

PREA Facility Audit Report: Final

Name of Facility: Pike County Community Work Center

Facility Type: Community Confinement

Date Interim Report Submitted: NA

Date Final Report Submitted: 07/18/2025

Auditor Certification

The contents of this report are accurate to the best of my knowledge.



No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.



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.



Auditor Full Name as Signed: Joy Catrett-Bell

Date of Signature: 07/18/2025

AUDITOR INFORMATION

Auditor name: Catrett-Bell, Joy

Email: jcbell1111@gmail.com

Start Date of On-Site Audit: 07/15/2025

End Date of On-Site Audit: 07/16/2025

FACILITY INFORMATION

Facility name: Pike County Community Work Center

Facility physical address: 2015 Jesse Hall Road, Magnolia, Mississippi - 39652

Facility mailing address:

Primary Contact

Name:	Shanell Reed
Email Address:	SReed@mdoc.state.ms.us
Telephone Number:	(601) 442-0129

Facility Director	
Name:	Teriah Nichols
Email Address:	TNichols@mdoc.state.ms.us
Telephone Number:	(601) 783-5514

Facility PREA Compliance Manager	
Name:	
Email Address:	
Telephone Number:	

Facility Health Service Administrator On-Site	
Name:	Chelsea Aldridge
Email Address:	CAldridge@VitalCoreHS.com
Telephone Number:	(601) 932-2880

Facility Characteristics	
Designed facility capacity:	93
Current population of facility:	82
Average daily population for the past 12 months:	46
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Men/boys

In the past 12 months, which population(s) has the facility held? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For definitions of “intersex” and “transgender,” please see https://www.prearesourcecenter.org/standard/115-5)	
Age range of population:	20-65
Facility security levels/resident custody levels:	Minimum Custody
Number of staff currently employed at the facility who may have contact with residents:	13
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	0
Number of volunteers who have contact with residents, currently authorized to enter the facility:	0

AGENCY INFORMATION	
Name of agency:	Mississippi Department of Corrections
Governing authority or parent agency (if applicable):	
Physical Address:	301 North Lamar Street, Jackson, Mississippi - 39201
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:	
Name:	

Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information			
Name:	Lisa Neal	Email Address:	LNeal@mdoc.state.ms.us

Facility AUDIT FINDINGS	
Summary of Audit Findings	
<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>	
Number of standards exceeded:	
3	<ul style="list-style-type: none"> • 115.211 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator • 115.213 - Supervision and monitoring • 115.216 - Residents with disabilities and residents who are limited English proficient
Number of standards met:	
38	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2025-07-15
2. End date of the onsite portion of the audit:	2025-07-16

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:	MCSA-Mississippi Coalition against Sexual Assault

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	93
15. Average daily population for the past 12 months:	46
16. Number of inmate/resident/detainee housing units:	1
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

18. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	77
19. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
20. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	0
21. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
22. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
23. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0
24. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	0

25. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
26. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	0
27. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	0
28. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
29. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	The population of inmates meeting the criteria in certain categories was not present.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
30. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	12
31. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0

32. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0
33. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
34. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	16
35. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input type="checkbox"/> Housing assignment <input type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None
36. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	The Auditor reviewed the roster and selected inmates based upon the above factors.
37. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No

38. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	<p>The Auditor began conducting inmate interviews the first day of the on-site portion of the audit. Based upon the inmate population on day one of the audit, the PREA Auditor Handbook required that the auditor interview a minimum of 16 inmates, (8 random and 8 targeted.) A total of 16 inmate interviews were conducted. All interviews with inmates occurred in a secure area to ensure privacy. Inmate interviews were conducted using the established DOJ interview protocols. If a randomly selected inmate had refused to be interviewed, an additional inmate from the same housing area would be selected to get a cross-section review of the entire general population. There were no instances of refusal of selected inmates for interviews.</p>
Targeted Inmate/Resident/Detainee Interviews	
39. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	0
<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>	
40. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0

<p>40. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</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>40. 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).</p>	<p>Based on information received in the PAQ, site documentation review, and interviews with staff and inmates. There were no inmates who disclosed this information during the facility screening process.</p>
<p>41. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>41. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</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>41. 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).</p>	<p>Based on information received in the PAQ, site documentation review, and interviews with staff and inmates. There were no inmates who disclosed this information during the facility screening process.</p>

42. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	0
42. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<div data-bbox="815 416 1469 577"> <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. </div> <div data-bbox="815 622 1469 703"> <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed. </div>
42. 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).	Based on information received in the PAQ, site documentation review, and interviews with staff and inmates. There were no inmates who disclosed this information during the facility screening process.
43. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	0
43. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<div data-bbox="815 1384 1469 1545"> <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. </div> <div data-bbox="815 1590 1469 1671"> <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed. </div>
43. 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).	Based on information received in the PAQ, site documentation review, and interviews with staff and inmates. There were no inmates who disclosed this information during the facility screening process.

44. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	0
44. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<div> <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. </div> <div> <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed. </div>
44. 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).	Based on information received in the PAQ, site documentation review, and interviews with staff and inmates. There were no inmates who disclosed this information during the facility screening process.
45. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	0
45. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<div> <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. </div> <div> <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed. </div>
45. 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).	Based on information received in the PAQ, site documentation review, and interviews with staff and inmates. There were no inmates who disclosed this information during the facility screening process.

46. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	0
46. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<div> <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. </div> <div> <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed. </div>
46. 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).	Based on information received in the PAQ, site documentation review, and interviews with staff and inmates. There were no inmates who disclosed this information during the facility screening process.
47. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	0
47. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<div> <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. </div> <div> <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed. </div>
47. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	Based on information received in the PAQ, site documentation review, and interviews with staff and inmates. There were no inmates who disclosed this information during the facility screening process.

<p>48. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>0</p>
<p>48. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</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>48. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Based on information received in the PAQ, site documentation review, and interviews with staff and inmates. There were no inmates who disclosed this information during the facility screening process.</p>
<p>49. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>49. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</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>

49. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	Based on information received in the PAQ, site documentation review, and interviews with staff and inmates. There were no inmates who disclosed this information during the facility screening process.
50. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	The population of inmates meeting the criteria in certain categories was not present.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
51. Enter the total number of RANDOM STAFF who were interviewed:	5
52. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	<div> <input type="checkbox"/> Length of tenure in the facility <input checked="" type="checkbox"/> Shift assignment <input checked="" type="checkbox"/> Work assignment <input checked="" type="checkbox"/> Rank (or equivalent) <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None </div>
53. Were you able to conduct the minimum number of RANDOM STAFF interviews?	<div> <input type="radio"/> Yes <input checked="" type="radio"/> No </div>

53. Select the reason(s) why you were unable to conduct the minimum number of RANDOM STAFF interviews: (select all that apply)	<input type="checkbox"/> Too many staff declined to participate in interviews. <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). <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. <input type="checkbox"/> Other
54. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Specialized Staff, Volunteers, and Contractor Interviews	
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.	
55. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	12
56. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
57. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No

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

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

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

	<input type="checkbox"/> Other
61. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
62. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
63. Provide any additional comments regarding selecting or interviewing specialized staff.	Random staff were selected and there were no barriers in completing interviews.
SITE REVIEW AND DOCUMENTATION SAMPLING	
Site Review	
<p>PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.</p>	
64. Did you have access to all areas of the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
Was the site review an active, inquiring process that included the following:	
65. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	<input checked="" type="radio"/> Yes <input type="radio"/> No

66. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
67. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
68. Informal conversations with staff during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
69. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	<p>The Auditor had full, unimpeded access to all areas of the facility. During the review of the physical plant, the Auditor observed the facility layout, staff supervision of inmates, security rounds, interaction between staff and inmates, shower and toilet areas for inmates, observation of availability of PREA information located adjacent to and in the inmate housing areas, observation of staff communication in inmate housing units, search procedures, and availability access of medical and mental health services. The Auditor observed and made notes of the video monitoring system and camera placement throughout the facility, including reviewing control room monitors.</p>
Documentation Sampling	
<p>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>	
70. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	<input checked="" type="radio"/> Yes <input type="radio"/> No

71. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).

The Auditor conducted a document review of employee and inmate files and reviewed documents that were provided to the auditor with the PAQ, including logbooks and other institutional forms. The Auditor reviewed a random sampling of personnel files to determine compliance of standards on hiring, promotion and background check procedures for officers. The Auditor reviewed the annual PREA training rosters maintained by the training staff and cross referenced the staff files with the training rosters to ensure training was verified. The staff explained the process for relaying the mandated PREA information to new employees, as well as the procedure for annual refresher training. Reviewed inmate files to evaluate intake procedures, including screening, housing assignments, and verification of inmate PREA education. The Auditor requested additional supporting documentation that included training records, inmate classification records, and staff PREA disclosure forms for hiring and promotions.

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	0	0	0

Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	0	0	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

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

0

78. Explain why you were unable to review any sexual abuse investigation files:

The facility reported there had been no offenses committed to file.

79. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<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)
Inmate-on-inmate sexual abuse investigation files	
80. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
81. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<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)
82. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<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)
Staff-on-inmate sexual abuse investigation files	
83. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
84. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

85. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
86. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	0
86. Explain why you were unable to review any sexual harassment investigation files:	The facility reported there had been no offenses committed to file.
87. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
88. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
89. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	<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 harassment investigation files)

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

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

95. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.

