

# PREA Facility Audit Report: Final

**Name of Facility:** Washington County Justice Center

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 03/01/2023

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
<b>Auditor Full Name as Signed:</b> NATASHA MITCHELL	<b>Date of Signature:</b> 03/01/2023

AUDITOR INFORMATION	
<b>Auditor name:</b>	Mitchell, Natasha
<b>Email:</b>	nshaferdu@gmail.com
<b>Start Date of On-Site Audit:</b>	12/19/2022
<b>End Date of On-Site Audit:</b>	12/20/2022

FACILITY INFORMATION	
<b>Facility name:</b>	Washington County Justice Center
<b>Facility physical address:</b>	26861 U.S. 34 , Akron , Colorado - 80720
<b>Facility mailing address:</b>	

<b>Primary Contact</b>	
<b>Name:</b>	Ryan Stewart
<b>Email Address:</b>	rstewarts@co.washington.co.us
<b>Telephone Number:</b>	9703456865

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Robbie Furrow
<b>Email Address:</b>	rfurrow@co.washington.co.us
<b>Telephone Number:</b>	970 3456865

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	

<b>Facility Health Service Administrator On-site</b>	
<b>Name:</b>	Alysha Stewart
<b>Email Address:</b>	washingtonmedical@turnkeyhealthclinics.com
<b>Telephone Number:</b>	970 345 6865 ext 401

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	220
<b>Current population of facility:</b>	108
<b>Average daily population for the past 12 months:</b>	117
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>Which population(s) does the facility hold?</b>	Both females and males
<b>Age range of population:</b>	18 and up
<b>Facility security levels/inmate custody levels:</b>	Minimum, Medium, Maximum, Protective Custody
<b>Does the facility hold youthful inmates?</b>	No
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	38
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	12
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	3

<b>AGENCY INFORMATION</b>	
<b>Name of agency:</b>	Washington County Sheriff's Office
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	26861 Highway 34, Akron, Colorado - 80720
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

<b>Agency Chief Executive Officer Information:</b>	
<b>Name:</b>	Jon Stivers, Sheriff
<b>Email Address:</b>	jstivers@co.washington.co.us
<b>Telephone Number:</b>	970 345 6865

<b>Agency-Wide PREA Coordinator Information</b>			
<b>Name:</b>	Ryan Stewart	<b>Email Address:</b>	rstewart@co.washington.co.us

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

## POST-AUDIT REPORTING INFORMATION

### GENERAL AUDIT INFORMATION

#### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2022-12-19
2. End date of the onsite portion of the audit:	2022-12-20

#### Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	The auditor contacted the Administrator of the SARA's House who indicated the agency has a Memorandum of Understanding with the Washington County Sheriff's Office to provide advocacy and support services to inmates who experienced sexual abuse in the facility or if they require support from a previous experience. The auditor did not test the system while onsite; however, the auditor received documentation that demonstrates the inmates have the ability to call the hotline and the call is not recorded or monitored by the facility.

### AUDITED FACILITY INFORMATION

14. Designated facility capacity:	220
15. Average daily population for the past 12 months:	117
16. Number of inmate/resident/detainee housing units:	11

<p><b>17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)</p>
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## Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit

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

<p><b>36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b></p>	<p style="text-align: center;">19</p>
<p><b>38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</b></p>	<p style="text-align: center;">0</p>
<p><b>39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</b></p>	<p style="text-align: center;">1</p>
<p><b>40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</b></p>	<p style="text-align: center;">0</p>
<p><b>41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</b></p>	<p style="text-align: center;">0</p>

<p><b>42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>6</p>
<p><b>43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>3</p>
<p><b>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>1</p>
<p><b>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</b></p>	<p>The auditor interviewed ten (10) inmates; five (5) male inmates and five (5) female inmates. The auditor utilized the inmate roster that was provided prior to the on-site to identify the inmates to interview.</p>

## **Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit**

<b>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</b>	21
<b>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b>	3
<b>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b>	12
<b>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</b>	The has contracts with the following agencies for services within the facility: Trinity Services Food Service, TurnKey Health, Jail Based Treatment, and Centennial Mental Health.

## **INTERVIEWS**

### **Inmate/Resident/Detainee Interviews**

#### **Random Inmate/Resident/Detainee Interviews**

<b>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	10
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<p><b>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b></p>	<p><input checked="" type="checkbox"/> Age</p> <p><input checked="" type="checkbox"/> Race</p> <p><input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</p> <p><input checked="" type="checkbox"/> Length of time in the facility</p> <p><input type="checkbox"/> Housing assignment</p> <p><input checked="" type="checkbox"/> Gender</p> <p><input type="checkbox"/> Other</p> <p><input type="checkbox"/> None</p>
<p><b>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b></p>	<p>The auditor worked with the PREA Coordinator utilizing the inmate roster to identify the characteristics of the nineteen (10) inmates who were residing in the facility at the time of the on-site audit.</p>
<p><b>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p><b>a. Explain why it was not possible to conduct the minimum number of random inmate/resident/detainee interviews:</b></p>	<p>The minimum number of random inmates was not interviewed during the on-site audit due to a few inmates declining to participate.</p>
<p><b>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b></p>	<p>No text provided.</p>
<p><b>Targeted Inmate/Resident/Detainee Interviews</b></p>	
<p><b>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>3</p>

As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".

<p><b>60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The auditor worked with the PREA Coordinator to inmates with specific characteristics or who would fall into the targeted population category. The auditor also asked if there were any inmates who might fall within specific categories of the targeted populations. The inmates confirmed there were no inmates with an obvious physical disability who were residing in the facility at the time of the on-site audit.</p>

<p><b>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>1</p>
<p><b>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The auditor worked with the PREA Coordinator to inmates with specific characteristics or who would fall into the targeted population category. The auditor also asked if there were any inmates who might fall within specific categories of the targeted populations. The inmates confirmed there were no blind or low vision inmates who were residing in the facility at the time of the on-site audit.</p>
<p><b>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The auditor worked with the PREA Coordinator to inmates with specific characteristics or who would fall into the targeted population category. The auditor also asked if there were any inmates who might fall within specific categories of the targeted populations. The inmates confirmed there were no deaf or hard-of-hearing inmates who were residing in the facility at the time of the on-site audit.</p>
<p><b>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>6</p>
<p><b>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The auditor worked with the PREA Coordinator to inmates with specific characteristics or who would fall into the targeted population category. The auditor also asked if there were any inmates who might fall within specific categories of the targeted populations. The inmates confirmed there were no inmates who identified as lesbian, gay, or bisexual who were residing in the facility at the time of the on-site audit.</p>
<p><b>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The auditor worked with the PREA Coordinator to inmates with specific characteristics or who would fall into the targeted population category. The auditor also asked if there were any inmates who might fall within specific categories of the targeted populations. The inmates confirmed there were no inmates who identified as transgender or intersex who were residing in the facility at the time of the on-site audit.</p>
<p><b>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</b></p>	<p>0</p>

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The auditor worked with the PREA Coordinator to inmates with specific characteristics or who would fall into the targeted population category. The auditor also asked if there were any inmates who might fall within specific categories of the targeted populations. The inmates confirmed there were no inmates who reported sexual abuse while in the facility. The auditor also reviewed incident reports and none of the inmates who experienced sexual abuse or sexual harassment at WCSO were residing in the facility during the on-site audit.</p>
<p><b>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</b></p>	<p>1</p>
<p><b>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</b></p>	<p>0</p>

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The auditor worked with the PREA Coordinator to inmates with specific characteristics or who would fall into the targeted population category. The auditor also asked if there were any inmates who might fall within specific categories of the targeted populations. The inmates confirmed there were no inmates in segregated housing/isolation during the on-site audit.</p>
<p><b>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>No text provided.</p>

## Staff, Volunteer, and Contractor Interviews

### Random Staff Interviews

<p><b>71. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>5</p>
<p><b>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b></p>	<p><input type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input type="checkbox"/> Work assignment</p> <p><input type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>

<p><b>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p><b>a. Select the reason(s) why you were unable to conduct the minimum number of RANDOM STAFF interviews: (select all that apply)</b></p>	<p><input type="checkbox"/> Too many staff declined to participate in interviews.</p> <p><input checked="" type="checkbox"/> Not enough staff employed by the facility to meet the minimum number of random staff interviews (Note: select this option if there were not enough staff employed by the facility or not enough staff employed by the facility to interview for both random and specialized staff roles).</p> <p><input checked="" type="checkbox"/> Not enough staff available in the facility during the onsite portion of the audit to meet the minimum number of random staff interviews.</p> <p><input type="checkbox"/> Other</p>
<p><b>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b></p>	<p>During the on-site audit, the facility employed eight (8) security staff. The auditor interviewed the three (3) first shift staff and the overnight staff.</p>
<p><b>Specialized Staff, Volunteers, and Contractor Interviews</b></p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p><b>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b></p>	<p>5</p>
<p><b>76. Were you able to interview the Agency Head?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>



<b>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>78. Were you able to interview the PREA Coordinator?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>79. Were you able to interview the PREA Compliance Manager?</b>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

	<input checked="" type="checkbox"/> Intake staff <input type="checkbox"/> Other
<b>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of CONTRACTORS who were interviewed:</b>	2
<b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input checked="" type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
<b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	No text provided.

# SITE REVIEW AND DOCUMENTATION SAMPLING

## Site Review

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

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

Yes

No

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

**85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?**

Yes

No

**86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?**

Yes

No

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

Yes

No

<p><b>88. Informal conversations with staff during the site review (encouraged, not required)?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p><b>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</b></p>	<p>No text provided.</p>

## Documentation Sampling

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

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

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

## Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

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

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

# Sexual Abuse and Sexual Harassment Investigation Outcomes

## Sexual Abuse Investigation Outcomes

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

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

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

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

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

## Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	0	0	0	2
<b>Staff-on-inmate sexual harassment</b>	0	0	0	1
<b>Total</b>	0	0	0	3



# Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

## Sexual Abuse Investigation Files Selected for Review

<b>98. Enter the total number of SEXUAL ABUSE investigation files reviewed/sampled:</b>	0
<b>a. Explain why you were unable to review any sexual abuse investigation files:</b>	The facility did not receive any allegations of sexual abuse in the past 12 months prior to the onsite audit. Also, the facility has not received any allegations of sexual abuse since the onsite or during the reporting writing phase of the audit.
<b>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)
<b>Inmate-on-inmate sexual abuse investigation files</b>	
<b>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b>	0
<b>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)

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

<p><b>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>0</p>
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<p><b>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
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<p><b>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
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**Sexual Harassment Investigation Files Selected for Review**

<p><b>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>3</p>
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<p><b>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
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## Inmate-on-inmate sexual harassment investigation files

**108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:**

2

**109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?**

Yes

No

NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

**110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?**

Yes

No

NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

## Staff-on-inmate sexual harassment investigation files

**111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:**

1

**112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?**

Yes

No

NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)

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

## SUPPORT STAFF INFORMATION

### DOJ-certified PREA Auditors Support Staff

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

<p><b>116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>a. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:</b></p>	<p>1</p>

# AUDITING ARRANGEMENTS AND COMPENSATION

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

- The audited facility or its parent agency
- My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)
- A third-party auditing entity (e.g., accreditation body, consulting firm)
- Other

## **Standards**

### **Auditor Overall Determination Definitions**

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

### **Auditor Discussion Instructions**

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

**115.11**

**Zero tolerance of sexual abuse and sexual harassment; PREA coordinator**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Sheriff's Office Policy 200
3. Washington County Sheriff's Office Policy 606
4. Washington County Sheriff's Office SOP.
5. Outline for prevention, detection, and response
6. Booking screening form
7. 2021 WCSO Sexual Assault Response Protocol
8. IV Washington County SOP Protocol
9. Washington County Sheriff's Office policy manual
10. Washington County Detention Center Flow Chart.
11. Agency Organizational Chart & Title of PREA Coordinator
12. JC flow chart.

