <ul style="list-style-type: none"> <li data-bbox="252 719 651 752">a. PREA Compliance Manager <li data-bbox="252 763 523 797">b. PREA Coordinator <li data-bbox="252 808 384 842">c. Warden <p data-bbox="252 887 371 920">Findings:</p> <p data-bbox="252 976 1465 1223">The agency's PREA Coordinator reports that the first annual report was produced in January 2015. Interviews with the Warden and PREA Coordinator demonstrate compliance with this standard. The auditor verified that the 2015 PREA Annual Report was posted on the Jackson County Correctional Institute website. The 2016 report is not accounted for but in 2017, the GADOC incorporated the annual reporting for each facility it contract with. However, it does not include an annual comparison for the JCCI facility.</p> <p data-bbox="252 1267 1422 1391">It should be noted that the report provided by the GADOC includes the annual number of allegations but does not provide a comparison for JCCI. The comparison is for all facilities managed and contracted with the GADOC.</p> <p data-bbox="252 1447 722 1480">Corrective Action Recommendation:</p> <p data-bbox="252 1536 1414 1648">Provide an annual comparison of JCCI statistics and include 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.</p> <p data-bbox="252 1704 671 1738">Best Practice Recommendation:</p> <p data-bbox="252 1794 1046 1827">Post a copy of JCCI aggregated reports on the JCCI website.</p> <p data-bbox="252 1883 464 1917">Update 8/20/19:</p> <p data-bbox="252 1973 1382 2040">The agency has updated their website to include a comparison of the number of cases investigated each year for comparison purposes.</p>

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. Georgia Department of Corrections Policy: 208.06 b. Completed Pre-Audit Questionnaire submitted by JCCI c. Georgia Department of Corrections website: http://www.dcor.state.ga.us/sites/default/files/2017%20GDC%20PREA%20ANNUAL%20REPORT.pdf d. Historical data, annual reports <p>2. Interviews:</p> <ul style="list-style-type: none"> a. PREA Compliance Manager b. PREA Coordinator c. Warden <p>3. Site review observations:</p> <ul style="list-style-type: none"> a. Secure office space where investigative files and PREA related files are stored. <p>Findings:</p> <p>The agency's PREA Coordinator reports that the first annual report was produced in 2016 covering cycle one. Interviews with the Warden and PREA Coordinator demonstrate compliance with this standard. GADOC policy 208.06 addresses the required records retention periods. All personal identifiers are removed before making aggregated sexual abuse data publicly available.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

115.401	Frequency and scope of audits
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none"> a. 2016 Audit Report b. Agency website of Audit and annual Reports <p>2. Interviews:</p> <ul style="list-style-type: none"> a. Random Sample of Inmates b. Random Sample of Staff c. Specialized Staff d. Targeted Inmates, where available <p>3. Site review observations:</p> <ul style="list-style-type: none"> a. Toured entire facility b. Camera placement in the facility c. Control station <p>Findings:</p> <p>The JCCI operates one facility. The JCCI was initially audited in 2016, during the third year of the first cycle. This audit was conducted in the third year of the second cycle. Since the JCCI is an independent county correctional institute, they should be conducting their audit the first year of the audit cycle. Globally, they are a contract facility for the Georgia Department of Corrections whereby they paid a sum of money for each day that they house state inmates. As an independent facility, they should shift their audits to the first year of the third cycle to be in full compliance of this standard.</p> <p>I provided full access to the facility for the purposes of the tour review. The Deputy Warden provided the tour and unlocked all secured access doors to allow me to visually observe all areas of the facility. This included all areas within the facility to include the inmate housing areas (4 dorms), recreation yard, storage, kitchen, law library, programs area, welding shed, and shake shack etc. I was provided with copies of all policies and granted access to review documentation of inmate records. I was permitted to copy or to request copies of all documents needed to conduct a thorough audit. Offenders were able to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel. I did not receive any letters from offenders at this facility. I was provided a private setting to offenders without interruption. Inmates and Staff interviewed were informed of the confidentiality of the audit. The facility provided me with photographic proof that the Notices of Audits was posted on January 2, 2019.</p> <p>Corrective Action Recommendation:</p> <p>None</p> <p>Best Practice Recommendation:</p>

Complete audit in the first year of the audit cycle.

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. Documents Reviewed: (Policies, directives, forms, files, records, etc.):</p> <ul style="list-style-type: none">a. Pre-Audit Questionnaire Completed by JCCIb. Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act (PREA) Sexually Abusive Behavior Prevention and Intervention Programc. Link to website https://www.jacksoncountygov.com/ArchiveCenter/ViewFile/Item/48 <p>2. Interviews:</p> <ul style="list-style-type: none">a. PREA coordinatorb. Warden <p>Findings:</p> <p>I have observed that the auditors PREA Final reports have been posted on the agency's public webpage. The posting for the JCCI can be found at https://www.jacksoncountygov.com/ArchiveCenter/ViewFile/Item/48.</p> <p>Corrective Action Recommendation:</p> <p>None</p>

Appendix: Provision Findings

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

115.11 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	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

115.11 (c)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	na
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes

115.12 (a)	Contracting with other entities for the confinement of inmates	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na