☐ Yes

☒ No

Non-certified Support Staff

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

☒ Yes

☐ No

96. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:

1

AUDITING ARRANGEMENTS AND COMPENSATION

97. Who paid you to conduct this audit?

☐ The audited facility or its parent agency

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

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

☐ Other

Identify the name of the third-party auditing entity

abm prea auditors llc

Standards
Auditor Overall Determination Definitions
<ul style="list-style-type: none"> 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
<p>Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.</p>

115.211	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>115.211 Zero Tolerance of Sexual Abuse and Sexual Harassment</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>PD 20-14 Sexual Abuse and Sexual Harassment of Inmates(PREA)</p> <p>MDOC Organizational Chart</p> <p>Position Descriptions</p> <p>Interviews</p> <p>Operating Procedure policy 20-14 outlines the facility's approach to implementing practices covered by the agency policy and the Agency PREA policy. MDOC has a comprehensive PREA policy which clearly mandates a Zero-tolerance policy on all forms of sexual abuse and harassment and provides definitions of prohibited behaviors. In accordance with Standard 115.211, there are sanctions for those who</p>

	<p>have been found to have participated in prohibited behaviors. The Agency's PREA Coordinator oversees and coordinates the efforts of MDOC to comply with Federal PREA Standards including development and implementation of policy, staff training and inmate education. The PREA Manager coordinates the collection of data, and the preparation for each three-year cycle of audits required by the standards.</p> <p>In response to the standards, each MDOC facility has assigned a PREA manager with sufficient time and authority to coordinate the facility's efforts to comply with requirements of PREA policy. The PREA coordinator ensures the Agency works to achieve compliance in all areas of the standards. The PM is responsible for monitoring and aiding in areas such as staff training, education, reporting, documentation, and investigation of PREA-related allegations. The PM may serve as members of the Incident Review team and serve as a point of contact for people outside the agency on issues related to PREA standards.</p> <p>Conclusion: Based on the Auditor's review of related policy, memorandums, facility organization charts, and staff interviews, the Auditor determined that the facility exceeds the mandate for this standard.</p>
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115.212	Contracting with other entities for the confinement of residents
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>115.212 Contracting with Other Entities for the Confinement of Inmates</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>MDOC Policy 20-14 Prison Rape Elimination Act (PREA)</p> <p>Interviews</p> <p>MDOC PREA policy states that the agency will include in any new contract or contract extension, pertaining to the confinement of inmates, the obligation for the contractor to adopt and comply with all PREA standards and policy. The Agency will provide contract monitoring for any new contract or contract extension listed to ensure the contractor complies with the PREA Standards. The contracted vendor must comply with the Federal Prison Rape Elimination Act (PREA), 28 CFR Part 115 and must immediately refer any allegations of sexual abuse or sexual harassment to the State's on-site coordinator. The vendor will ensure compliance with the National Standards to prevent, detect and respond to PREA, effective August 20, 2012, as noted in the PREA standards.</p> <p>The Contract Manager, or designee will serve as the lead for all contract-related issues and will assist in facilitating meetings, determining service level agreements,</p>

	<p>overseeing transitional obligations, to ensure the contractual requirements are met.</p> <p>MDOC has not secured or renewed a contract for the confinement of inmates on or after August 20, 2012, or since the last PREA audit. Such contracts do require contractors to adopt and comply with PREA standards. Additionally, the contracts do require MDOC to monitor the contractor's compliance with the PREA standards.</p> <p>Conclusion: Based on staff interviews and document review, the Auditor determined the facility meets the standard.</p>
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115.213	Supervision and monitoring
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>115.213 Supervision and Monitoring</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>MDOC Policy 20-14 Prison Rape Elimination Act (PREA)</p> <p>Staffing Plan</p> <p>Interviews</p> <p>MDOC Policy 03-29 Review of Staffing</p> <p>Unannounced PREA Rounds</p> <p>Shift Roster</p> <p>Inmate Roster</p> <p>MDOC Policy 06-02 Daily Population Report</p> <p>Policy 25-08-C Staffing Plan</p> <p>SOP 20-14-01 Supervision and Monitoring</p> <p>In accordance with the provisions of the staffing plan, the PREA Manager and PREA Coordinator review the staffing plan and implement adjustments required. During circumstances when the staffing plan is deviated from, the facility will document and justify the deviations. The shift Major or designee reviews the daily staffing rosters to ensure that staffing levels are met and can authorize approval to vacate a non-critical post. The facility accurately documents justifications for deviations from the staffing plan and the most common reasons for deviations from the staffing plan</p>

	<p>are short term disability, medical emergency leave, inmate medical transportation, In-service training, vacations, and retirements.</p> <p>The Pike CWC staffing plan appears satisfactory in the agency's efforts to provide protection against sexual abuse and harassment. Adequate staffing was considered to ensure safety for the facility's current and population that require more intensive or specialized staffing for LGBTIQ inmates, inmates with medical or mental health needs, disabled, and LEP inmates. The Auditor observed cameras in the facility and observed interactions between staff and inmates.</p> <p>The Auditor observed staff conducting daily rounds to ensure visibility, increased safety of staff and inmates, and afford the inmate population an opportunity for informal access to administrators. While conducting rounds, staff will conduct a complete and thorough assessment to identify unusual activity and safety, security, policy, or violations. Staff take necessary, timely, and appropriate action to address any unusual activity or violations. The Auditor reviewed housing unit logbooks and observed opposite gender announcements.</p> <p>Conclusion: Based on the review of the staffing plan, quarterly post assignment, daily post assignment rosters, interviews, unannounced rounds, the Auditor determined the facility exceeds the mandate for the standard.</p>
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115.215	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.215 Limits to Cross-gender Viewing and Searches</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>MDOC Policy 20-14 Prison Rape Elimination Act (PREA)</p> <p>Policy Directive PREA and Prohibited Sexual Conduct involving Inmates</p> <p>115.215-MDOC SOP 20-14-01 PREA Limits to Cross Gender viewing</p> <p>Training Rosters</p> <p>Interviews</p> <p>PAQ</p> <p>The MDOC policy states that a strip search will be performed only by employees of the same sex as the inmate being searched. A strip search also will be performed only in the presence of employees of the same sex as the inmate being searched</p>

except that it may be conducted in the presence of a supervisory employee of the opposite sex when a supervisor's presence is required by policy and a supervisor of the same sex as the inmate being searched is not available.

Policy states that a licensed physician, physician's assistant, or nurse practitioner must conduct a body cavity search. Medical personnel who perform a body cavity search need not be of the same sex as the inmate being searched. However, all other persons who are present during the search will be of the same sex as the inmate and there always will be at least one staff member present who is the same sex as the inmate being searched.

Staff interviews did not indicate any cross-gender strip or cross-gender visual body cavity searches of inmates, including any exigent circumstances, conducted by security or medical staff, conducted at the facility. The PAQ listed zero cross-gender strip or cross-gender visual body cavity searches of inmates in the past 12 months and interviews with inmates concluded they have not had any occurrences in where they were subjected to cross-gender viewing by staff during a strip search or visual search. Staff interviews indicated they received search training during annual training.

A written report of the search will be documented as soon as possible but not later than the end of the shift after which the search occurred. If an inmate's gender status is unknown, it may be determined by conversation with the inmate, a review of available medical records, or as part of a broader medical examination conducted in private by a licensed medical professional. If there is uncertainty as to a person's gender, the OIC will use best judgment practices to determine how the person presents, as male or female, and will arrange for an officer of the gender to conduct the search. If the inmate objects based on gender, an officer of the person's preferred gender will conduct the search. All staff interviewed reported the facility prohibits staff from searching or physically examining transgender or intersex inmates for the sole purpose of determining genital status.

The facility confirmed that security staff will be trained on how to conduct cross-gender pat-searches, and searches of transgender and intersex inmates. The searches will be conducted in a professional and respectful manner, which is least intrusive. These searches will be consistent with security needs. Routine strip searches or visual body cavity searches will occur in authorized areas and searches based on reasonable suspicion require the supervisor's authorization.

Female correctional officers may pat-search inmates of both genders and policy notes that searches may be conducted by female staff on male inmates. Strip searches are performed exclusively by staff of the same gender and includes a provision for transgender or intersex inmates who may prefer to be searched by a specific gender of staff. The PAQ noted that all facility staff have received training and confirmation of Pre-service search training was provided. The auditor was provided training rosters identifying security staff's completion of the required training and training provided was taken from the "Search Training" lesson plan. Signage is posted that the opposite gender staff must announce themselves when

	<p>entering the housing unit and this practice was observed during the tour.</p> <p>The facility has implemented procedures that allow inmates to shower, change clothes, and use the toilet without being viewed by staff of the opposite gender. The Auditor conducted a tour of the facility and was granted access to all inmate housing units and other support areas. The Auditor observed shower and restroom areas in the facility and confirmed the inmates could shower and use the restroom without security staff of the opposite gender seeing them without clothing.</p> <p>Conclusion:</p> <p>Based on the review of policies, documents, confirmation of training, and interviews, the Auditor determined the facility has demonstrated compliance and meets the provisions of this standard.</p>
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115.216	Residents with disabilities and residents who are limited English proficient
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>115.216 Inmates with Disabilities and Inmates who are Limited English Proficient</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>MDOC Policy 20-14 Prison Rape Elimination Act (PREA)</p> <p>Bi-Lingual Informed Consent Poster and Privacy Notice Sign</p> <p>Interviews</p> <p>GLOBE Translation Services</p> <p>Inmate Handbook</p> <p>MDOC SOP 20-14-01 PREA Limits to Cross Gender viewing</p> <p>MDOC policy takes appropriate steps to ensure that inmates with disabilities, including those who are deaf, blind or have intellectual limitations, have an equal opportunity to participate and benefit from all aspects of the facility's efforts to prevent, detect, and respond to sexual abuse and harassment. MDOC policy is written in accordance with Standard 115.216 and states that the PM is responsible for development and distribution of educational materials related to the education of inmates regarding the agency's zero tolerance for sexual abuse and sexual harassment of inmates. Educational materials include information on treatment, advocacy, and counseling services.</p> <p>MDOC policy states the facility will provide PREA education in formats</p>