Interviews:

PREA Coordinator  
PREA Compliance Manager

**115.11(a)-1**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The Washing County Sheriff's Office has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment. The policy sufficiently outlines the approach to preventing, detecting, and responding to sexual abuse and sexual harassment.
- The policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment.

**115.11(a)-3**

Compliance Determination

- The Washington County Sheriff's Office mandates zero tolerance toward all forms of sexual abuse and sexual harassment. Sexual abuse of an inmate and sexual harassment of an inmate are prohibited.

A. "Sexual abuse" includes—

1. Sexual abuse of an inmate by another inmate; and
2. Sexual abuse of an inmate by a staff member, contractor, or volunteer.

B. Definitions

1. "Inmate" means any person incarcerated or detained in the jail;
2. "Staff" means an agency employee;
3. "Contractor" means a person who provides services on a recurring basis pursuant to a contractual agreement with the agency; and
4. "Volunteer" means an individual who donates time and effort on a recurring basis to enhance the activities and programs of the agency.

C. Sexual abuse of an inmate by another inmate includes any of the following acts, if the victim does not consent, is coerced into such act by overt or implied threats of violence, or is unable to consent or refuse:

1. Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;  
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2. Contact between the mouth and the penis, vulva, or anus;
3. Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument; and
4. Any other intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or the buttocks of another person, excluding contact incidental to a physical altercation.

D. Sexual abuse of an inmate by a staff member, contractor, or volunteer includes any of the following acts, with or without consent of the inmate, detainee, or resident:

1. Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;
2. Contact between the mouth and the penis, vulva, or anus;
3. Contact between the mouth and any body part where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;



4. Penetration of the anal or genital opening, however slight, by a hand, finger, object, or other instrument, that is unrelated to official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;

5. Any other intentional contact, either directly or through the clothing, of or with the genitalia, anus, groin, breast, inner thigh, or the buttocks, that is unrelated to official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;

6. Any attempt, threat, or request by a staff member, contractor, or volunteer to engage in the activities described in paragraphs (1)-(5) of this section;

7. Any display by a staff member, contractor, or volunteer of his or her uncovered genitalia, buttocks, or breast in the presence of an inmate, detainee, or resident, and

8. "Voyeurism" by a staff member, contractor, or volunteer.

"Voyeurism" by a staff member, contractor, or volunteer means an invasion of privacy of an inmate by for reasons unrelated to official duties, such as peering at an inmate who is using a toilet in his or her cell to perform bodily functions; requiring an inmate to expose his or her buttocks, genitals, or breasts; or taking images of all or part of an inmate's naked body or of an inmate performing bodily functions.

E. "Sexual harassment" includes—

1. Sexual harassment of an inmate by another inmate; and
2. Sexual harassment of an inmate by a staff member, contractor, or volunteer.

F. Sexual harassment of an inmate by another inmate includes:  
Repeated and unwelcome sexual advances, requests for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by an inmate directed toward another.

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G. Sexual harassment of an inmate by a staff member, contractor, or volunteer includes:  
Repeated verbal comments or gestures of a sexual nature to an inmate by a staff member, contractor, or volunteer, including demeaning references to gender, sexually suggestive or derogatory comments about body or clothing, or obscene language or gestures.

#### **115.11(a)-4**

##### Compliance Determination:

- The policy includes language that details sanctions for those found to have engaged in sexual abuse and sexual harassment.

##### H. Sanctions for Individuals Found to have participated in Sexual Abuse or Harassment

###### 1. Disciplinary Sanctions for Staff [DO] Standards §115.76]

- a. Staff will be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.
- b. Termination will be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.
- c. Disciplinary sanctions for violations of Washington County Sheriff's Office policies relating to sexual abuse or sexual harassment (other than engaging in sexual abuse) will be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.
- d. 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, will be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

###### 2. Corrective Action for Contractors and Volunteers [§115.77]

- a. Any contractor or volunteer who engages in sexual abuse will be prohibited from contact with inmates and will be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.
- b. The Washington County Sheriff's Office will take appropriate remedial measures and will consider whether to prohibit further contact with inmates or banning from operating in the Jail in the case of any violation of Washington County Sheriff's Office sexual abuse or sexual harassment policies by a contractor or volunteer.

###### 3. Disciplinary Sanctions for Inmates [DO] Standards §115.78]

- a. Inmates will be subject to disciplinary sanctions pursuant to a formal disciplinary

process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.

b. Sanctions will be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.

c. The disciplinary process will consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

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d. If the Washington County Sheriff's Office is able to offer therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the Jail will consider whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.

e. The Washington County Sheriff's Office may discipline or charge criminally if appropriate, an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

f. For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred will not constitute falsely reporting an incident, even if an investigation does not establish evidence sufficient to substantiate the allegation.

115.11(b)

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The Detention Division is commanded by the Undersheriff whose primary responsibility is to provide general management, direction and control for the Detention Division. The Detention Division consists of the detention facility staff and Transport Sections, which is supervised by a captain and two lieutenants. The captain is designated as the PREA Coordinator, and one lieutenant has been designated as the PREA Compliance Manager.

**115.11(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The PREA Compliance Manager reports directly to the PREA Coordinator. The agency is currently experiencing leadership changes with the retirement of the former sheriff and captain. Prior to the captain's retirement she trained her replacement to take over and he was sufficiently trained to oversee PREA compliance and the entire audit process.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the agency and facility is fully compliant with this standard requiring a zero-tolerance policy toward sexual abuse and sexual harassment and the designation of a PREA Coordinator and PREA Compliance Manager. No corrective action is required.

**115.12****Contracting with other entities for the confinement of inmates**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Contracts for the confinement of inmates (16 Contracts)
3. Washington County Sheriff's Office Policy. 606
4. WCSO Memo

Interviews:

1. Administrative (Human Resources) staff

**115.12(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The auditor reviewed six contracts that WCSO has entered to for the confinement of inmates at their facility. WCSO contracts with the Colorado Department of Corrections, United States Marshals Service and Department of Homeland Security/ICE, which requires WCSO to allow the contractors to monitor compliance with the PREA standards. The language indicates WCSO will comply with the PREA Standards.
  - WCSO currently does not have inmates housed at other facilities.

**115.12(b)**

Compliance Determination:

- The facility had demonstrated compliance with this provision of the Standard because:
  - The agency contracting with WCSO may monitor their performance under the contract. WCSO is obligated to submit to the contracting agency with a copy of any final audit report that relates to or affects the agency's WCSO contracts with.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the agency is fully compliant with this standard regarding contracting with other entities for the confinement of inmates. No corrective action required.

**115.13 Supervision and monitoring**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Sheriff's Office Policy. 606
3. Facility staffing plan
4. Operation Guideline
5. Daily Population reports
6. WCSO Memo
7. Washington County Sheriff's Office Email
8. WCSO Outline, prevention and detection
9. WCSO SOP PAGE 5
10. WCSO unannounced round log

Interviews:

1. Undersheriff
2. PREA Coordinator
3. PREA Compliance Manager
4. Intermediate- or higher-level facility staff

**115.13(a)**

Compliance Determination:

- The facility is found to be in compliance with this provision of the standard because:
  - WCSO has a staffing plan in place that was reviewed and revised on March 3, 2022.
  - The staffing plan is predicated on average daily number of 220 inmates; however, the average daily number of inmates for the past twelve months is one hundred seventeen (117).
  - On the first day of the onsite audit there was 43 inmates being housed in the facility.

**115.13(b)**

Compliance Determination:

- The facility is in compliance with this provision of the standard because:

- WCSO has developed a method to track and monitor deviations from the facility staffing plan. Each supervisor is required to complete a Staff Report Form, which is forwarded to the Captain for oversight. The supervisor is required to call the on-call supervisor to make notification and to get a replacement for the call-in when necessary. The supervisor is required to document the deviation from the staffing plan on the Washington County Staffing Report, and the report should be forwarded to the captain for signatures, or the Undersheriff if the captain is not available.
- A memo dated March 22, 2022, indicates, each time the staffing plan is not complied with, the facility documents and justifies all deviations from the Staffing Plan. The memo shows there have been zero deviations from the staffing plan. WCSO will call in other staff members to cover any shift if the staffing plan is not complied with, due to sickness or vacation.
- The facility did not have a period of time that the staffing plan was not complied with. Even during the national pandemic, the facility had to require the support from the administration staff to assist with compliance.

**115.13(c)**

Compliance Determination:

- The facility is found to be in compliance with this provision of the standard because:
  - WCSO conducted a staffing plan review on March 22, 2022. This was confirmed and verified through a staffing plan attendance form with representatives from the administrative level to support staff such as medical staff.

**115.13(d)**

Compliance Determination:

- The facility was not able to demonstrate compliance with this provision of the standard because:
  - The unannounced rounds are documented by supervisors. The documentation demonstrates the date, time, what areas of the facility the supervisor walked through, inmate count, and observations.
  - The WCSO policy prohibits staff members who are aware of these rounds from alerting other staff as to when or where these rounds are occurring, unless related to the legitimate operational needs of the facility.
  - Sergeants and Lieutenants are required to conduct unannounced rounds to identify and deter staff sexual abuse and sexual



harassment. The Control Operator is required to log and enter every location that they observe the Supervisor accessing.

- The unannounced rounds are required to be completed and documented twice every shift.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding supervision and monitoring. No corrective action is required.