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

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

	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards?	yes
	In calculating adequate staffing levels and determining the need 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

115.13 (b)	Supervision and monitoring	
	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

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

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

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

115.14 (b)	Youthful inmates	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na

115.14 (c)	Youthful inmates	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na

115.15 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes

115.15 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes

115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes

115.15 (d)	Limits to cross-gender viewing and searches	
	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

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

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

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

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

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

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

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

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

115.17 (c)	Hiring and promotion decisions	
	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

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

115.17 (e)	Hiring and promotion decisions	
	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

115.17 (f)	Hiring and promotion decisions	
	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

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

115.17 (h)	Hiring and promotion decisions	
	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

115.18 (a)	Upgrades to facilities and technologies	
	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

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

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

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

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

115.21 (d)	Evidence protocol and forensic medical examinations	
	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

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

115.21 (f)	Evidence protocol and forensic medical examinations	
	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

115.21 (h)	Evidence protocol and forensic medical examinations	
	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

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

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

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

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

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

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

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

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

115.32 (b)	Volunteer and contractor training	
	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

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

115.33 (a)	Inmate education	
	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

115.33 (b)	Inmate education	
	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

115.33 (c)	Inmate education	
	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

115.33 (d)	Inmate education	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes

115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes

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

115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators 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

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

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

115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes

115.35 (b)	Specialized training: Medical and mental health care	
	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

115.35 (c)	Specialized training: Medical and mental health care	
	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

115.35 (d)	Specialized training: Medical and mental health care	
	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

115.41 (a)	Screening for risk of victimization and abusiveness	
	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

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

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

115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	no

115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, 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

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

115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to 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

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

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

115.42 (a)	Use of screening information	
	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

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

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

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

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

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

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

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

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

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

115.43 (d)	Protective Custody	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes

115.43 (e)	Protective Custody	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes

115.51 (a)	Inmate reporting	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes

115.51 (b)	Inmate reporting	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes

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

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

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

115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	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

115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes

115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	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

115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	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

115.52 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	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

115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes

115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	yes
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes

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

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

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

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

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

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

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

115.61 (e)	Staff and agency reporting duties	
	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

115.62 (a)	Agency protection duties	
	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

115.63 (a)	Reporting to other confinement facilities	
	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

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

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

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

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

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

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

115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	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

115.67 (a)	Agency protection against retaliation	
	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

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

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

115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes

115.67 (e)	Agency protection against retaliation	
	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

115.68 (a)	Post-allegation protective custody	
	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

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

115.71 (b)	Criminal and administrative agency investigations	
	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

115.71 (c)	Criminal and administrative agency investigations	
	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

115.71 (d)	Criminal and administrative agency investigations	
	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

115.71 (e)	Criminal and administrative agency investigations	
	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

115.71 (f)	Criminal and administrative agency investigations	
	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

115.71 (g)	Criminal and administrative agency investigations	
	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

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

115.71 (i)	Criminal and administrative agency investigations	
	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

115.71 (j)	Criminal and administrative agency investigations	
	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

115.71 (l)	Criminal and administrative agency investigations	
	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

115.72 (a)	Evidentiary standard for administrative investigations	
	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

115.73 (a)	Reporting to inmates	
	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

115.73 (b)	Reporting to inmates	
	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

115.73 (c)	Reporting to inmates	
	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

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

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

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

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

115.76 (c)	Disciplinary sanctions for staff	
	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

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

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

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

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

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

115.78 (c)	Disciplinary sanctions for inmates	
	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

115.78 (d)	Disciplinary sanctions for inmates	
	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

115.78 (e)	Disciplinary sanctions for inmates	
	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

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

115.78 (g)	Disciplinary sanctions for inmates	
	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

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

115.81 (b)	Medical and mental health screenings; history of sexual abuse	
	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

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

115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	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

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

115.82 (a)	Access to emergency medical and mental health services	
	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

115.82 (b)	Access to emergency medical and mental health services	
	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

115.82 (c)	Access to emergency medical and mental health services	
	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

115.82 (d)	Access to emergency medical and mental health services	
	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

115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	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

115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	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

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

115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	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

115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	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

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

115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	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

115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	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

115.86 (a)	Sexual abuse incident reviews	
	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

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

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

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

115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

115.87 (a)	Data collection	
	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

115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes

115.87 (c)	Data collection	
	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

115.87 (d)	Data collection	
	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

115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na

115.87 (f)	Data collection	
	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

115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes

115.88 (b)	Data review for corrective action	
	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

115.88 (c)	Data review for corrective action	
	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

115.88 (d)	Data review for corrective action	
	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

115.89 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes

115.89 (b)	Data storage, publication, and destruction	
	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

115.89 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes

115.89 (d)	Data storage, publication, and destruction	
	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

115.401 (a)	Frequency and scope of audits	
	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

115.401 (b)	Frequency and scope of audits	
	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.)	na

115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes

115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes

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

115.401 (n)	Frequency and scope of audits	
	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

115.403 (f)	Audit contents and findings	
	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. In the case of single facility agencies, the auditor shall ensure that the facility's last audit report was published. 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 that there has never been a Final Audit Report issued.)	yes