	<p>understandable by the entire inmate population and facility will seek the assistance of inmate interpreters or inmate reader assistants only in limited circumstances where an extended delay in obtaining a contract interpreter could compromise the inmate's safety, the performance of first-response duties or a investigation.</p> <p>The agency provides a PREA specific brochure in Spanish, as well as publishing their inmate handbooks in Spanish and a language interpreting service is available. Each inmate entering the facility is provided a written copy of the Zero Tolerance for Sexual Abuse and Sexual Harassment and provided PREA education within 30 days of arriving at the facility. Inmates are required to sign the training acknowledgement form for verification of receipt of the inmate handbook and PREA education.</p> <p>Conclusion:</p> <p>The Auditor reviewed policies, procedures, inmate handbook, Zero Tolerance for Sexual Abuse and Sexual Harassment handout, PREA educational material, interpretive services contracts, inmate records, and training records. The Auditor determined the facility exceeds the requirements of this standard.</p>
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115.217	Hiring and promotion decisions
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>115.217 Hiring and Promotion decisions</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive 150.01.01.003, Employment Screening</p> <p>Operating Procedure-20-14 Prohibited Sexual Conduct Involving Inmates</p> <p>MDOC SOP 20-14-01 PREA (Hiring and Promotional decisions)</p> <p>Employee Handbook</p> <p>Background Investigation Questionnaire</p> <p>Employee Self-Assessment Form</p> <p>Interviews</p> <p>PAQ</p> <p>Policy states that the facility will not knowingly hire any new employee, promote any existing employee, or enlist the services of any contractor who has contact with</p>

	<p>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); been convicted of engaging in, attempting to engage in or conspiracy to engage in sexual activity 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; or been civilly or administratively adjudicated to have engaged in the activity described above. Policy requires that once every five years criminal history checks are processed for all MDOC employees and a repeat check can be conducted at any time within the five-year period, if determined necessary.</p> <p>Any information produced from the criminal history check that has not been previously reported or investigated will be referred by the reviewing staff for investigation. Criminal history checks will be completed for all staff who work at the facility. Contractors and volunteers who have contact with inmates at the facilities will have an annual criminal history check processed.</p> <p>The MDOC requires that all applicants apply for positions and complete the employment application packet which include the required PREA questions. If any of the PREA questions are confirmed as “yes” by the applicant, the applicant is ineligible for employment until the packet can be reviewed. Any staff applying for a promotion is required to answer the PREA questions regarding cases in which they were implicated. The Auditor concluded the facility is performing appropriate practices to identify previous acts of sexual misconduct prior to hiring staff and enlisting the services of contractors or promoting staff.</p> <p>Conclusion:</p> <p>The Auditor conducted a review of policies, procedures, employee records, Background Investigations, interviewed staff, and determined the facility meets the requirements of this standard.</p>
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115.218	Upgrades to facilities and technology
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.218 Upgrades to Facilities and Technologies</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>MDOC 20-14-01 PREA (Upgrades to facilities and technology)</p> <p>Camera Diagram</p> <p>Interviews</p>

	<p>Observations</p> <p>MDOC policy states that when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the effect of the design, acquisition, expansion, or modification and the facility's ability to protect inmates from sexual abuse, will be considered. When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the ability to protect inmates from sexual abuse will be reviewed.</p> <p>The Major and PM stated that when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the facility considers how such technology may enhance their ability to protect inmates from sexual abuse. Facility staff monitor the cameras to ensure they are operational and to identify any areas that may need additional coverage. There have not been any upgrades during this audit cycle.</p> <p>Conclusion:</p> <p>The Auditor determined that the facility meets the provisions of this standard.</p>
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115.221	Evidence protocol and forensic medical examinations
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>115.221 Evidence Protocol and Forensic Medical Examinations</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive 20-14 Sexual Abuse Sexual Harassment of Inmates-PREA</p> <p>Policy Directive 504.02.01.001, Investigations, and Intelligence Program</p> <p>PD 116.02.01.001, Custody of Evidence</p> <p>Investigator Training</p> <p>Interviews</p> <p>SOP 20-14-01 Evidence Protocol and Forensic Medical Examinations</p> <p>MDOC Policy 12-05 Criteria for Correction Investigation Division (CID) Investigation</p> <p>MOU: Mississippi Coalition against Sexual Assault</p> <p>MDOC policy states that investigations of sexual abuse/sexual harassment will only be completed by employees who have received specialized investigator training as</p>

	<p>outlined by policy. All investigations will be conducted promptly, thoroughly, and objectively in accordance with the Sexual Abuse/Sexual Harassment Investigations. Facility trained investigators conduct administrative investigations and allegations of sexual abuse and sexual harassment that appear criminal in nature are referred to CID.</p> <p>Facility staff are required to preserve any crime scene until a CID investigator arrives to collect or process physical evidence from the scene. The facility investigation will be coordinated as necessary with the investigating law enforcement agency to ensure the facility efforts will not be an obstacle for prosecution and to remain informed of the status of the investigation. Facility investigations will proceed in accordance with policy regardless of whether the referral results in criminal prosecution.</p> <p>Conclusion:</p> <p>The Auditor determined that the facility meets the requirements of this standard.</p>
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115.222	Policies to ensure referrals of allegations for investigations
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>115.222 Policies to Ensure Referrals of Allegations for Investigations</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive 20-14 Sexual Abuse Sexual Harassment of Inmates-PREA</p> <p>SOP 20-14-01 Policies to Ensure Referrals of Allegations for Investigation</p> <p>Interviews</p> <p>The MDOC Operating Procedure is written in accordance with Standard 115.222 and requires that an investigation be completed into all allegations of sexual abuse and harassment. The PM will ensure that information on all allegations of inmate-on-inmate sexual abuse/sexual harassment, employee sexual abuse/sexual harassment, or employee overfamiliarity, are secured at their respective facilities and investigated.</p> <p>Each sexual abuse or sexual harassment case has a PREA Sexual Abuse Investigation or Sexual Harassment investigation completed. Cases reported verbally, in writing, anonymously, or from third parties, will be entered into the agency's investigation database. Supervisory staff will refer the allegation as soon</p>

	<p>as possible, but no later than one business day after the report was made.</p> <p>The facility PM, supervisors, and investigators work very together to ensure that all allegations of sexual abuse and harassment are investigated promptly and thoroughly and if an inmate alleges a sexual assault or sexual harassment has taken place, the staff member will notify the supervisor, who will make the initial report. The supervisor will complete the PREA First Responder checklist. The investigator coordinates as needed with the PM to determine the course of action and the PC is notified. These policies' address referrals for inmate-on-inmate non-consensual sexual acts and staff sexual misconduct/harassment that would constitute a criminal act. Agency policies are published on the agency's website: https://www.MDOC.ms.gov/content/prisons/prea.</p> <p>Conclusion:</p> <p>The Auditor conducted interviews, observed daily assignments, and determined the facility is compliant with provisions of this standard.</p>
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115.231	Employee training
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>115.231 Employee Training</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Training Records</p> <p>Policy Directive 20-14 Sexual Abuse Sexual Harassment of Inmates-PREA</p> <p>Staff Interviews</p> <p>MDOC Training Modules</p> <p>SOP 20-14-01 Employee Training</p> <p>Policy requires that all facility employees, student assistants, unpaid student interns, volunteers, and contractors, are required to successfully complete in service training in accordance with the requirements set forth in MDOC Policy directives. MDOC employees are required to complete PREA training at a minimum of once yearly. The training is completed annually to aid in fulfillment of annual training requirements and to ensure each employee remains current on MDOC policies and procedures regarding sexual abuse and harassment. The Auditor was provided with PREA curriculum, training logs, certificates of completion, and training acknowledgement forms.</p>

	<p>Conclusion:</p> <p>The Auditor determined the facility meets the requirements of this standard.</p>
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115.232	Volunteer and contractor training
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>115.232 Volunteer and Contractor Training</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive 20-14 Version 6, Sexual Abuse Sexual Harassment of Inmates-PREA</p> <p>Policy 20-14-.01 Volunteer Services Program</p> <p>PREA Training acknowledgment forms</p> <p>PAQ</p> <p>MDOC provides standardized training and orientation for all new employees, contractors, vendors, and volunteers who provide services and have contact with inmates at facilities. Contractors who have direct continuous supervision or escorted by facility staff, are required to review the PREA module and provide a signature as an understanding of requirements. New contractors and volunteers are given PREA training during their orientation prior to assuming their duties and are required to sign for verification as acknowledgment they have received the information. All volunteers and contractors, who may have contact with inmates, will be trained on the facility's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response. MDOC's training curriculum for contractors and volunteers sufficiently addresses the concepts of sexual abuse, sexual harassment, reporting and response procedures.</p> <p>Conclusion:</p> <p>The Auditor determined the facility effectively trains volunteers, contractors, staff, and ensure documentation of training is maintained. The Auditor determined the facility meets the requirements of this standard.</p>

115.233	Resident education
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	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.233 Inmate Education</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive 20-14 Sexual Abuse Sexual Harassment of Inmates-PREA</p> <p>Inmate Orientation Packet</p> <p>Inmate PREA Education Form/ and 72-hour form</p> <p>Global Link (English and Spanish)</p> <p>Sexual Abuse Poster (English and Spanish)</p> <p>Inmate Handbook</p> <p>MDOC SOP 20-14-01 PREA (Inmate Education)</p> <p>Interviews</p> <p>Training Records</p> <p>PAQ</p> <p>The MDOC policy is written in accordance with Standard 115.233 which states all inmates will receive comprehensive PREA education during intake and upon transfer to another facility within 30 days of arrival. Upon 72 hours of arrival at a facility, the inmate will receive educational material on Zero Tolerance, how to report, name of the facility PREA Manager, contact information for outside entity reporting, Victim advocate services, and Emotional support services. In accordance with the policy, inmates will receive orientation upon arrival at an MDOC facility, and the PREA Manager will develop and maintain an orientation program for newly arrived inmates.</p> <p>During intake processing, inmates receive comprehensive information explaining the Agency's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Topics covered during inmate education include inmates' rights to be free from sexual abuse and sexual harassment and/or retaliation for reporting such incidents, available methods to report incidents, and agency policies and procedures for responding to such incidents. Staff also issue a brochure that covers the Zero-tolerance policy, definitions of sexual abuse- sexual harassment-retaliation, how to report sexual abuse, process required following a report, available services to victims, and sexual abuse avoidance.</p> <p>During intake processing, each intake counselor is required to complete a file review to ensure verification is documented for PREA education. The Auditor reviewed</p>