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents reviewed:</p> <ol style="list-style-type: none"><li>1. WCSO PAQ</li><li>2. Agency Policy</li></ol> <p><b>115.14(a)</b></p> <p><u>Compliance Determination:</u></p> <ul style="list-style-type: none"><li>• The facility is in compliance with this provision of the Standard because:<ul style="list-style-type: none"><li>◦ Washington County does not house any inmates under the age of 18.</li><li>◦ Interviews with the Undersheriff and PREA Coordinator confirm the facility does not house youthful offenders.</li><li>◦ During the facility site review and inmate interviews the auditor determined the facility did not house youthful offenders.</li></ul></li></ul> <p>Conclusion:</p> <p>Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding youthful inmates. No corrective action is required.</p>

**115.15 Limits to cross-gender viewing and searches**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Protocol for Prevention, Detection, and Response  
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3. Outline for Prevention, Detection, and Response
4. PREA Memo dated March 23, 2022
5. Washington County SOP Protocol
6. Map and Log of cameras
7. 2022 List of Cameras
8. Universal Pat Searches
9. Training curriculum
10. Training Acknowledgment Forms

Interviews:

1. Non-Medical Staff Involved in Cross-Gender Strip or Visual Searches
2. Random staff (5 staff who represented the day and evening/overnight shifts)
3. Random Inmates

**115.15(a)**

Compliance Determination:

- The facility is in compliance with this provision of the Standard because:
  - The facility does not conduct cross-gender strip searches or cross-gender visual body cavity searches.
  - WCSO routinely utilizes the Nuctech Body Scanner in place of strip searches.

**115.15(b)**

Compliance Determination:

- The facility is in compliance with this provision of the Standard because:
  - The facility does not permit cross-gender pat-down searches of female inmates. If a female staff member is unavailable a female staff member will be called to the facility to run the female inmate through

the Nuctech Body Scanner.

- Interviews with the female inmates indicate their access to programming was not restricted due to comply with the provision.
- Interviews with male inmates report the female staff have the authority to conduct their pat search; however, there are typically male staff available to conduct their pat search. In those instances that a male staff is not available, the female staff will utilize the Nuctech Body Scanner.

**115.15(d)**

Compliance Determination:

- The facility is in compliance with this provision of the Standard because:
  - The inmates have the opportunity to show at any time of the day that the inmates are allowed out of their rooms. The inmates have more than 12 hours of programming per day.
  - The facility units are equipped with cameras; however, the cameras do not allow anyone who is in control of monitoring the cameras have the ability to view an inmate actively showering. The view on the camera is obscured by a black box.
  - Inmate interviews indicate the opposite gender announcements involve the staff member assigned to the control center will make an announcement over the intercom that a staff member of the opposite gender is entering the pod. The inmates all indicated they have adequate privacy when showering, using the restroom, and changing their clothes.

**115.15(e)**

Compliance Determination:

- The facility is in compliance with this provision of the Standard because:
  - The agency has language in the policy that prohibits the staff from physically examining an inmate who identifies as transgender or intersex for the sole purpose of determining the inmate's genital status.
  - The facility staff were well aware that in any instance that an inmate who identifies as transgender or intersex is admitted to the facility and their genital status is unknown, the staff shall ascertain the information through an interview. Additionally, they understand the inmate should be referred to medical staff who will gather additional information to help inform the facility's decision.

**115.15(f)**

Compliance Determination:

- The facility is in compliance with this provision of the Standard because:
  - The PAQ and training roster show 100% of the staff responsible for conducted searches have been trained.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is compliant with this standard regarding limits to cross-gender viewing and searches. No corrective action is required.

<b>115.16</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>
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**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Policy 602 & 606
3. SOP Protocol for Prevention, Detection, and Response
4. Contracts with interpreters
5. Staff Assistance
6. Posters/ Brochures/ Kiosk (English & Spanish)
7. Language Link
8. PREA Orientation

Interviews:

1. Sheriff
2. Intake staff
3. Inmates with special characteristics (2 Spanish speaking inmates, 1 inmate in mental health crisis)

**115.16(a)**

Compliance Determination:

- The facility is in compliance with this provision of the Standard because:
  - The agency has taken steps to ensure the inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities have an equal opportunity to participate from all aspects of the agency's effort to prevent, detect, and respond to sexual abuse.
  - The auditor interviewed three inmates who were identified as LEP, and one who was experiencing a behavioral health crisis.
  - Inmates who were LEP participated in an interview with the auditor with the assistance of the Language Link. Both inmates report that is the service utilized in the facility when they appear in virtual court. Also, the inmates report they have the ability to communicate with staff through the Kiosk system which has a translation feature.

**115.16(b)**

- The facility is in compliance with this provision of the Standard because:
  - The auditor observed PREA posters and education information in English and Spanish.
  - The auditor confirmed that the facility did not have an inmate residing in the facility who was deaf, blind or low vision.
  - The auditor conducted a private interview with the inmate who was in an active behavioral health crisis. The inmate did not have the capacity to respond to the auditor's questions there was evidence that they received the PREA information upon intake and had access to the facility's prevention and detection efforts.

**115.16(c)**

Compliance Determination:

- The facility is in compliance with this provision of this Standard because:
  - The PAQ indicates there were zero instances in the past 12 months where interpreters, readers or other types of inmate assistants have been used and it was not the case that in an extended delay in obtaining another interpreter could compromise the inmates safety, the performance of first-response duties or the investigation of the inmates allegations.
  - The auditor's interview with LEP inmates utilizing the translation service provider through what the auditor found to be a very easily accessible process suggest the services is readily available when needed.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding inmates with disabilities and inmates who are limited English Proficient. No corrective action is required.

**115.17 Hiring and promotion decisions**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County policies 108/901
3. WCSO Application
4. Job Posting
5. Washington County Sheriff's Office Memo
6. Washington County Policy 303
7. Washington County Policy 302
8. Washington County Application
9. Contract workers backgrounds.
10. List of Contract workers with Inmate contact
11. Memo reflecting change of policy
12. Roster of employees (More than five years background/criminal history with Records)
13. Evaluation Form
14. Volunteer Contract
15. Memo Regarding Release of Information

Interviews:

1. Administrative (Human Resources) staff

**115.17(a)**

Compliance Determination:

- The facility is in compliance with this provision of the Standard because:
  - All guidelines and procedures relating to the hiring or re-hiring of sworn and civilian employees are subject to change and are administered at the discretion of the Sheriff, Undersheriff or a designee of.
  - All new hires or promotions are screened for a history of engaging in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution. Their criminal history is also checked to ensure the new hire or employment seeking a promotion have not been convicted for engaging in or attempting to engage in



sexual activity.

- The auditor's interviews with random staff indicate they were required to agree with a background check that was conducted by the sheriff's office.

**115.17(b)**

Compliance Determination:

- The facility is in compliance with this provision of the Standard because:
  - The agency policy has language that states WCSO shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.
  - A review of WCSO detention applications indicate the agency does ask applicants about any convictions of engaging in or attempting to engage in sexual activity as well as any civil or administrative findings that the applicant engaged in sexual activity.

**115.17(c)**

Compliance Determination:

- The facility is in compliance with this provision of the Standard because:
  - Before hiring new employees, who may have contact with inmates WCSO will perform a criminal background record check for all candidates selected for employment.
  - The policy stated "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.
  - In the past 12 months, WCSO has hired nine (9) persons who may have contact with inmates who has a criminal background check completed.
  - The auditor reviewed the background clearance documentation that is maintained by WCSO for current employees.

**115.17(d)**

Compliance Determination:

- The facility is in compliance with this provision of the Standard because:
  - WCSO completes a criminal background record check before enlisting the services of any contractor who may have contact with inmates.

- In the past 12 months, WCSO has hired fourteen (14) individuals who provide contract services where a criminal background check was conducted.

**11517(e)**

Compliance Determination:

- The facility is in compliance with this provision of the Standard because:
  - WCSO conducts background checks every five years for current employees.

**115.17(g)**

Compliance Determination:

- The facility is in compliance with this provision of the Standard because:
  - WCSO application has a language on their employment application that says, "I acknowledge and understand that untruthful answers or deliberate omissions may be cause for disciplinary action up to and including termination (for employees) or termination of services (for contractors or volunteers).

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding inmates with disabilities and inmates who are limited English Proficient. No corrective action is required.

**115.18 Upgrades to facilities and technologies**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Cidnet Contact Broadcast System
3. HomeWAV Video Visitation and Phones
4. Kubl Intercom Audio Recording
5. Kubl Replace and Analog with IP Cameras
6. Kubl Replacement Failing Cameras
7. Nuctech Body Scanner
8. Smart Communication Tablets
9. Timekeeping Systems Guard

Interviews:

1. Sheriff
2. Undersheriff

**115.18(a)**

Compliance Determination:

- The facility is in compliance with this provision of the Standard because:
  - The agency does not have any plans in the next three years to acquire a new facility or expand the existing facility.
  - The facility leaders consider the facility design when making staffing decisions and inmate housing decisions.

**115.18(b)**

Compliance Determination:

- The facility is in compliance with this provision of the Standard because:
  - WCSO contracted with KUBL Group to install the Encartele's Cidnet Content Broadcasting System. KUBL also replaced fifty-three (53) aging analog cameras with 2MP IP cameras, which is intended to enhance camera viewing and reliability.
  - WCSO increased the video storage to maintain 45 days of video

storage.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the agency and facility is fully compliant with this standard regarding upgrades to facilities and technologies. No corrective action is required.

**115.21**

**Evidence protocol and forensic medical examinations**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County SOP Protocol V. Responding F. Investigations sec v-f  
Washington County Policy 901.5
3. Washington County Policy 901.3
4. MOU with SARA House
5. Washington County MOU with Morgan County
6. Reporting Posters and Brochures (English and Spanish)

Interviews:

1. PREA Coordinator
2. PREA Compliance Manager
3. Medical staff
4. SANE (SARA House)
5. Random staff

**115.321(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO is responsible for conducting investigations that involve allegations of sexual abuse.
  - WCSO conducts administrative investigations.
  - WCSO partners with Morgan County which is a neighboring county to conduct criminal investigations.
  - WCSO has an agreement with the Colorado Department of Corrections (CDOC) to conduct criminal investigations that involve DOC inmates.
  - Morgan County investigators utilize evidence protocols consistent with the standards established within local law enforcement agencies.

**115.21(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO does not house juveniles or youthful offenders within the facility.

**115.21(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO has a Memorandum of Understanding with the SARA House.
  - WCSO will offer inmates access to the services provided by the SARA (Sexual Assault Response Advocate) House who will respond to the facility to conduct a SANE exam.
  - All SANE exams that are conducted by the SARA House have no cost associated to any victim.
  - The facility has not had to contact the SARA House in the past 12 months to have a SANE exam as a result of a sexual abuse allegation that occurred inside of the facility or in the community.

**115.21(d)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Advocacy support and crisis intervention services are also provided by a SARA House advocate who will accompany the SANE nurse to the facility.

**115.21(e)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The MOU between WCSO and the SARA House states, SARA will meet with the survivor or victim as privately as possible, as soon as possible

after his or her arrival to the Washington County Medical Unit. The advocate will inform the survivor or victim of the right for a victim to be present during the medical forensic exam and the investigative interviews.