	<p>inmate files and reviewed inmate transfer rosters that verified education was provided in a timely manner. As part of the facility's intake and receptions procedures, each new classification file is reviewed and verified that the inmate has documented receipt of training.</p> <p>The facility utilizes a phone system that contracts with Globe Inc. for interpretative services for disabled or LEP inmates. PREA Signage was visible throughout the housing units, shared areas, and work locations. Inmates receive a PREA brochure that is published in both English and Spanish during their intake process and these materials were observed to be available to inmates in various other areas. The Auditor observed the efforts of the facility to actively advertise and promote PREA resources throughout the facility and inmates can access PREA information through their tablets.</p> <p>Conclusion:</p> <p>The Auditor determined compliance, and the facility meets the requirements of this standard.</p>
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115.234	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.234 Specialized Training: Investigations</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive 20-14, Sexual Abuse Sexual Harassment of Inmates-PREA</p> <p>SOP 20-14-01- Investigations training</p> <p>Basic Investigator Training Manual</p> <p>NIC PREA Online Training Program Completion Certificates</p> <p>Basic Investigator Training and Completion Report</p> <p>Interviews</p> <p>PAQ</p> <p>Agency policy is written in accordance with Standard 115.234. Investigations of sexual abuse/sexual harassment will only be completed by employees who have received specialized investigator training as outlined in the PREA policy. All investigations will be conducted promptly, thoroughly, and objectively in accordance with the Sexual Abuse/Sexual Harassment Investigations and facility investigators are required to receive specialized training to conduct sexual abuse investigations in</p>

	<p>confinement settings.</p> <p>The facility has trained investigators who have completed the required PREA training and continue to further their knowledge in critical institutional investigating practices. Specialized training includes, "Investigations in Confinement Settings", techniques for interviewing sexual abuse victims, Miranda and Garrity warnings, sexual abuse evidence collection, and prosecution evidence referral. A review of training materials and training records for investigators demonstrates compliance with the provision of the standard</p> <p>Conclusion:</p> <p>The Auditor conducted a review of policies, directives, training curriculum, training records, and conducted interviews with investigators to determine the facility meets the requirements of this standard.</p>
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115.235	Specialized training: Medical and mental health care
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>115.235 Specialized Training: Medical and Mental Health Care</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <p>Policy Directive In-service Training</p> <p>Interviews</p> <p>Staff Training Rosters</p> <p>PAQ</p> <p>MDOC Operating Procedure requires that all staff members receive PREA training in accordance with standard 115.231. The policy requires that all part- and full-time mental health and medical staff members receive additional specialized training. Student assistants, unpaid student interns, agency employees, and contractual employees are required to successfully complete in-service training in accordance with the policy requirements and the In-Service Training Plan.</p> <p>The MDOC also provides training to their medical and mental health staff to serve as a qualified agency staff member. Medical and mental health practitioners with the MDOC receive training beyond the standard's minimal requirements. Contractors who enter the facility to conduct forensic exams must be appropriately trained to conduct such exams and be provided with required agency policy prior to providing services within the agency. The policy establishes procedures for ensuring staff,</p>

	<p>including contract staff, are adequately trained based on their positions within the agency.</p> <p>Conclusion:</p> <p>Based on review of policies, procedures, inmate records, and interviews, the Auditor determined the facility meets the requirements of this standard.</p>
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115.241	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.241 Screening for Risk of Victimization and Abusiveness</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive 20-14 Sexual Abuse and Sexual Harassment of Inmates</p> <p>Inmate Placement and Transfer Policy</p> <p>PREA Risk Assessments</p> <p>MDOC SOP 20-14-01 PREA (Risk of Sexual Victimization and Abusiveness)</p> <p>Mental Health Intake Screening Form</p> <p>Psychological Evaluation Screening</p> <p>LEGATO Program</p> <p>Interviews</p> <p>Risk Screening</p> <p>30 Day Review</p> <p>Medical Referrals</p> <p>PAQ</p> <p>MDOC policy states that a transferred inmate will be screened within 72 hours of arrival at the receiving facility to identify any history of sexually aggressive behavior and to assess the inmate's risk for sexual victimization. Staff will complete PREA risk assessments in accordance with Standard 115.241. The policy states that all inmates will be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or being sexually</p>

	<p>abusive toward other inmates. The assessment will be completed using information contained in the inmates' file and from computerized databases available to employees. The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse.</p> <p>Screening policy requires all inmates to be screened for risk of sexual victimization or risk of sexual abuse of other inmates within 72 hours of their intake and interviews with inmates confirmed that they were screened within the timeframe. Review of inmates' files supports initial screening, psychological screening, and reassessment within 30 days from date of arrival. An inmate's risk level is reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information of an inmate's risk of sexual victimization or abusiveness. The PM stated that a reassessment is completed any time there is an incident and based on referrals from a staff member.</p> <p>During the initial assessment screening, staff perception of the inmate is documented, and the inmates are asked about their sexual orientation. Staff meet with inmates to conduct the reassessment, and inmates are not disciplined for refusing to answer, or not disclosing information in response to questions. Any refusal by the inmates is documented in accordance with policies.</p> <p>An inmate's risk level is reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information of an inmate's risk of sexual victimization or abusiveness. The PM stated that a reassessment is completed any time there is an incident based on a referral from a staff member, medical request, or incident of sexual assault. The LEGATO program is used as a tool to monitor and track HRSA and HRSV inmates.</p> <p>Conclusion:</p> <p>The Auditor reviewed policies, procedures, inmate records, and determined the facility meets the requirements of this standard.</p>
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115.242	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.242 Use of Screening Information</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive Inmate Placement and Transfer</p>

	<p>SOP 20-14 Sexual Abuse and Sexual Harassment of Inmates (PREA)</p> <p>Interviews</p> <p>MDOC SOP 20-14-01 PREA (Use of Screening Information) Intake Medical History and Screening/Intake Mental Health Screen</p> <p>Housing Rosters</p> <p>PAQ</p> <p>The Auditor reviewed inmate classification records confirming staff make individualized considerations when determining inmate housing, bed, work, and other assignments to ensure each inmate is housed safely in the facility. The Auditor observed classification staff utilize information obtained from risk screening and the LEGATO program to assign facility housing, bed, and work assignments to ensure vulnerable inmates(HRSV) are protected. Classification staff will document screening information to identify inmates at risk of victimization(HRSV) to ensure they are not placed in a work or education assignment with those identified as potential abusers(HRSA). The Auditor verified that staff conduct the risk screening on all inmates during the intake process and consider the inmate's own perceptions of their safety before making classification decisions and the screening tool includes sections for the staff to document their own perceptions of the inmate.</p> <p>Staff are aware of their responsibilities should they receive a transgender inmate regarding this standard. Interviews with facility staff indicate that placement of any transgender or intersex inmate is made on a case-by-case determination. Agency policy stipulates that placement and programming assignments for transgender inmates will be reassessed at least twice a year to review any threats to the inmate's safety. A transgender inmate's views with respect to his or her safety will be given serious consideration during placement.</p> <p>A review indicated that any identified LGBTIQ inmates would be placed in different units, buildings, wings, and bed areas throughout the facility and the facility was not under a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates.</p> <p>Conclusion: The Auditor reviewed policies, procedures, inmate records, conducted interviews, and determined the facility meets the requirements of this standard.</p>
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115.251	Resident reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

115.251 Inmate Reporting

Policy, Materials, Interviews and Other Evidence Reviewed:

MDOC Inmate Handbook

Discharge Reporting Information

SOP 20-14 Sexual Abuse and Sexual Harassment of Inmates (PREA)

New Employee PREA Training

PREA Signage

Interviews

Grievance Form

MOU- Mississippi Coalition Against Sexual Assault

PREA standard 115.251 states facilities must provide multiple avenues for inmates to privately report sexual abuse and sexual harassment, retaliation for reporting sexual abuse and sexual harassment, and if there is staff neglect or violation of responsibilities. The facility designates multiple avenues for the internal reporting of sexual abuse and harassment, retaliation by inmates or staff, as well as avenues for reporting conditions that may have contributed to the alleged abuse.

The MDOC PREA plan states that inmates may privately report sexual abuse, sexual harassment, retaliation by other inmates or staff for reporting sexual abuse or sexual harassment. Inmates can report staff neglect or dereliction of duty that may have contributed to such incidents verbally, in writing, anonymously, or through third parties. Inmates can file reports through verbal and written reports to any staff member, MDOC Sexual TIPS Line, via third parties, or inform investigative staff.

The inmate grievance procedure allows inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates, retaliation from staff for reporting sexual abuse and sexual harassment, and/or any staff neglect or violation of responsibilities that may have contributed to such incidents. Inmates are not required to resolve an incident of sexual abuse or sexual harassment with staff or submit the grievance to the staff member who is the subject of their sexual abuse or sexual harassment allegation. Grievances regarding sexual abuse or sexual harassment will not be referred to the staff member who is the subject of the grievance and they will not be charged for filing a grievance regarding sexual abuse or sexual harassment unless it is determined that it was filed in bad faith.

Staff will document and forward the complaint to the appropriate supervisory staff for investigation. Inmates may report sexual abuse or sexual harassment to the PREA TIP hotline. Upon receipt of a complaint, the complaint will immediately be forwarded to the institutional PREA Manager. Staff interviewed were aware of their obligations to accept and forward all reports from inmates and were aware of the responsibilities documenting each written report. Staff may confidentially report

	<p>sexual abuse or harassment of inmates either verbally or in writing to their supervisors, or directly to their Major or Higher-level staff. Staff can also report sexual abuse or harassment through the MDOC website www.mdoc.ms.gov, and staff members are informed of these reporting avenues during annual institutional PREA training. Staff stated during interviews they are aware they can contact any facility management level employee, PREA manager, or PREA coordinator, to report sexual abuse or harassment of inmates. The agency does not hold individuals for civil immigration purposes, and none were housed at the facility during the audit period.</p> <p>Conclusion:</p> <p>The Auditor reviewed the agency's policies, procedures, inmate handbook, conducted interviews, and determined the facility meets the requirements of this standard.</p>
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115.252	Exhaustion of administrative remedies
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>115.252 Exhaustion of Administrative Remedies</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>PAQ</p> <p>MDOC Policy Grievance and Informal Resolution Procedure for Inmate</p> <p>Inmate Handbook</p> <p>SOP 20-14 Sexual Abuse and Sexual Harassment of Inmates (PREA)</p> <p>Observations</p> <p>Interviews</p> <p>Agency policy states that the facility has a grievance procedure in place for addressing inmate grievances regarding sexual abuse. If inmates utilize the grievance system to report an allegation of sexual abuse, the grievance will forward the sexual abuse allegation to the facility PM for further handling in accordance with this policy and the inmate will be notified in writing that this has occurred. The inmates are not required to use an informal grievance process to resolve an alleged incident of sexual abuse and are not required to submit grievance to a staff member who is the subject of a complaint. The facility issues a final decision within 90 days of the initial filing of the grievance which does not include the inmate's time</p>

	<p>preparing an administrative appeal. If the facility requests an extension to respond, it will notify the inmates in writing of the extension and provide a date by which a decision will be made.</p> <p>Third parties are permitted to assist inmates in filing requests for administrative remedies and can file requests on behalf of inmates. Emergency grievances may be filed if an inmate alleges that they are at substantial risk of imminent sexual abuse which are immediately forwarded for review at which initiate a response within 48 hours</p> <p>Conclusion:</p> <p>Based on the review of policies, and interviews, the facility has demonstrated compliance with all the provisions and meets this standard.</p>
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115.253	Resident access to outside confidential support services
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>115.253 Inmate Access to Outside Confidential Support Services</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive 20-14.01 Sexual Abuse and Sexual Harassment of Inmates (PREA)</p> <p>Policy Directive 20-14-.01 Inmate Telephone Use and Mail Handling</p> <p>PREA Posters (English and Spanish)</p> <p>Inmate Handbook</p> <p>Interviews</p> <p>PAQ</p> <p>MOU - MS. Coalition Against Sexual Assault</p> <p>The facility works to establish relationships with outside support services as required by Standard 115.253. Mississippi Coalition Against Sexual Assault advocate services provides confidential emotional support services to facility inmates and rape crisis management. These services included referral to survivor outreach services, suicide prevention and providing immediate emotional support services. MDOC has established a MOU with MSCASA to provide confidential emotional support to inmate survivors of sexual abuse and sexual harassment housed within the MDOC.</p>

	<p>The Auditor observed the facility advertises the availability of these resources on inmate bulletin boards within the housing units, ensuring that the inmate population is informed of their availability. Inmates are made aware of how communications are monitored, and which lines of communication are not monitored for confidentiality purposes. Signage posted in the inmate housing units included statements that the calls may be anonymous and will not be monitored.</p> <p>Policy requires that inmates and staff be allowed to report sexual abuse or harassment confidentially and requires that medical and mental health personnel inform inmates of their limits of confidentiality. Inmates are informed of the services during intake and the facility provides inmates with information regarding confidential support services through the PREA brochure they receive during orientation.</p> <p>Conclusion: Based on policy review, interviews, and correspondence review, the Auditor determined the facility meets the requirements of this standard.</p>
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115.254	Third party reporting
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>115.254 Third-Party Reporting</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <p>Policy Directive 20-14.01 Sexual Abuse and Sexual Harassment of Inmates (PREA)</p> <p>MDOC Website</p> <p>PREA TIP Line Posters (English and Spanish)</p> <p>Interviews</p> <p>PAQ</p> <p>Inmate Handbook</p> <p>Inmate Tablets</p> <p>The Auditor reviewed the MDOC operating procedure and Prohibited Sexual Conduct Involving Inmates policy which states inmates may report allegations of conducted prohibited. Threats of such conduct and retaliation for reporting such conduct can be reported verbally or in writing to any facility staff member, through the MDOC Sexual Abuse Hotline, TIP Line numbers, and third-party avenues.</p>

	<p>The facility responded that they provide a method to receive third-party reports of inmate sexual abuse or sexual harassment. The facility provided samples of items that can be completed on behalf of alleged sexual abuse or sexual harassment victims. Third parties can use the MDOC's website to report PREA allegations electronically on behalf of inmates. The facility also responded positively in the questionnaire that the agency publicly distributes information on how to report inmate sexual abuse or sexual harassment on behalf of inmates. Inmates, staff, or the third parties can report PREA allegations through the PREA TIP line or electronically through the Mississippi corrections website.</p> <p>Conclusion:</p> <p>The Auditor reviewed materials, policies, and determined the facility meets requirements for the standard.</p>
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115.261	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.261 Staff and Agency Reporting Duties</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive 20-14.01 Sexual Abuse and Sexual Harassment of Inmates (PREA)</p> <p>Reporting Serious or Unusual Incident</p> <p>SOP 20-14-01 PREA (Staffing and Agency Reporting Duties)</p> <p>Training Curriculum</p> <p>Training Records</p> <p>Interviews</p> <p>Standard 115.261 requires confidentiality of all information of sexual abuse or harassment beyond what is required to be shared as a part of the reporting, treatment, or investigation. MDOC states that reasonable steps should be taken to ensure the confidentiality of information obtained during the risk assessment process and from reports of conduct prohibited by this policy and any resulting investigations. Individuals interviewed as part of an investigation should be specifically warned not to discuss the investigation with others and staff that intentionally compromise this confidentiality will be subject to discipline in accordance with the "Employee Discipline" policy. This does not prevent staff from discussing such matters with their attorneys or in accordance with this or any other policy directive.</p>

	<p>MDOC requires staff report sexual abuse and sexual harassment immediately to a supervisor or other staff member of a higher rank. Once the abuse is reported, staff are instructed and required by policy not to discuss the situation/allegation with anyone else unless those staff are investigating, making security decisions, or providing services to the inmate victim. During the interviews, the Auditor determined all staff were clear that they should report any suspicions they have regarding sexual abuse or sexual harassment of an inmate. Staff understand the need to keep the information limited to those that need to know to preserve the integrity of the investigation. Staff interviewed stated that details related to either inmate allegations or staff allegations should remain confidential, and they would only discuss details with supervisors and investigators. The PREA Coordinator and facility investigator verified that investigative files are securely maintained with limited access.</p> <p>The policy states that staff, volunteers, and contractors must immediately report to their supervisor, or the OIC, any knowledge or suspicion of sexual abuse or sexual harassment and if applicable, an incident report will be submitted. Policy requires that all medical and mental health personnel inform inmates of the mandatory reporting requirements and limits of confidentiality to victims of sexual abuse. Policy requires medical and mental health care staff to report any knowledge of sexual abuse within an institutional setting and clinicians are required to disclose their duties to report.</p> <p>Conclusion:</p> <p>It was determined through review of policies and interviews with staff, the facility meets the provisions for the standard.</p>
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115.262	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.262 Agency Protection Duties</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive Inmate Placement and Transfer</p> <p>Policy Directive 20-14.01 Sexual Abuse and Sexual Harassment of Inmates (PREA)</p> <p>Interviews</p> <p>PAQ</p> <p>Sexual Assault checklist</p>

	<p>Coordinated Response</p> <p>MDOC Operating Procedure is written in compliance with Standard 115.262 and requires that whenever there is a report of an incident of sexual abuse or harassment, the victim should be immediately protected. Policy states that when an inmate is subject to substantial risk of imminent sexual abuse or is the alleged victim of sexual abuse, the facility will take immediate action to protect the inmate by ensuring no contact between the alleged abuser and the alleged victim. Such actions can include housing changes, temporary segregation, reassignment, and transfers.</p> <p>Staff interviewed by the Auditor were able to explain requirements regarding what immediate actions were required if staff learned an inmate was at imminent risk of sexual abuse. Supervisory staff interviewed by the Auditor were knowledgeable of the options they have available to protect inmates, which included relocation to a different housing unit at the assigned facility or transfer to another facility. Each decision on reassignments would be determined case-by-case basis and the Major will review the proposed actions within 48 hours to ensure appropriate measures have been taken to protect potential victims.</p> <p>PREA directives require medical and mental health staff to immediately consult with the Major or designee and recommend housing interventions or other immediate action to protect the inmate when it is determined there is a substantial risk. If medical staff determine during an assessment that an inmate is at risk of imminent sexual abuse or is considered at risk sexual victimization, they will collaborate closely with the Major and unit team to provide alternative housing placement.</p> <p>Conclusion:</p> <p>The Auditor reviewed agency policy, procedures, conducted interviews, and determined the facility meets the requirements of this standard.</p>
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115.263	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.263 Reporting to Other Confinement Facilities</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive 20-14.01 Sexual Abuse and Sexual Harassment of Inmates (PREA)</p>