- The facility medical staff report that upon receiving a sexual abuse allegation they would immediately contact and make arrangements with SARA House regarding a sexual assault forensic exam. Per the MOU, the SANE nurse would go to the WCSO medical unit to complete a forensic exam.
- An interview with a representative from SARA House state they would go to the jail as agreed upon to conduct a forensic exam in the facility medical clinic.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding evidence protocol and forensic medical examinations. No corrective action is required.

**115.22**

**Policies to ensure referrals of allegations for investigations**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Sample investigation reports of sexual abuse or sexual harassment.
3. Washington County Sheriff's Office Policy 901
4. Washington County SOP Protocol V. Responding, F. Investigation of Incidents
5. MOU with Morgan County

Interviews:

1. Sheriff
2. PREA Coordinator
3. Investigator
4. Five (5) Random Staff

**115.22(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The PREA Coordinator as one of his responsibilities is to ensure that an administrative investigation is completed. He is also responsible for ensuring Morgan County is or has been contacted to conduct criminal investigations.
  - The facility PAQ indicates they received eleven (11) allegations of sexual abuse and sexual harassment in the past 12 months. a review of the tracking system and in communication with the PREA Coordinator, the last time that the facility received a report that alleged sexual abuse or sexual harassment was in September 2021. The auditor reviewed incident reports from the past and found that there were no reports of sexual abuse or sexual harassment in the past 12 months.
  - The facility provided the auditor with seven (7) administrative investigation reports, which demonstrated all of the investigations were closed and resolved with a finding.



**115.22(b)**Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO has a policy that requires staff to report allegations of sexual abuse and sexual harassment to their immediate supervisor who will make the appropriate notification to the PREA Coordinator who will ensure that an investigation is conducted.
  - During random staff interviews, every staff member indicated they would make a report to their supervisor in any instance that they become aware of a sexual abuse or sexual harassment allegation.
  - During the interview with the WCSO investigator, he said it is the PREA Coordinator's practice to contact him directly to ensure he has the report that alleges an inmate experienced sexual abuse or sexual harassment while residing in the facility.
  - The agency policy regarding allegations of sexual abuse and sexual harassment is published on the WCSO website at:  
<https://washingtoncountysheriff.colorado.gov/resources/policies>

**115.22(d)**Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO is a county agency is not required to adhere to this provision of the Standard.

**115.22(e)**Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO is a county agency is not required to adhere to this provision of the Standard.

**Conclusion**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding policies to ensure referrals of allegations for investigations. No corrective action is required.

**115.31 Employee training**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Policy 901
3. PREA Training Curriculum
4. Guidance in Cross-Gender and Transgender Pat Searches
5. PREA Refresher Flyers
6. Signed Acknowledgment Forms

Interviews:

1. PREA Coordinator
2. Five (5) Random staff
3. Medical and Mental Health staff

**115.31(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The WCSO policy requires that all employees, volunteers and contractors who may have contact with detainees shall receive training on the prevention and detection of sexual abuse and sexual harassment within the facility.
  - The training curriculum includes:
    - The Office’s zero-tolerance policy and detainees right to be free from sexual abuse and sexual harassment, and from retaliation for reporting sexual abuse or harassment.
    - The dynamics of sexual abuse and harassment in confinement settings, including which detainees are most vulnerable.
    - The right of detainees and staff members to be free from sexual abuse and sexual harassment, and from retaliation for reporting sexual abuse or harassment.
    - Detecting and responding to signs of threatened and actual abuse.

- Communicating effectively and professionally with all detainees.
- Compliance with relevant laws related to mandatory reporting of sexual abuse to outside authorities.
- Random staff interviews and a review of the training acknowledgement forms demonstrate the facility provides all new hires and current employees with PREA training.
- A review of the PowerPoint training curriculum shows every training module is included in the required training. WCSO has adopted the training curriculum developed by the PREA Resource Center

**115.31(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO houses male and female inmates; therefore, the training is tailored to meet the unique needs of men and women.

**115.31(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Washington County will provide training information quarterly to all employees and contract employees about current policy are, regarding sexual abuse and harassment.
  - Employees also receive monthly DBTs on policies through Lexipol on Washington County policy, including PREA.
  - Refreshers will be sent out to all employees and contract employees four times a year.
  - Washington County also provides eight hours of PREA training yearly.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility fully compliant with this standard regarding employee training. Training is conducted annually, all employees receive training tailored to the unique needs and attributes of inmates of both genders, and refresher training is available on an ongoing basis. No corrective action is required.

**115.32 Volunteer and contractor training**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Training curriculum for volunteers and contractors
3. Medicals PREA policy
4. Training curriculum from 115.32 (a)-1
5. Washington County Memo.
6. Signed Acknowledgment Forms

Interviews:

1. PREA Coordinator
2. PREA Compliance Manager
3. Volunteers and contractors

**115.32(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - All employees, volunteers and contractors who may have contact with detainees shall receive training on the prevention and detection of sexual abuse and sexual harassment within this facility. The Undersheriff shall be responsible for developing and administering this training as appropriate.
  - WCSO provided a list of volunteers and contractors (Trinity Services, TurnKey Health, Centennial Mental Health, and Jail Based Treatment) who provide services in the facility.
  - The TurnKey Health is the contract provider responsible for providing medical services in the facility. All TurnKey employees who have access to the inmates within the facility are required to receive and complete PREA training.

**115.32(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - At the conclusion of the volunteer and contractor training they participants are required to sign a training acknowledgement form stating they read and have received PREA information and understand the information dealing with how to prevent and report sexual misconduct, sexual violence and sexual abuse and will abide by all policies accordingly.
  - Volunteers and other contract providers sign a separate training acknowledgment form that explains their responsibility as a volunteer and contractor regarding PREA and the WCSO zero-tolerance policy.
  - Interviews confirm volunteers and contractors are trained on their responsibilities regarding sexual abuse and sexual harassment prevention, detection and response policies and procedures. The level and type of training provided to volunteers and contractors is based on the services those individuals provide and the level of contact they have with inmates.

**115.32(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The acknowledgement form states, the volunteer has received training on Prison Rape Elimination Act (PREA) from the Washington County Justice Center PREA Coordinator. By signing this document, I am verifying that I understand the training that has been received and my affirmative duty to report.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding volunteer and contractor training. No corrective action is required.

**115.33 Inmate education**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Inmate handbook (English and Spanish)
3. PREA Orientation
4. Inmate Education Acknowledgement Form (English and Spanish)
5. Signed Inmate Education Acknowledgement Form
6. Washington County SOP Protocol
7. Inmate education materials (posters brochures)
8. Memo

Interviews:

1. PREA Coordinator
2. PREA Compliance Manager
3. Five Random Inmates

**115.33(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO has a policy that requires the facility to provide inmate with PREA information during intake.
  - The facility admitted seven hundred thirty-one (731) inmates during the past 12 months who were given PREA information during intake.

**115.33(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Four hundred ninety-six (496) inmates admitted to WCSO in the past 12 months received comprehensive PREA education. They receive the information during intake and they have access to the PREA video throughout their stay on the inmate tablets.

**115.33(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Every resident in the facility has PREA knowledge that they received during intake.

**115.33(d)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO provides inmates with education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills.
  - Inmates informed the auditor that they receive written PREA information and watch a video. The video has caption that provides the information for an inmate identified as deaf or hard of hearing. The video also has the capacity to educate inmates with limited reading capacity.
  - Washington County Sheriff's Office will maintain documentation of inmate participation in these education sessions.
  - WCSO ensures that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats.
  - During the WCSO site review, the auditor observed PREA posters throughout the facility. Inmate interviews confirm that the posters are always visible.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding inmate education. No corrective action is required.

115.34	Specialized training: Investigations
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents reviewed:</p> <ol style="list-style-type: none"><li>1. WCSO PAQ</li><li>2. Investigator PREA Training Curriculum from Broomfield</li><li>3. Investigator PREA Training Curriculum from Broomfield</li><li>4. Washington County Policy 901.9</li><li>5. Training Records maintained in Personnel File</li></ol> <p>Interviews:</p> <ol style="list-style-type: none"><li>1. PREA Coordinator</li><li>2. Investigator</li></ol> <p><u>Compliance Determination:</u></p> <ul style="list-style-type: none"><li>• The facility has demonstrated compliance with this provision of the Standard because:<ul style="list-style-type: none"><li>◦ The investigator has completed the annually PREA training and specialized training as an investigator.</li><li>◦ WCSO provided a training certificated for the investigator.</li><li>◦ The auditor reviewed the investigator's investigation reports since the last PREA audit and found the investigator conducts a thorough investigation that includes interviews and collecting physical evidence.</li></ul></li></ul> <p>Conclusion: Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding specialized training for investigations. No corrective action is required.</p>



**115.35 Specialized training: Medical and mental health care**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. Agency Policy
2. Medical & Mental Health specialized training curriculum memo
3. Relevant Training records
4. Medical staff list
5. Training roster
6. Washington County Sheriff's Office Memo
7. Training logs
8. Training logs from 115.31 & 115.32

Interviews:

1. PREA Coordinator
2. Medical and mental health staff

**115.35(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - TurnKey Health medical practitioners are responsible for providing and arranging for the health interventions when the facility receives a report that alleges an inmates experienced sexual assault while they are residing in WCSO.
  - The facility medical personnel are not authorized to conduct forensic medical exams; therefore, there are no SANE certified nurses who are required to participate in the training requirements for a SANE nurse.
  - The TurnKey staff have participated in the required specialized training for medical staff.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding specialized training for medical and mental health care. No corrective action is required.

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

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PREA
2. Washington County SOP Protocol page 7
3. Medical Inmate Form
4. Initial Health Intake Screen Form
5. Washington County Vulnerability/Victimization/And or Sexually Aggressive Behavior
6. Assessment form
7. Washington County Policy
8. Records of reassessments of inmates within 30 days of arrival to facility
9. WCSO Policy

Interviews:

1. PREA Coordinator
2. PREA Compliance Manager
3. Intake staff
4. Random inmates

**115.41(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO has a policy that requires screening for risk of sexual victimization or sexual abusiveness toward other inmates.
  - The auditor did not have the ability to observe an inmate intake; however, during inmate interviews the auditor utilized the inmate interview protocol to gather information about the facility's intake process. The inmates communicated that the facility gathered information about the inmate to determine their risk for sexual victimization or offending.
  - The PREA Coordinator provided the auditor with the completed risk screening assessment for inmates currently residing in the facility.

**115.41(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Every inmate admitted to the facility will be screened for risk for sexual victimization immediately upon intake. Most screens are completed within the first hour of the inmates admission to the facility.

**115.41(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
- WCSO utilizes an objective screening assessment.

**115.41(d)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The auditor reviewed the screening assessment and observed that the tool gathers information about the inmates mental, physical, and developmental disability, age of the inmate, physical build of the inmate, previous incarcerations, inmate's criminal history, prior convictions that involves a sexual offense, an inmates sexual orientation and gender identity, and the inmate's perception of their vulnerability.
  - The facility does not detain inmates solely for the civil immigration purposes.