	<p>PAQ</p> <p>Screening Instrument</p> <p>Interviews</p> <p>The MDOC's policy is written in accordance with the PREA Standard 115.263 and requires that if the Major receives an allegation regarding an incident of sexual abuse that occurred at another facility, the receiving facility must make notification within 72 hours. The standard states that if an inmate alleges, they were sexually abused while confined at a different facility, including county jails, state prison, federal prison, or substance abuse program facility, staff will forward the allegation to the Administrator at the inmate's current facility. Whether or not the inmate indicates the allegation was investigated, the Major will provide email notification within 72 hours, to the Warden where the incident was alleged to have occurred.</p> <p>The Auditor conducted interviews with facility staff and asked what actions they would take if an inmate allegedly had been sexually abused while confined at another facility. Each staff member stated they would immediately report the allegation to their supervisor and submit an incident report including the details of the allegation as reported to them. The Major stated that if the inmate alleges sexual abuse at another facility, they will place a telephone call followed by an email to Warden at the facility of the allegation to complete the notification process. The Major stated they would ensure their facility investigator is notified, and an investigation would immediately be conducted.</p> <p>Conclusion:</p> <p>Compliance with this standard was verified by reviewing policy, conducting interviews, and determining that the facility meets the requirements of this standard.</p>
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115.264	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.264 Staff First Responder Duties</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Investigator Training</p> <p>20-14.01 Sexual Abuse and Sexual Harassment of Inmates (PREA)</p> <p>MDOC Sexual Violence Response Investigation Guide</p>

	<p>PREA Course Curriculum</p> <p>Staff Training Rosters</p> <p>Interviews</p> <p>PREA Response card</p> <p>Sexual Assault Checklist</p> <p>Coordinated Response Plan</p> <p>Investigator Certification</p> <p>MDOC policy requires that if the first responder is not a security staff member, they immediately notify a security staff member. The Auditor conducted interviews with security personnel and asked what actions they would take following an alleged sexual abuse that is reported to them. Staff stated they would ensure the victim remains with them and immediately inform a supervisor and would also request the victim not take action to destroy evidence.</p> <p>The Auditor reviewed the facility's training records and verified that sexual abuse training had been conducted, and training was documented. The training records of staff verified they had received training to appropriately respond to incidents of sexual abuse. The Auditor determined the facility has trained its staff in their responsibilities as a first responder to an incident of sexual abuse. Staff interviewed as part of this onsite audit visit were all well versed in their responsibilities as a first responder to an allegation of sexual abuse or sexual harassment.</p> <p>The Auditor conducted interviews with supervisory staff to determine what their role would be following a report of sexual assault. The supervisors stated that they would ensure the alleged victim and alleged abuser were removed from the area where the incident occurred and kept separately in the facility. The area would be secured, and a staff would ensure no one entered the area and disturb the evidence. The alleged victim would be referred to medical for treatment of any emergency needs and transported to the local hospital for a forensic exam if warranted.</p> <p>Conclusion: The Auditor reviewed policies, procedures, Coordinated Response Plan, Sexual Assault Response Checklist, conducted interviews, and determined the facility meets the requirements of this standard.</p>
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115.265	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	<p>115.265 Coordinated Response</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Operating Procedure-20-14 Prohibited Sexual Conduct Involving Inmates</p> <p>Interviews</p> <p>Coordinated Response Plan</p> <p>Staff Training Roster</p> <p>Sexual Assault Checklist</p> <p>PAQ</p> <p>Standard 115.265 requires each facility to develop a written plan to coordinate actions taken in response to an incident of sexual abuse. The facility has developed its own operating procedures for the coordinated response plan. MDOC policy describes the procedures employed by the facility when responding to allegations of sexual abuse among supervisory, investigative staff and facility leadership. A sexual assault first responder checklist has been created which supplements the facility operating procedures and outlines staff duties in response to a sexual assault incident. Each correctional facility includes in their operating procedures an institutional plan to coordinate actions taken in response to an allegation of sexual abuse. The plan includes Staff, First Responder (Security/Non-Security), OIC, Medical Response, Investigator, Mental Health, PREA Compliance Manager, and administrative response.</p> <p>The Auditor conducted interviews with staff listed in the facility's coordinated response plan and staff were knowledgeable regarding their specific duties. The Auditor determined the facility has prepared its staff to take appropriate actions in response to sexual abuse. The Auditor interviewed the Major, investigator, and PM, regarding the initiation of the coordinated response in the case of an allegation of sexual abuse or harassment. They all understood their responsibilities and stated that all investigations are completed, and a finding would be assigned. They stated that it may be referred to as criminal prosecution or managed administratively.</p> <p>Conclusion:</p> <p>The Auditor determined the facility maintains an appropriate response plan that coordinates the actions of personnel following an incident of sexual abuse. Based on a review of policies, procedures, Coordinated Response Plan, Sexual Assault Response, training records, and interviews with staff, the Auditor determined that facility meets the requirements of this standard.</p>
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	abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.266 Preservation of Ability to Protect Inmates from Contact with Abusers:</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Staff Interviews</p> <p>Operating Procedure-20-14 Prohibited Sexual Conduct Involving Inmates</p> <p>PAQ</p> <p>A review indicated that there are no collective bargaining agreements that preserve the ability of the Agency to remove alleged staff abusers from contact with inmates, consistent with provisions of the standard. Specifically, when warranted, the facility may take actions that include suspension of an employee during an investigation and this suspension may continue until disciplinary actions are determined. The Agency Head confirmed that the agency maintains the right to assign staff.</p> <p>This Auditor confirmed that the facility has the right and ability as the employer to remove alleged staff abusers from contact with inmates. When warranted, the employer may take actions that include suspension of an employee during an investigation and this suspension may continue until the time when disciplinary actions are determined.</p> <p>Conclusion:</p> <p>The Auditor finds the facility compliant with this standard and meets the requirements.</p>

115.267	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.267 Agency Protection Against Retaliation</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <p>SOP-20-14, Prohibited Sexual Conduct Involving Inmates</p> <p>PREA Sexual Abuse Retaliation Monitoring</p>

Interviews

Retaliation Monitoring Form

PAQ

The MDOC's policy is written in accordance with Standard 115.267 and states retaliation by or against any party, staff, or inmate, who participates in a complaint or report of sexual abuse or sexual harassment, will be strictly prohibited. PREA policy states that both staff and inmates who cooperate with sexual abuse and sexual harassment investigations will be protected from retaliation from staff and inmates. The agency designates a supervisory staff member, other than the direct supervisor, to monitor the incident. They will monitor retaliatory performance reviews, reassignments, and other retaliatory actions not substantiated as legitimate discipline or performance based. Supervisory staff will also monitor disciplinary sanctions, housing or program changes, and conduct periodic status checks for inmates who report or have reported alleged victimization. The facility has protection and reporting measures for inmates. The policy outlines the protection measures available and requires the prompt remediation of any type of retaliation. Any use of involuntary segregated housing for the inmates who alleged suffering sexual abuse will only be used after an assessment.

The PM monitors retaliation for up to 90 days and retaliation may be monitored beyond 90 days, if warranted. If a staff member were involved, the staff member would be separated from the inmate and may receive disciplinary action commensurate with the type of behavior taken. If an inmate retaliates against another inmate, they would be kept separate from one another. Other options to protect against retaliation may include protective custody, housing reassignments, or transfer to another facility. Supervisory staff will also monitor disciplinary sanctions, housing, or program changes, and conduct periodic status checks for inmates who report or have reported alleged victimization. Retaliation will be grounds for disciplinary action and will be investigated.

If any individual who cooperates with an investigation expresses a fear of retaliation, the facility will take measures to protect that individual against retaliation, including ninety-calendar day retaliation monitoring. Retaliation monitoring will cease if an allegation is unfounded. Retaliation will be grounds for disciplinary action and will be investigated and any other individual who cooperates with an investigation expresses a fear of retaliation, the facility will take appropriate measures to protect that individual against retaliation, including 90 calendar day retaliation monitoring if deemed necessary and retaliation monitoring ceases when an allegation is unfounded. Administrative staff have the authority to move inmates within the facility or to request transfers to other facilities or take other measures to ensure inmates are not retaliated against

Conclusion:

The Auditor reviewed documents and determined the facility is compliant with this standard.

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115.271	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.271 Criminal and Administrative Agency Investigations</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive-Sexual Abuse and Harassment of Inmates</p> <p>SOP-20-14, Prohibited Sexual Conduct Involving Inmates</p> <p>MDOC Sexual Violence Response and Investigation Guide</p> <p>Interviews</p> <p>MDOC Operating Procedure is written in accordance with Standard 115.271 and states that all investigations into allegations of sexual abuse and sexual harassment will be completed promptly, thoroughly, and objectively, including third party and anonymous reports. These documents indicate that when an allegation of sexual abuse or sexual harassment is received, whether reported verbally or in writing, it will be investigated. Staff will ensure all allegations are referred to the appropriately in accordance with policy in conjunction with the facility's administrative investigation.</p> <p>The Major will refer the allegation no later than 72 hours after the report was made to the CID by creating an entry for each alleged incident. Facility policy requires that all reports, regardless of their source of origination, be referred for investigation. MDOC policy requires administrative investigations to include efforts to determine whether staff actions or failure to act contributed to sexual abuse. Investigative reports are required to include a description of physical evidence, testimonial evidence, credibility assessments, and investigative findings. Credibility assessments are conducted as part of the investigative process with the institutional investigators, and the assessments are conducted on all involved parties during an investigation.</p> <p>Investigations go through specific levels of review to ensure thoroughness of the investigation. The agency is required to maintain written investigative reports for as long as the alleged abuser is incarcerated or employed by the facility, plus additional time in accordance with MDOC policy. Policy prohibits the termination of an investigation if an inmate is released, or a staff member is terminated or resigns. All inmate interviews are documented, and the investigative files are secured in a locked area with limited access.</p>

	<p>Conclusion:</p> <p>The Auditor reviewed policy, investigators credentials, training, and confirmed the facility meets requirements for this standard.</p>
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115.272	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.272 Evidentiary Standard for Administrative Investigations</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Operating Procedure-20-14 Prohibited Sexual Conduct Involving Inmates</p> <p>Basic Investigator Manual</p> <p>Interviews</p> <p>Investigators' Certifications</p> <p>SOP 20-14-01 PREA (Evidentiary Standards for Administrative Investigations)</p> <p>Interviews with the investigator and PM confirmed that staff responsible for administrative adjudication of investigations are knowledgeable of the requirements for the evidentiary standard. Investigators interviewed were able to explain what preponderance meant and how they arrive at the basis of case determinations. The Auditor reviewed protocols for substantiated and unsubstantiated allegations, including the basis for the determinations which indicated that the investigations would be conducted in accordance with the standard.</p> <p>Conclusion: Based on policy review, and interviews, the Auditor determined the facility meets the requirements of this standard.</p>

115.273	Reporting to residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	<p>115.273 Reporting to Inmates</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive-20-14 PREA and Prohibited Sexual Conduct Involving Inmates</p> <p>Inmate Notification of Sexual Abuse and Sexual Harassment Investigative Findings and Action</p> <p>Interviews</p> <p>MDOC SOP Investigation</p> <p>The MDOC policy requires an inmate to be notified when a sexual abuse allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation. Policy states that following an investigation of an allegation that an inmate suffered sexual abuse in a facility, the Major will ensure the victim is notified in writing as to whether the allegation has been Substantiated, Unsubstantiated, or Unfounded.</p> <p>Following an allegation that a staff member committed sexual abuse against an inmate, the facility conducting the investigation will inform the inmate of their determination and such notifications will be documented using the appropriate form. If notification is unable to be provided, the attempts will be documented. The facility's obligation to provide notification as outlined in this section will terminate if the inmate is paroled, discharged from their sentence, or pardoned.</p> <p>Conclusion:</p> <p>Interviews with the PM, administrative staff, and investigator verified that inmates would receive notifications. The Auditor determined the facility meets compliance with the standard.</p>
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115.276	Disciplinary sanctions for staff
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>115.276 Disciplinary Sanctions for Staff</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive 20-14.01 PREA and Prohibited Sexual Conduct Involving Inmates</p> <p>Policy Directive Employee Discipline</p>

	<p>MDOC Policy Sexual Misconduct with Inmates</p> <p>MDOC Employee Handbook</p> <p>Interviews</p> <p>PAQ</p> <p>MDOC policies were reviewed and met the requirements of Standard 115.276. Staff found guilty of violations are subject to disciplinary sanctions up to and including termination for violating the sexual abuse or sexual harassment policies. Policy requires that staff found responsible for sexual abuse of an inmate will be terminated from employment and employees who are found to have violated agency policy related to sexual abuse and harassment but not actually engaging in sexual abuse will be disciplined in a manner commensurate with the nature and circumstances or the acts. MDOC policy states that termination is the presumptive disciplinary action for staff who engage in sexual abuse in compliance with the standard. These cases will be referred for criminal prosecution and will be reported to any relevant licensing bodies. Additionally, disciplinary sanctions will take into consideration the staff member's disciplinary history, sanctions imposed for similar offenses by other staff, and serious nature of the acts committed.</p> <p>The Major stated that if a staff member is terminated for violating the facility's sexual assault and harassment policy, and if the conduct is criminal in nature, it would be referred for criminal prosecution. The facility investigator and PM verified that if an employee under investigation resigns before the investigation is complete, or resigns in lieu of termination, the resignation does not terminate the investigation or the possibility of prosecution if the conduct is criminal in nature. The facility would still refer the case for prosecution when a staff member terminates employment that would have otherwise been terminated for committing a criminal act of sexual abuse or sexual harassment.</p> <p>Conclusion: Interviews with the Major, Investigator, and PM, support that all allegations against staff for sexual abuse, sexual harassment, retaliation, or neglect, are investigated and disciplinary action sanctioned. The Auditor determined the facility meets compliance with the standard.</p>
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115.277	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.277 Corrective Action for Contractors and Volunteers</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p>

	<p>Policy Directive 20-14.01 PREA and Prohibited Sexual Conduct Involving Inmates</p> <p>MDOC Policy Corrective and Disciplinary Action</p> <p>MDOC Policy Sexual Misconduct with Offenders</p> <p>Interviews</p> <p>Staff Roster</p> <p>Training Roster</p> <p>MDOC policy mandates contractors and volunteers be held to the same standards as employees directly hired by the Agency when it comes to disciplinary action for engaging in sexual abuse and sexual harassment. Any contractor or volunteer engaging in these behaviors would be terminated or prohibited from entering an MDOC facility. Facility policy contains specific language to provide consideration for terminating contracts and prohibiting further contact with inmates in the case of any violation of PREA sexual abuse and sexual harassment policies. Conduct of this nature by volunteers or contractors requires reports to law enforcement and relevant licensing bodies and may include criminal charges.</p> <p>Contractual Employees' allegations of employee misconduct must be documented, investigation conducted, and the contracting agency may perform a separate investigation and remove the employee. Whether a contractual employee should remain at a particular facility will be determined by the Major and will vary depending on the severity of the alleged misconduct. Contractual employees who are the subject of an investigation are permitted to have representation during the investigatory interview and the investigator must advise the employee. The contract employee is responsible for obtaining their representative and that person cannot be an MDOC employee.</p> <p>The Major confirmed that any contractor or volunteer who violates sexual abuse or sexual harassment policies would be removed from inmate contact and facility depending on substantiation of the allegations. Contractors and volunteers who violate the sexual abuse or sexual harassment policies will have their security clearance revoked immediately. Contract staff could be terminated by the contract employer and if the conduct is criminal in nature, it will be referred to CID for investigation and prosecution.</p> <p>Conclusion:</p> <p>The Auditor reviewed documentation, policy, and interviewed staff, and determined the standard meets compliance.</p>
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	<div data-bbox="279 114 983 152">Auditor Overall Determination: Meets Standard</div> <div data-bbox="279 192 564 230">Auditor Discussion</div> <div data-bbox="279 271 888 309">115.278 Disciplinary Sanctions for Inmates</div> <div data-bbox="279 342 1115 380">Policy, Materials, Interviews and Other Evidence Reviewed:</div> <div data-bbox="279 414 1420 452">Policy Directive 20-14.01 PREA and Prohibited Sexual Conduct Involving Inmates</div> <div data-bbox="279 486 912 524">Policy Directive-Inmate Disciplinary Offenses</div> <div data-bbox="279 557 879 595">MDOC SOP Discipline Procedures-Inmates</div> <div data-bbox="279 629 427 667">Interviews</div> <div data-bbox="279 701 534 739">Inmate Handbook</div> <div data-bbox="279 772 339 810">PAQ</div> <div data-bbox="279 844 1468 1131"><p>The MDOC has zero tolerance for inmate-on-inmate sexual harassment, assault, or abuse. MDOC policy directives state that consensual sexual activity among inmates is prohibited and if an inmate is found to have engaged in sexual activity, the inmate will be subject to disciplinary action. If an inmate reports sexual abuse and the report is made in good faith, based upon a reasonable belief that the alleged conduct occurred, they will not be charged for reporting if it is determined to be unfounded.</p></div> <div data-bbox="279 1164 1481 1664"><p>If it is determined that the inmate did commit sexual abuse in the correctional setting, they will be subject to disciplinary sanctions commensurate with the level of the infraction, and other disciplinary sanctions of others with the same or similar infractions for those who violate sexual abuse and sexual harassment policies. In addition to potential disciplinary segregation, inmates may have their custody levels raised or may be transferred to another location. The Auditor found no evidence to suggest that an inmate has received a disciplinary charge for making an allegation of sexual abuse or sexual harassment in good faith. There is a consideration of mental disabilities and mental illness when considering the appropriate type of sanction to be imposed. Policy states that facilities offering relevant treatment to address the underlying reasons or motivations for abuse, will consider placing offending inmates into such programs.</p></div> <div data-bbox="279 1697 1479 1904"><p>The facility prohibits sexual activity between all inmates and inmates who engage in consensual sexual activity may be disciplined and sanctioned according to MDOC policy. However, the activity will not be considered sexual abuse unless it is determined that sexual contact was the result of coerced consent or protective pairing.</p></div> <div data-bbox="279 1937 1407 2018"><p>Conclusion: Based on policy review and interviews, the Auditor determined the facility meets the requirements of this standard.</p></div>
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115.282	Access to emergency medical and mental health services
	<p data-bbox="279 185 981 219">Auditor Overall Determination: Meets Standard</p> <p data-bbox="279 264 564 297">Auditor Discussion</p> <p data-bbox="279 338 1222 371">115.282 Access to Emergency Medical and Mental Health Services</p> <p data-bbox="279 412 1114 445">Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p data-bbox="279 486 807 519">Policy Directive-Medical Emergencies</p> <p data-bbox="279 560 1102 593">MDOC-20-14 Prohibited Sexual Conduct Involving Inmates</p> <p data-bbox="279 633 427 667">Interviews</p> <p data-bbox="279 707 504 741">Risk Screenings</p> <p data-bbox="279 781 480 815">SANE Protocol</p> <p data-bbox="279 855 1481 1126">The MDOC policy is written in compliance with the Standard 115.282 and states that all victims of sexual abuse will receive timely, unimpeded access to emergency medical treatment and crisis intervention services. In accordance with Health Services policy, “Medical Emergencies” and “Mental Health Services,” inmate victims of sexual abuse will receive timely emergency medical treatment and crisis intervention services, the nature and scope of which will be determined by medical and mental health staff.</p> <p data-bbox="279 1167 1474 1576">If no qualified medical or mental health staff are available at the time an allegation of recent abuse is made, custody staff first responders will take preliminary steps to protect the victim in accordance with the Protective custody section of this manual and will immediately provide notification to the appropriate medical and mental health staff. Inmate victims of sexual abuse while incarcerated will be offered information about and access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with policy on “Health Care Management of Reported Sexual Assaults of Inmates MDOC Facilities.” Treatment services will be provided to the victim without financial cost regardless of whether the victim names the abuser or cooperates with any investigation of the incident.</p> <p data-bbox="279 1617 1465 1776">For services that are outside the scope of their experience, the inmate can be treated at the local hospital emergency department. Forensic exams are conducted off-site by qualified forensic nurse examiners, and an advocate is available at the request of the inmate to provide emotional support services.</p> <p data-bbox="279 1816 1474 2013">Agency policy states that forensic examinations will be performed by Sexual Assault Forensic Examiners (SAFE’s) or Sexual Assault Nurse Examiners (SANE) at a local hospital without a financial cost to the victim. The facility has an established practice of providing timely and unimpeded access to emergency medical and crisis intervention when initiated.</p> <p data-bbox="279 2054 443 2087">Conclusion:</p>