**115.41(f)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - When the facility receives additional information that might impact an

inmate's risk for victimization score the facility will screen the inmate to include the new information.

- WCSO conducted on re-assessment for an inmate based on information about the inmates gender identity.

**115.41(g)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO's policy requires an inmate's risk level be reassessed when there is a referral, request, incident of sexual abuse, or the facility receives additional information that would impact the risk of victimization or abusiveness.

**115.41(h)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO's policy prohibits disciplining inmates for refusing to respond to any of the questions on the screening tool.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding screening for risk of victimization and abusiveness.

**115.42 Use of screening information**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Vulnerability Assessment Instrument: Risk of Victimization and or Sexually Aggressive Behavior or Risk form
3. Washington County Sheriff’s Office policy
4. Housing Assessment
5. Washington County Memo
6. E-FORCE medical

Interviews:

1. PREA Coordinator
2. PREA Compliance Manager
3. Intake staff

**115.42(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO utilizes the information from the risk screening to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.
  - Upon completion of the Booking process and the Initial Intake Form, the booking officer contacts the Sergeant or Supervisor for assistance if there is information obtained that screens the individual as a high risk. In this case the housing and program decisions will be left up to the Sergeant or Supervisor.

**115.42(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO makes individualized determinations about how to ensure the

safety of each inmate.

- Currently the facility is operating with two out of five housing units. One pod for each of the gender; therefore, male identifying inmates are housed on one unit and female identifying inmates are housed on another unit.
- The staff utilize the screening tool to determine appropriate cell assignments. Inmates identified as high risk for victimization are not housed next to inmates identified as high risk to offend.

**115.42(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO makes housing and program assignment decisions for inmates who identify as a transgender on a case-by-case basis.
  - The PREA Coordinator provided documentation to demonstrate how the facility responded in the past to an inmate's request who identified as transgender. In that case the inmate requested to be housed in general population with the male inmates. Additionally, the inmate requested to have pat down searches conducted by female staff member and to wear undergarment designated for the female inmates.

**115.42(g)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The facility does not have housing that is specifically designated for inmates who identify as lesbian, gay, bisexual, transgender, or intersex.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding use of screening information. No corrective action is required.

**115.43 Protective Custody**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Policy
3. Segregation List
4. Administrative Segregation Weekly Review

**115.43(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO has a policy in place that states, "Inmates at high risk for sexual victimization shall not be placed in *involuntary segregated housing* unless an assessment of all available alternatives has been made, and a determination has been made that there is *no available alternative* means of separation from likely abusers. If the facility is unable to conduct an assessment, the facility can only hold an inmate in involuntary segregated housing for no more than 24 hours while completing the assessment.
  - During the site review, the auditor observed that cells in the facility that are designated for segregated housing were unoccupied.
  - The facility PAQ indicates in the past 12 months the facility did not house any inmates in involuntary segregation for any period of time due to risk of victimization.

**115.43(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The WCSO policy requires that when an inmate is placed in involuntary segregated housing due to being identified as high risk for sexual victimization should have access to program, privileges, education and work opportunities to the extent possible.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding protective custody. No corrective action is required.



**115.51 Inmate reporting**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Sheriff's Office Policy
3. Relevant documentation
4. PREA posters in the booking area and units
5. PREA Tri-fold Brochures
6. Documentation of verbal reports within 24hrs in accordance to Washington County Standard Operating Procedure
7. Washington County Justice Center Policy
8. Memorandum of Understanding with Yuma County
9. Department of Homeland Security Poster

Interviews:

1. PREA Compliance Manager
2. Random staff
3. Random inmate
4. Two Inmates who are Limited English Speaking

**115.51(a)(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO provides inmates with several ways for inmates to make sexual abuse and sexual harassment reports to agency officials. Inmates can make a report directly to the Washington County Sheriff's Office, the Yuma County Sheriff's Office, or the District Attorney's Office. Reporting to a third party, such as a friend or family member who can make a report on the inmates behalf as instructed on the agency website. WCSO provides inmates detained solely for civil immigration with the contact information for the Department of Homeland Security.
  - Inmates are made aware of the reporting mechanisms that's posted in the intake area of the facility as well as on the housing units. Also, all inmates receive a brochure during intake
  - The auditor tested the Homewav, which is the telephone device the inmates would use to call the Washing County Sheriff's Office and the

Yuma County Sheriff's Office to make a confidential report that could be referred back to the facility. Both numbers were answered by a employee working in the dispatch center.

- Inmates have access to the Smart Communications system to make a report through the agency's electronic grievance system.

**115.51(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - During staff interviews each understood their responsibility to accept reports made verbally, in writing, and anonymously. Staff shall document any verbal report within 24 hours.

**115.51(d)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Staff can take a jail report number and document the incident in a written report, and give the report to a Jail Administrator to privately report sexual abuse and sexual harassment of inmates.
  - Staff can remain anonymous in reporting a PREA incident by writing a report of said incident to the PREA Coordinator and the Investigator of the Washington County Sheriff's Office. This can be handwritten or typed using Microsoft word or by E-mail.
  - Staff are aware of the different private reporting mechanisms through trainings and by reviewing the agency policy.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding inmate reporting. Inmates are provided with numerous ways to report both internally and externally. No corrective action is required.

**115.52**

**Exhaustion of administrative remedies**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

- WCSO PAQ
- Washington County Detention Standard Operating Procedure
- Kiosk of PREA complaint
- Inmate handbook
- Washington County Sheriff's Office Memo

**115.52(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The PAQ reports that in the past 12 months, there have been zero grievances filed alleging sexual abuse. The inmates have the ability to file a grievance through the electronic Kiosk system.
  - The auditor tested the system by sending a test grievance and received documentation during the onsite audit to see how the supervisors receive the grievances. Once the form is electronically submitted the grievance is available for review by the supervisors and administrators for a response.
  - Grievances that allege sexual abuse or sexual harassment are typically referred to the PREA Compliance Manager and/or PREA Coordinator to address.

**115.52(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO does not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse.
  - WCSO does not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

**115.52(c)**Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - When an inmate who alleges sexual abuse they have the ability to submit a grievance without submitting it to a staff member who is the subject of the complaint.
  - When the facility administrators and supervisors receive a grievance that alleges sexual abuse, the grievance is immediately referred to the investigator to initiate an investigation.

**115.52(d)**Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO will issue a final decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.
  - The investigator indicated his investigations take far less than 90 days to complete and make a finding.

**115.52(e)**Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO has established the following method to receive third-party reports of sexual abuse and sexual harassment.
  - Third-party reporting information is available on the agency website.
  - 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. If the inmate declines to have the request processed on his or her behalf, Washington County Sheriff's Office will document the inmate's decision.
  - The facility did not receive any allegations of sexual abuse in the past 12 months.

**115.52(f)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO has established the following procedure for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse.
    - Verbal or written grievance to any Jail staff member or member of the Washington County Sheriff's Office.
    - Verbal or written notification to Victim Advocate of the Washington County Sheriff's Office.
    - Verbal or written notification to outside agency, or third party.
  - After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, Washington County Sheriff's Office shall immediately forward the grievance (or any portion of it that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken, shall provide an initial response within 48 hours, and shall issue a final decision within 5 calendar days.
  - The initial response and final decision shall document the Washington County Sheriff's Office determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

**115.52(g)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO may discipline an inmate for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the inmate filed the grievance in bad faith.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding exhaustion of administrative remedies. No corrective action is required.

**115.53 Inmate access to outside confidential support services**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Sheriff's Office Policy
3. Relevant documentation
4. PREA posters in the booking area and units
5. PREA Tri-fold Brochures
6. Documentation of verbal reports within 24hrs in accordance to Washington
7. County Standard Operating Procedure
8. Washington County Justice Center Policy
9. Memorandum of Understanding with SARA House
10. Memorandum of Understanding with Centennial Mental Health
11. Department of Homeland Security Poster

Interviews:

1. Random inmates

**115.53(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO has made the hotline numbers for Just Detention and the Department of Homeland Security available to the inmates for emotional support services.
  - The inmates can use the Homewav phone system to make confidential and anonymous calls if the inmate so chooses.
  - Every inmate receives a Homewav PIN number upon admission that will allow the inmate to dial the hotline number.
  - Legal calls as well as the hotline numbers are all privilege calls and are not recorded by the facility.

**115.53(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO maintains a memorandum of understanding with Centennial Mental Health and SARA House. Both are local agencies with the ability to provide emotional support services related to sexual abuse.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding inmate access to outside confidential support services and legal representation. No corrective action is required.

<b>115.54</b>	<b>Third-party reporting</b>
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**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

WCSSO PAQ

- Washington County Sheriff's Office Policy
- Copy Of MOU
- Publicly displayed sexual harassment policy on the Washington County Sheriff's Office web site
- Washington County Sheriff's Office we site [www.washcountysheriff.com](http://www.washcountysheriff.com)

**115.54(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSSO provided an MOU established with the Yuma County Sheriff's Office showing Yuma County agrees to accept third party reports of sexual abuse against inmates at the Washington County Justice Center. Yuma County will refer any and all information received to the Sheriff, or Undersheriff of Washington County Justice Center for proper investigation.
  - The auditor verified that the hotline number is answered by a live person and they will accept reports for WCSSO.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding third-party reporting. No corrective action is required.



**115.61 Staff and agency reporting duties**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

- 1. WCSO PAQ
- 2. Washington County Sheriff's Office Policy
- 3. Medical Policy
- 4. WCSO Memo

Interviews:

- 1. Undersheriff
- 2. PREA Coordinator
- 3. Medical and Mental Health Practitioner
- 4. Investigator

**115.61(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Staff are required to report the following:
    - Any staff member who has knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment; retaliation against inmates or staff who reported such an incident; and any staff neglect that may have contributed to such incident or retaliation, shall immediately report such incident or retaliation.
  - Interviews with staff indicate they will immediately make a report to their immediate supervisor or the supervisor on-duty when they have knowledge or suspect an inmate is being victimized, someone is being retaliated against for reporting or participating in an investigation, or if a staff member engaged in negligent behavior or a violated their job duties, which may have contributed to an inmate being victimized.

**115.61(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The staff understand that they expected to limit their communication about a reported incident and are prohibited from revealing information to persons who are not associated with investigating the allegation.
  - During one staff members interview with the auditor they indicated they were employed at a time when WCSO conducted a staff member who was accused of engaging in misconduct and the staff were unaware of the investigation or the outcome. The staff member explained that the administrative staff did a great job of protecting the inmate and former staff members confidentiality.

**115.61(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - During the interview with the medical practitioner, they indicated that during their first meeting with an inmate, they inform the individual about their duty to report misconduct and the limitations of confidentiality. The first meeting typically occurs within 24 hours of the inmate's admission.

**115.61(d)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO does not admit anyone under the age of 18 to the facility.
  - The auditor interviewed the youngest person admitted to the facility at the time of the onsite, and they were 21 years old.

**115.61(e)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO had an investigator who is responsible for conducting all PREA

allegations.

- The PREA investigator indicated they receive all PREA allegations almost immediately. They said, if the facility were to receive a report after business hours and the allegations were of a very serious nature, they would immediately respond to the facility to initiate the investigation.
- A review of the PREA related investigations indicate the investigator initiates their investigation almost immediately after the report was made.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding staff and agency reporting duties. No corrective action is required.

<b>115.62</b>	<p><b>Agency protection duties</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Documents reviewed:</p> <p>WCSO PAQ</p> <ul style="list-style-type: none"> <li>• Washington County Sheriff's Office Policy</li> <li>• WCSO Memo</li> <li>• E-force log</li> </ul> <p>Interviews:</p> <p>Sheriff</p> <ul style="list-style-type: none"> <li>• Undersheriff</li> <li>• Random staff</li> </ul> <p><b>115.62(a)</b></p> <p><u>Compliance Determination:</u></p> <ul style="list-style-type: none"> <li>• The facility has demonstrated compliance with this provision of the Standard because: <ul style="list-style-type: none"> <li>◦ When WCSO learns that an inmate is subject to a substantial risk of imminent sexual abuse, it will take immediate action to protect the inmate by separating the potential offender from the reporter.</li> <li>◦ The auditor reviewed documentation that demonstrated there were zero inmates placed in protective custody status.</li> <li>◦ The PREA Coordinator indicated when there is a risk of imminent sexual abuse an inmate will be separated by unit.</li> <li>◦ An inmate can be placed in protective custody, assigned to a single or double cell assignment, involuntary segregation.</li> </ul> </li> </ul> <p>Conclusion:</p> <p>Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding agency protection duties. No corrective action is required.</p>
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**115.63 Reporting to other confinement facilities**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Detention Center SOP
3. Washington County Protocol SOP
4. Washington County Sheriff's Office Policy 901
5. WCSO Memo
6. Sample Facility-to-Facility Report

Interviews:

1. Sheriff
2. Undersheriff

**115.63(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Upon WCSO receiving an allegation that an inmate was sexually abused while confined at another facility, the head of WCSO jail will notify the head of the facility or appropriate office of the agency where the alleged abuse occurred.
  - The notification will be provided as soon as possible, but no later than 72 hours after receiving the allegation.
  - When WCSO receives a notice that an inmate was sexually abused while confined at another facility, the head of the WCSO will notify the facility.
  - WCSO will notify the investigator who will generate a report and conduct an interview with the inmate. The inmate will then be referred to medical staff to assess the inmates medical and mental health needs.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding reporting to other confinement facilities. No corrective action is required.

**115.64 Staff first responder duties**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

- 1. WCSO PAQ
- 2. Washington County Sheriff's Office SOP
- 3. Documentation of responses to allegations
- 4. WCSO Memo
- 5. WCSO report on possible incident
- 6. Washington County Sheriff's Office Policy

Interviews:

- 1. Random staff

**115.64(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO established a policy that stated when there is a sexual assault allegation the staff are required to follow a timeline.
    - Jail Deputy First Responder:
      - 1. Notify Jail Administrator.
      - 2. Secure the crime scene and preserve evidence, including on the survivor's and perpetrator's bodies.
      - 3. Separate the survivor and alleged perpetrator(s).
      - 4. Offer the survivor the option to speak with a confidential rape crisis advocate confidentially by phone.
      - 5. If requested by the survivor, contact the advocate to set-up the confidential call in a private location.
      - 6. Request that the alleged survivor and perpetrator refrain from actions that could destroy physical evidence, such as bathing, brushing teeth, changing their clothes, urinating, defecating, smoking, drinking or eating until they have been examined by qualified medical personnel.

7. Escort the alleged inmate perpetrator(s) to an isolation cell and turn off the water until the arrival of law enforcement.

8. Complete an incident report.

- Staff are required to respond in a timely manner to preserve and protect the crime scene. The staff will secure the scene, which would require a different response according to the circumstances.
- Staff would seclude the victim from the offender and request that the victim not take any action that could destroy evidence and ensure that the alleged abuser does not take any actions that could destroy physical evidence.

**115.64(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - An interview with a medical practitioner indicated an alleged victim would immediately be escorted to the medical clinic. They would then coordinate with the supervisor and the security staff to ensure the alleged victim does not take actions that could destroy physical evidence.
  - The facility did not receive any allegations of sexual abuse in the past 12 months.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding staff first responder duties. No corrective action is required.

<b>115.65</b>	<b>Coordinated response</b>
	<p data-bbox="256 188 983 224"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 557 300"><b>Auditor Discussion</b></p> <p data-bbox="256 340 568 376">Documents reviewed:</p> <ol data-bbox="320 443 839 517" style="list-style-type: none"> <li>1. WCSO PAQ</li> <li>2. Sexual Assault Response Protocol</li> </ol> <p data-bbox="256 629 416 665">Interviews:</p> <ol data-bbox="320 732 748 891" style="list-style-type: none"> <li>1. Undersheriff</li> <li>2. PREA Coordinator</li> <li>3. PREA Compliance Manager</li> <li>4. Random staff</li> </ol> <p data-bbox="256 1003 413 1039"><b>115.65(a)</b></p> <p data-bbox="256 1079 647 1115"><u>Compliance Determination:</u></p> <ul data-bbox="331 1182 1453 1294" style="list-style-type: none"> <li>• The facility has demonstrated compliance with this provision of the Standard because: <ul data-bbox="437 1263 1203 1299" style="list-style-type: none"> <li>◦ Immediate Steps after Receiving Report of Incident:</li> </ul> </li> </ul> <ol data-bbox="349 1335 1356 1411" style="list-style-type: none"> <li>1. When a first responder learns that an inmate has been sexually abused, they shall take immediate action to protect the inmate.</li> </ol> <p data-bbox="418 1447 612 1482">This includes:</p> <ol data-bbox="349 1491 1372 1693" style="list-style-type: none"> <li>a. Separate the inmate from the alleged perpetrator;</li> <li>b. Preserve and protect any crime scene until appropriate steps can be taken to collect evidence; and</li> <li>c. If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim -</li> </ol> <p data-bbox="256 1697 1430 1859">- and ensure that the alleged abuser - - not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and</p> <ol data-bbox="338 1868 1299 2029" style="list-style-type: none"> <li>d. If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, the Jail Deputy shall immediately notify the appropriate medical and mental health practitioners.</li> </ol>



2. When the first staff responder is not a security staff member, they will request that the alleged victim not take any actions that could destroy physical evidence, and then notify a Jail Deputy.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding a coordinated response to an incident of sexual abuse. No corrective action is required.

<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents reviewed:</p> <ol style="list-style-type: none"> <li>1. WCSO PAQ</li> <li>2. Washington County SOP Protocol</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Undersheriff</li> <li>2. PREA Coordinator</li> </ol> <p><u>Compliance Determination:</u></p> <ul style="list-style-type: none"> <li>• The facility has demonstrated compliance with this provision of the Standard because: <ul style="list-style-type: none"> <li>◦ Nothing in this section will restrict Washington County Sheriff’s Office entering into or renewal of agreements that govern: <ol style="list-style-type: none"> <li>1. The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions in this policy relating to the standard of evidence for substantiating allegations of sexual abuse/harassment and disciplinary sanctions for staff, or</li> <li>2. Whether a no-contact assignment that is imposed pending the outcome of an investigation will be expunged from or retained in the staff member’s personnel file following a determination that the allegation of sexual abuse is not substantiated.</li> </ol> </li> </ul> </li> </ul> <p>Conclusion: Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding the preservation of ability to protect inmates from contact with abusers. No corrective action is required.</p>

**115.67 Agency protection against retaliation**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

1. Documents reviewed:
2. WCSO PAQ
3. Washington County Sheriff's Office: Standard Operation Procedure
4. WCSO memo

Interviews:

1. Sheriff
2. PREA Coordinator
3. Designated Staff Members Charged with Monitoring Retaliation

**115.67(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The WCSO policy is 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.
  - WCSO will 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.
  - WCSO has designated the facility shift supervisors or Lieutenant of each shift to monitor for any possible signs of retaliation.

**115.67(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The WCSO policy mandates for at least 90 days following a report of

sexual abuse, WCSO will monitor the conduct and treatment of inmates or staff who reported sexual abuse, and 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, and shall act promptly to remedy any such retaliation.

- Washington County Sheriff's Office will continue such monitoring beyond 90 days if the initial monitoring indicates an ongoing need.

Monitoring will include:

- a. Periodic in-person conversations with inmates and/or staff;
- b. Review of disciplinary incidents involving inmates;
- c. Review of housing or program changes; and
- d. Review of negative performance reviews or reassignments of staff.

**115.67(d)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - It is the policy of the Washington County Sheriff's Office to protect from retaliation all inmates and staff members who:
    - Report sexual abuse or harassment; or
    - Cooperate with sexual abuse or harassment investigations

The shift supervisor and Lieutenant will monitor for retaliation with periodic checks. The checks will be logged within the individual's log.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding agency protection against retaliation. No corrective action is required.

115.68	<p><b>Post-allegation protective custody</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Documents reviewed:</p> <ol style="list-style-type: none"> <li>1. WCSO PAQ</li> <li>2. Washington County Detention Facility SOP</li> </ol> <p><u>Compliance Determination:</u></p> <ul style="list-style-type: none"> <li>• The facility has demonstrated compliance with this provision of the Standard because: <ul style="list-style-type: none"> <li>◦ Any use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse can only be used until least restrictive options are available.</li> <li>◦ Segregated housing to protect an inmate cannot extend beyond 24 hours.</li> <li>◦ It is the policy of the Washington County Sheriff’s Office to protect from retaliation all inmates and staff members who: <ul style="list-style-type: none"> <li>• Report sexual abuse or harassment</li> <li>• Cooperate with sexual abuse or harassment investigations</li> </ul> </li> </ul> </li> </ul> <p>For at least 90 days following a report of sexual abuse, the Washington County Sheriff’s Office will monitor the conduct and treatment of:</p> <ul style="list-style-type: none"> <li>• Inmates or staff who reported sexual abuse; and</li> <li>• Inmates who were reported to have suffered sexual abuse</li> </ul> <p><u>Conclusion:</u> Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding post-allegation protective custody. No corrective action is required.</p>
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**115.71 Criminal and administrative agency investigations**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Detention Facility SOP
3. Investigative Report
4. Record retention schedule
5. WCSO Memo

Interviews:

1. Sheriff
2. PREA Coordinator
3. PREA Compliance Manager
4. Investigator
5. Staff who supervise inmates in segregated housing

**115.371(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO has a policy that is intended to ensure that allegations of sexual abuse or sexual harassment are referred for an investigation. WCSO conducts the allegation in any case where the allegation does not involve potentially criminal behavior.
  - WCSO documents every allegation that involves sexual abuse and sexual harassment.

**115.71(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:

- When the WCSO investigator conducts an investigation into allegations of sexual abuse and sexual harassment, the investigator will do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.

**115.71(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The WCSO investigator has received specialized training in sexual abuse investigations. The investigator indicated he participates in ongoing training with a focus on investigating sexual abuse allegations.
  - WCSO provided the auditor with specialized training certificate.
  - The investigators investigation will involve conducting staff and inmate interviews, reviewing videos, and review pertinent documentation to include prior allegations.
  - The WCSO investigator is a certified peace officer and has the ability to gather and preserve evidence related to the allegation.

**115.71(d)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Criminal investigations that involve WCSO employees, volunteers, contractors are conducted by the Morgan County Sheriff's Office, which is a neighboring county.
  - WCSO will support criminal prosecution and refer all criminal cases to the prosecutor.

**115.71(e)(f)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The credibility of an alleged victim, suspect, or witness will be assessed on an individual basis and will not be determined by the person's status as inmate or staff. WCSO does not require an inmate who alleges sexual abuse to submit to a polygraph examination or

other truth-telling device as a condition for proceeding with an investigation.

Administrative investigations:

a. Shall include an effort to determine whether staff actions or failures to act contributed to the abuse; and

b. Shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

Criminal investigations:

a. Shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible; and

b. Shall be referred for prosecution if there are substantiated allegations of conduct that appear to be criminal.

**115.71(i)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO retains all written reports for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.
  - The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation.
  - When the Morgan County Sheriff's Office conducts a criminal sexual abuse investigation WCSO will cooperate with the investigators and will remain informed about the progress of the investigation.

**115.71(e)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The departure of an alleged abuser (staff or inmate) will not result in the termination of an investigation.



- The investigator and PREA Coordinator talked about a non-PREA related report with allegations that involved an inmate that required the investigator to travel to the inmates location to conduct an interview.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding criminal and administrative agency investigations. No corrective action is required.

115.72	Evidentiary standard for administrative investigations
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents reviewed:</p> <ol style="list-style-type: none"><li>1. WCSO PAQ</li><li>2. Administrative Investigation</li><li>3. Washington County Sheriff's Office SOP</li></ol> <p>Interviews:</p> <ol style="list-style-type: none"><li>1. PREA Coordinator</li><li>2. Investigative staff</li></ol> <p>For administrative investigations, WCSO does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. If the alleged sexual abuse involves a staff member of the WCSO, volunteer, or contractor, Morgan County Sheriff's Office will conduct the criminal investigation.</p> <p>Conclusion: Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding evidentiary standard for administrative investigations. No corrective action is required.</p>

**115.73 Reporting to inmates**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Detention Center SOP
3. WCSO memo
4. Allegation report
5. Lexipol policy # 606
6. Email communication

Interviews:

1. Sheriff
2. Investigator

**115.73(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Following an investigation into an inmate's allegation that he or she suffered sexual abuse at while residing at WCSO, the investigator will inform inmate as to whether the allegation had a substantiated, unsubstantiated, or unfounded finding.
  - The auditor reviewed a letter that informed an inmate of the investigation finding from 2021.

**115.73(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Following an inmate's allegation that a staff member has committed sexual abuse against an inmate, WCSO will subsequently inform the inmate (unless it has determined that the allegation is unfounded)

whenever:

- a. The staff member is no longer posted within the inmate's unit;
  - b. The staff member is no longer employed at the facility;
  - c. The Washington County Sheriff's Office learns that the staff member has been charged with a crime related to sexual abuse within the facility; or
  - d. The Washington County Sheriff's Office learns that the staff member has been convicted on a charge related to sexual abuse within the facility.
- At the initiation of an investigation the PREA Coordinator or his designee will notify the inmate of the status of the alleged perpetrator.

**115.73(d)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Following an inmate's allegation that he or she has been sexually abused by another inmate, WCSO will subsequently inform the alleged victim whenever:
    - a. The Washington County Sheriff's Office learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
    - b. The Washington County Sheriff's Office learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.
  - WCSO did not have sample documentation given all of the reported allegations in previous years have been unfounded, and the facility did not receive any reports in the past 12 months.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding reporting to inmates. No corrective action is required.

**115.76 Disciplinary sanctions for staff**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Sheriff's Office policy
3. Washington County Sheriff's Office Policy 606
4. Washington County Sheriff's Office Policy 901
5. PREA Incident Report and Investigation Material
6. Washington County SOP Protocol
7. WCSO Memo

**115.76(a)(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Possible disciplinary sanctions for staff who engage in sexual misconduct can include termination if found to have violated the PREA policy.
  - Termination will be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.
  - The facility provided one incident report to demonstrate one staff member was disciplined and required to participate in training to address the behavior that was a sexual harassment violation.

**115.76(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The WCSO policy relating to sexual abuse or sexual harassment will be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.

**115.76(d)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - 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, will be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.
  - The facility terminated the employment of one staff member who violated the WCSO policy by engaging in a romantic relationship with an inmate that did not involve sexual contact.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding disciplinary sanctions for staff. No corrective action is required.

**115.77 Corrective action for contractors and volunteers**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Sheriff's Office SOP
3. WCSO Memo

Interviews:

1. Sheriff
2. PREA Coordinator
3. Investigator

**115.77(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The WCSO policy says if any contractor or volunteer who engages in sexual abuse will be prohibited from contact with inmates and will be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.
  - WCSO did not receive any reports against a contractor or volunteer that they violated the agency policy.

**115.77(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO will take appropriate remedial measures and will consider whether to prohibit further contact with inmates or banning from operating in the Jail in the case of any violation of Washington County Sheriff's Office sexual abuse or sexual harassment policies by a contractor or volunteer.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding corrective action for contractors and volunteers. No corrective action is required.



**115.78 Disciplinary sanctions for inmates**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

- 1. WCSO PAQ
- 2. Washington County Sheriff's Office SOP
- 3. WCSO Memo
- 4. Centennial Mental Health MOU
- 5. PREA booking acknowledgment

Interviews:

Undersheriff

- 1. Random staff
- 2. Random inmates

**115.78(a)(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO inmates are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.
  - There were no disciplinary sanctions imposed against an inmate for violating the PREA policy.
  - Sanctions will be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.

**115.78(d)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The disciplinary process will consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.
  - WCSO will offer therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the Jail will consider whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.

**115.78(e)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO may discipline or charge criminally if appropriate, an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

**115.78(f)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The WCSO policy prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred will not constitute falsely reporting an incident, even if an investigation does not establish evidence sufficient to substantiate the allegation.
  - Interviews confirm the WCSO prohibits sexual activity between inmates and staff.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding interventions and disciplinary sanctions for inmates. No corrective action is required.

**115.81**

**Medical and mental health screenings; history of sexual abuse**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Detention Center SOP
3. SHP 14 assessment form
4. WCSO Memo
5. SHP mental health assessment sheet
6. SHP policies and procedures pack
7. SHP mental health evaluation form
8. SHP release of offender mental health or substance abuse treatment information
9. Washington County Detention Center vulnerably/Victimization sexually behavior assessment

Interviews:

1. Medical and mental health staff
2. Investigative staff

**115.81(a)(b)(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The WCSO medical and mental health screenings determines if the screening indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.
  - Every inmate who is admitted to WCSO is screened by the medical staff upon within 24 hours even those without a reported sexual abuse history.
  - During the medical practitioner will ask the inmate if they have a history of sexual victimization. This process is the second time that an inmate is screened for sexual victimization during the intake process.

- The intake staff responsible for completing the risk screening interview confirmed that an inmate that has experienced prior sexual victimization, whether in an institution or in the community will be offered a follow-up meeting with a medical or mental health practitioner.

**115.81(d)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments.

**115.8(e)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The WCSO medical and mental health practitioners will obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting.
  - WCSO does not serve anyone under the age of 18; therefore, this does not apply.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding medical and mental health screenings; history of sexual abuse. No corrective action is required.

**115.82 Access to emergency medical and mental health services**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Detention Center SOP
3. SHP Policy and Procedures
4. WCSO memo

Interviews:

1. PREA Coordinator
2. Medical and mental health staff

**115.82(a)b**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Inmate victims of sexual abuse will 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.
  - When there is an allegation of sexual abuse an inmate is referred to a mental health practitioner for assessment and appropriate crisis intervention. Based on the results of the assessment, the mental health practitioner will develop a plan for on-going services.
  - During after-hours the supervisor contact the on-call administrator for guidance when there is an allegation of sexual abuse on an inmate. In most cases the on-call administrator will contact the medical practitioner and request an immediate response to the facility.

**115.82(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Inmate victims of sexual abuse while incarcerated shall be offered

timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

**115.82(d)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.
  - SANE exams and any other medical needs are provided at no cost to the victim. The WCSO will assume the cost.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding access to emergency medical and mental health services. No corrective action is required.

**115.83**

**Ongoing medical and mental health care for sexual abuse victims and abusers**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Detention Center SOP
3. SHP policy and procedure manual
4. WCSO Memo

Interviews:

1. Medical and mental health staff

**115.83(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The Washington County Sheriff's Medical Unit will offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in jail.
  - The auditor observed the medical clinic and the exam room where the SANE exam would be conducted. If additional services are necessary, the inmate would be transported to a local hospital.

**115.83(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.
  - Medical staff confirmed victims are given timely information and

access to all lawful pregnancy-related services if pregnancy results from sexual abuse while incarcerated.

- The Washington County Jail shall provide such victims with medical and mental health services consistent with the community level of care.

**115.83(d)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests.

**115.83(e)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - If pregnancy results from the conduct described in this section, victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services (such as prenatal care and access to pregnancy termination services, where available).

**115.83(f)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate.

**115.83(g)**



Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.
  - The WCSO clinic is equipped to provide a SANE exam to assess general health and to treat any physical injuries. The medical practitioner interviewed during the onsite audit confirmed sexual abuse victims would be offered timely information about access to emergency contraception and sexually transmitted infection prophylaxis.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding ongoing medical and mental health care for sexual abuse victims and abusers. No corrective action is required.

**115.86 Sexual abuse incident reviews**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

- 1. WCSO PAQ
- 2. Washington County Detention Center SOP
- 3. WCSO Memo

Interviews:

- 1. Undersheriff
- 2. PREA Coordinator
- 3. PREA Compliance Manager
- 4. Medical staff

**115.86(a)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - WCSO will 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.
  -

**115.86(b)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - In the past 12 months there were three criminal and/or administrative investigations of alleged sexual abuse completed in the facility there was followed by a sexual abuse incident review within 30 days.
  - Incident review documentation shows that the review occurs within 30 days of the conclusion of the investigation for all substantiated and unsubstantiated findings.

**115.86(c)**

Compliance Determination:

- The facility has demonstrated compliance with this provision of the Standard because:
  - The review team will include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.

**115.86(d)**

d. The review team will:

1. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;
  2. Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility;
  3. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;
  4. Assess the adequacy of staffing levels in that area during different shifts;
  5. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and
  6. Prepare a report of its findings, including determinations made pursuant to this section, and any recommendations for improvement and submit the report to the Sheriff and Jail Administrator/PREA Coordinator.
- e. The Washington County Sheriff's Office will implement the review team's recommendations for improvement or document its reasons for not doing so.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding sexual abuse incident reviews. No corrective action is required.

<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents reviewed:</p> <ol style="list-style-type: none"> <li>1. WCSO PAQ</li> <li>2. Washington County Detention Center SOP</li> <li>3. Set of definitions from the Washington County Detention Center policy</li> <li>4. SSV for the Department of Justice</li> <li>5. WCSO Memo</li> </ol> <p><b>115.87(a)</b>  Washington County Sheriff's Office, Standard Operating Procedures  A. Data Collection [DOJ § 115.87]</p> <ol style="list-style-type: none"> <li>1. The Washington County Sheriff's Office will collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.</li> <li>2. The Washington County Sheriff's Office will aggregate the incident-based sexual abuse data at least annually.</li> <li>3. The incident-based data collected will 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.</li> <li>4. The Washington County Sheriff's Office will maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.</li> <li>5. The Washington County Sheriff's Office also will obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates.</li> <li>6. Upon request, the Washington County Sheriff's Office will provide all such data from the previous calendar year to the Department of Justice no later than June 30.</li> </ol> <p>According to the PAQ and a review of the annual reports on the WCSO website, the agency collects data as needed from all available incident-based documents, including reports, investigation files and sexual abuse incident reviews.</p> <p><b>Conclusion:</b>  Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding data collection. No corrective action is required.</p>

**115.88 Data review for corrective action**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

1. WCSO PAQ
2. Washington County Detention Center SOP
3. WCSO Memo
4. Washington County Sheriff's Office Policy
5. WCSO website at: <http://washcountyjustice.com/prea/>

Interviews:

1. Sheriff
2. PREA Coordinator

**115.88(a)**

Washington County Sheriff's Office, Standard Operating Procedures

B. Data Review for Corrective Action [DO] § 115.88]

1. The Washington County Sheriff's Office will 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:

- a. Identifying problem areas;
- b. Taking corrective action on an ongoing basis; and
- c. Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.

2. Such report will include a comparison of the current year's data and corrective actions with those from prior years and will provide an assessment of the Washington County Sheriff's Office progress in addressing sexual abuse.

3. The Washington County Sheriff's Office report will be approved by the Washington County Sheriff or Undersheriff and made readily available to the public through its website or, if it does not have one, through other means.

4. The Washington County Sheriff's Office may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility but must indicate the nature of the material redacted.

Annual reports are published on the WCSO website at: <http://washcountyjustice.com/prea/>. Reports are published from 2018 through present. The reports are inclusive of annual data comparison and statistical analysis, corrective actions and policy

updates. All personal identifying information is redacted from the report prior to posting on the website.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding data review for corrective action. No corrective action is required.

**115.89 Data storage, publication, and destruction**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents reviewed:

- 1. WCSO PAQ
- 2. Washington County Detention Center SOP

Interviews:

- 1. PREA Coordinator

**115.389(a)**

Washington County Sheriff’s Office, Standard Operating Procedures  
C. Data Storage, Publication, and Destruction [DO] § 115.89]

- 1. The Washington County Sheriff’s Office will ensure that data collected pursuant to § 115.87 are securely retained.

WCSO ensures that incident-based and aggregate data are securely retained. This was corroborated by interviewing the PREA Coordinator. She stated the data is securely maintained and only a few employees have access. Furthermore, the auditor received all pre-on-site phase documents in a zip file through a secure email.

- 2. The Washington County Sheriff’s Office will make all aggregated sexual abuse data, from the Washington County Jail or an agency it contracts with to house inmates, readily available to the public at least annually through its website or, if it does not have one, through other means. Reports are published from 2015 to present on the agency website.

- 3. Before making aggregated sexual abuse data publicly available, the Washington County Sheriff’s Office will remove all personal identifiers. The auditor reviewed the published annual reports and observed personal identifiers were not included in the reports.

- 4. The Washington County Sheriff’s Office will 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.

Conclusion:

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding data storage, publication, and destruction. No corrective action is required.

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<p data-bbox="280 188 1007 224"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="280 264 579 300"><b>Auditor Discussion</b></p> <p data-bbox="280 340 1461 667">The Washington County Sheriff's Office operates the Washington County Justice Center, which is a county jail that serves Washington county residents and inmates from the Colorado Department of Corrections. On the first day of the audit, there were nineteen inmates who were residing in the facility. WCSO is participating in a PREA audit for the third time, and each of the previous two audits resulted in a finding of compliance with the prisons and jail standards. WCSO has not had a request or a requirement from the Department of Justice (DOJ) to complete an expedited audit.</p> <p data-bbox="280 707 1474 990">The auditor utilized the Auditor Compliance Tool for guidance on the conduct and contents of the audit. WCSO has demonstrated their continued efforts to comply with the standards and continues to take steps to improve their practices. The audit process involved reviewing all relevant policies, reports, handbooks, training curriculum and supporting documents; as well as conducting staff, contactor/ volunteer, and inmate interviews. The auditor reviewed documents and records involving information for 12 months prior to the onsite audit.</p> <p data-bbox="280 1030 1481 1272">The auditor is sufficiently satisfied that she was able to view every aspect of the facility during the site review. During the on-site audit as well as during the report writing phase of the audit, the auditor requested additional documentation to support the auditor's findings and received the documents in a timely manner. All audit material relied upon has been retained by the auditor and will be provided to the DOJ upon request.</p> <p data-bbox="280 1312 1469 1554">WCSO inmates were able to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel. The auditor did not receive correspondence from any staff member, resident or community member. The auditor has instructed the PREA Coordinator to ensure the audit notices are posted and remain posted until the facility receives their final report.</p> <p data-bbox="280 1662 448 1697">Conclusion:</p> <p data-bbox="280 1738 1461 1854">Based upon the review and analysis of the available evidence, the auditor has determined the facility is in compliance with this standard regarding frequency and scope of audits. No corrective action is required.</p>



<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Auditor report from 2019 for the Washington County Sheriff's Office can be found on the following website: <a href="http://washcountyjustice.com/prea/">http://washcountyjustice.com/prea/</a></p> <p>Conclusion: Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding audit contents and findings. No corrective action is required.</p>

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

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

115.13 (a)	Supervision and monitoring	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	no
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards?	yes
	In calculating adequate staffing levels and determining the need	yes

	for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
<b>115.13 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
<b>115.13 (d)</b>	<b>Supervision and monitoring</b>	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

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

<b>115.15 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
<b>115.15 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
<b>115.15 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes

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



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

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

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

<b>115.17 (c)</b>	<b>Hiring and promotion decisions</b>	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
<b>115.17 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
<b>115.17 (e)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
<b>115.17 (f)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
<b>115.17 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes

<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	na
<b>115.21 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

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

<b>115.21 (e)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
<b>115.21 (f)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
<b>115.21 (h)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	yes
<b>115.22 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
<b>115.22 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes

<b>115.22 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
<b>115.31 (a)</b>	<b>Employee training</b>	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes



<b>115.31 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
<b>115.31 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
<b>115.31 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.32 (a)</b>	<b>Volunteer and contractor training</b>	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
<b>115.32 (b)</b>	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
<b>115.32 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes

<b>115.33 (a) Inmate education</b>		
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
<b>115.33 (b) Inmate education</b>		
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
<b>115.33 (c) Inmate education</b>		
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes
<b>115.33 (d) Inmate education</b>		
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes

<b>115.33 (e)</b>	<b>Inmate education</b>	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
<b>115.33 (f)</b>	<b>Inmate education</b>	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes
<b>115.34 (a)</b>	<b>Specialized training: Investigations</b>	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.34 (b)</b>	<b>Specialized training: Investigations</b>	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

<b>115.34 (c)</b>	<b>Specialized training: Investigations</b>	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.35 (a)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.35 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na

<b>115.35 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.35 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
<b>115.41 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
<b>115.41 (b)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
<b>115.41 (c)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes

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

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



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

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

<b>115.43 (c)</b>	<b>Protective Custody</b>	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
<b>115.43 (d)</b>	<b>Protective Custody</b>	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
<b>115.43 (e)</b>	<b>Protective Custody</b>	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
<b>115.51 (a)</b>	<b>Inmate reporting</b>	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes

<b>115.51 (b)</b>	<b>Inmate reporting</b>	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes
<b>115.51 (c)</b>	<b>Inmate reporting</b>	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.51 (d)</b>	<b>Inmate reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
<b>115.52 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes

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

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

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

<b>115.53 (a)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	yes
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
<b>115.53 (b)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
<b>115.53 (c)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
<b>115.54 (a)</b>	<b>Third-party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes



<b>115.61 (a)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
<b>115.61 (b)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
<b>115.61 (c)</b>	<b>Staff and agency reporting duties</b>	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
<b>115.61 (d)</b>	<b>Staff and agency reporting duties</b>	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes

<b>115.62 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
<b>115.63 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.63 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.63 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes

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

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

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

<b>115.67 (d)</b>	<b>Agency protection against retaliation</b>	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
<b>115.67 (e)</b>	<b>Agency protection against retaliation</b>	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
<b>115.68 (a)</b>	<b>Post-allegation protective custody</b>	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
<b>115.71 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
<b>115.71 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
<b>115.71 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes

<b>115.71 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
<b>115.71 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
<b>115.71 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
<b>115.71 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
<b>115.71 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
<b>115.71 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes

<b>115.71 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
<b>115.71 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes



<b>115.73 (c)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (d)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (e)</b>	<b>Reporting to inmates</b>	
	Does the agency document all such notifications or attempted notifications?	yes

<b>115.76 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.76 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
<b>115.76 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
<b>115.76 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
<b>115.77 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
<b>115.77 (b)</b>	<b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes

<b>115.78 (a)</b>	<b>Disciplinary sanctions for inmates</b>	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
<b>115.78 (b)</b>	<b>Disciplinary sanctions for inmates</b>	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
<b>115.78 (c)</b>	<b>Disciplinary sanctions for inmates</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
<b>115.78 (d)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
<b>115.78 (e)</b>	<b>Disciplinary sanctions for inmates</b>	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
<b>115.78 (f)</b>	<b>Disciplinary sanctions for inmates</b>	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes

<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
<b>115.81 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
<b>115.81 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
<b>115.81 (e)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes

<b>115.82 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
<b>115.82 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
<b>115.82 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
<b>115.82 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
<b>115.83 (b)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes

<b>115.83 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
<b>115.83 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
<b>115.83 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
<b>115.83 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.83 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes

<b>115.83 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes
<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
<b>115.86 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.86 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes

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



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

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

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

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