	Staff interviews verified medical services are provided regardless of the inmates' cooperation with the investigation. The Auditor determined the facility meets compliance for this standard.
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115.283	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.283 Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive-Health Services</p> <p>Policy Directive 20-14-PREA and Prohibited Sexual Conduct Involving Inmates</p> <p>Interviews</p> <p>SANE Protocol</p> <p>PAQ</p> <p>MDOC Operating Procedure is written in compliance with Standard 115.283 which states that the facility will offer medical and mental health evaluation and treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility. The evaluation and treatment of such victims will include follow-up services, treatment plans, and referrals for continued care following their transfer or release. Interviews with staff confirm that these services would be available to inmates who have been victims of sexual abuse, and these services would be consistent with the community level of care.</p> <p>MDOC policy states that 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 practitioner's judgment. Policy requires treatment services to be consistent with the community level of care and provided without financial costs regardless of whether the victim names the aggressor or cooperates with any investigation arising out of the incident. If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual violence is made, the first responders will take preliminary steps to protect the victim and will immediately notify the shift supervisor. Inmates are offered mental health and medical services, and forensic and sexual assault exams are to be conducted by medical personnel.</p> <p>The Auditor interviewed staff who confirmed that counseling sessions, referrals, and</p>

	<p>follow-up services are provided when requested. The mental health practitioner also creates treatment plans and follow-up treatment plans. Staff confirmed the requirement to conduct the evaluation within 60 days of learning about the abuse and stated the assessment would be conducted sooner. Institutional staff feel the care provided to the inmates is much better than the community level of care. They indicated the immediate availability and broad range of available services offered are typically not as easily or quickly accessible in the community.</p> <p>Conclusion: The Auditor reviewed policies, procedures, inmate records, conducted interviews, and determined the facility meets the requirements of this standard.</p>
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115.286	Sexual abuse incident reviews
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>115.286 Sexual Abuse Incident Reviews</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Policy Directive-20-14 PREA and Prohibited Sexual Conduct Involving Inmates</p> <p>Interviews</p> <p>The MDOC has a policy that governs the review of all substantiated or unsubstantiated allegations of sexual abuse. Policy states that the facility PM will coordinate a sexual abuse incident review at the conclusion of every sexual abuse investigation unless the allegations are determined to be unfounded. The review team consist of upper-level custody and administrative staff, with input from relevant supervisors, investigators, and medical and mental health practitioners.</p> <p>The PM stated any recommendations would be implemented, or the reasons for not doing so would be documented. The facility has appointed a team that conducts incident reviews at the conclusion of any sexual assault investigations. The team includes the PREA manager, Major, CDC Supervisor, and Health & Mental Health Services.</p> <p>Conclusion:</p> <p>Interviews with the Major, PREA coordinator, Incident Review team member, and PM, confirmed compliance and the facility meets requirements for this standard.</p>

115.287	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.287 Data Collection</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Operating Procedure-20-14 Prohibited Sexual Conduct Involving Inmates</p> <p>Annual Report</p> <p>Survey of Sexual Victimization (SSV)</p> <p>Interviews</p> <p>MDOC Website</p> <p>MDOC policy is consistent with the requirements of Standard 115.287 and states that the agency will collect annually uniform data for allegations of sexual abuse necessary to answer all questions from the most recent version of the Survey of Sexual Violence and complete an annual report based upon the statical data.</p> <p>The MDOC policy outlines the data collection process and states that allegations of sexual abuse reported to have occurred within facilities will be entered into the appropriate MDOC computerized database. The agency PC gathers data on each reported incident to aggregate an annual incident report which will include the data necessary to complete the SSV and the PM at each facility is responsible for reporting institutional data to the PC.</p> <p>The agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. Data from the previous calendar year is supplied to the Department of Justice no later than June 30th, if requested.</p> <p>Conclusion:</p> <p>Compliance was determined by review of annual reports, data, and interviews with the PREA coordinator. The Auditor determined the facility meets the requirements of this standard.</p>

115.288	Data review for corrective action
	Auditor Overall Determination: Meets Standard

	Auditor Discussion
	<p>115.288 Data Review for Corrective Action</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Operating Procedure-20-14 Prohibited Sexual Conduct Involving Inmates</p> <p>Interviews</p> <p>MDOC Website</p> <p>PAQ</p> <p>The PAQ confirmed that the agency reviews data annually to assess and improve the effectiveness of its sexual abuse prevention, detection and response policies and training. The review includes identifying problem areas, taking corrective action on an ongoing basis, and preparing an annual report of its findings and any corrective action. A review of the annual reports confirmed that the report contains information on MDOC's PREA efforts to include the actions taken in response to the previous PREA audits.</p> <p>The reports were reviewed and approved by the PREA coordinator and the Agency Head. This includes reviews of sexual abuse incidents, the Annual Report, the Survey of Sexual Victimization, and the annual review by the Major. All this information is then utilized to identify any trends and improve or update policies, procedures, and practices. The PC and the PM stated that each facility documents allegations and investigations in the centralized database which is used to review trends and any areas of concern.</p> <p>Conclusion:</p> <p>Based on interviews, review of Agency website and documents, the Auditor finds this standard compliant and meets requirements.</p>

115.289	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.289 Data Storage, Publication, and Destruction</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Operating Procedure-20-14 Prohibited Sexual Conduct Involving Inmates</p>

	<p>MDOC Website</p> <p>Interviews</p> <p>PAQ</p> <p>MDOC policy mandates that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be securely maintained. MDOC Operating Procedure is written in accordance with the standard that data collected pursuant to 115.287 will be made readily available to the public through the agency's website, excluding all personal identifiers, and after final approval by the Director. Policy states the agency will ensure all data collected is securely retained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.</p> <p>The PM and PC stated that all electronic data is maintained in a centralized system and all paper files are secured at the facility. The Auditor reviewed the website and confirmed previous annual reports are available to the public. The facility PM is responsible for reporting institutional data to the PC and is maintained by the PM. Aggregated sexual abuse data for the agency's annual report is compiled from investigative files, incident reviews, and other relevant documents. Agency and facility data is maintained electronically in secure servers which require a unique username and password to access.</p> <p>Conclusion: Based on a review of the PAQ, policies, agency website, and information obtained from staff interviews, the Auditor determined this standard is compliant and meets requirements.</p>
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115.401	Frequency and scope of audits
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>115.401 Frequency and Scope of Audits</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <p>Interviews</p> <p>Documentation Review</p> <p>PAQ</p> <p>MDOC Website</p> <p>The Auditor had access to all areas of the facility and was permitted to receive and copy of policies, procedures, and documents requested. The Auditor conducted private interviews and was able to receive confidential information/correspondence</p>

	<p>from inmates. Policies and secondary documentation were provided before the onsite tour and during the post audit. The facility staff facilitated the interviews in a timely and efficient manner and interviews with inmates confirmed they were aware of the audit and the availability to communicate with the Auditors.</p> <p>Prior to the on-site review, emails with the Auditor's contact information were sent to the facility to be posted in inmates living areas advising of the audit. These notices were sent to the agency and facility staff for posting six weeks prior to the onsite visit and were observed posted in various areas of the facility.</p> <p>Conclusion: The Auditor finds this standard to be compliant and meets requirements.</p>
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.403 Audit Contents and Findings</p> <p>The report is publicly available at the MDOC website: https://www.ms.gov/documents/corrections/ms_Correctional_Final_Report.</p>

Appendix: Provision Findings		
115.211 (a)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.211 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its community confinement facilities?	yes
115.212 (a)	Contracting with other entities for the confinement of residents	
	If this agency is public and it contracts for the confinement of its residents with private agencies or other entities, including other government agencies, has the agency included the entity's obligation to adopt and 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 residents.)	na
115.212 (b)	Contracting with other entities for the confinement of residents	
	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 residents.)	na
115.212 (c)	Contracting with other entities for the confinement of residents	
	If the agency has entered into a contract with an entity that fails to comply with the PREA standards, did the agency do so only in	na

	emergency circumstances after making all reasonable attempts to find a PREA compliant private agency or other entity to confine residents? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)	
	In such a case, does the agency document its unsuccessful attempts to find an entity in compliance with the standards? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)	na
115.213 (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 residents against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The physical layout of each facility?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the resident population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.213 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (NA if no deviations from staffing plan.)	na
115.213 (c)	Supervision and monitoring	
	In the past 12 months, has the facility 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 assessed, determined, and documented whether adjustments are needed to prevailing	yes

	staffing patterns?	
	In the past 12 months, has the facility 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 assessed, determined, and documented whether adjustments are needed to the resources the facility has available to commit to ensure adequate staffing levels?	yes
115.215 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip searches or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.215 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female residents, except in exigent circumstances? (N/A if the facility does not have female inmates.)	na
	Does the facility always refrain from restricting female residents' access to regularly available programming or other outside opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	na
115.215 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female residents?	yes
115.215 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enable residents to shower, perform bodily functions, and change clothing without non-medical 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 enable residents to shower,	yes

	perform bodily functions, and change clothing without non-medical 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?	
	Does the facility require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing?	yes
115.215 (e)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from searching or physically examining transgender or intersex residents for the sole purpose of determining the resident's genital status?	yes
	If the resident's genital status is unknown, does the facility determine genital status during conversations with the resident, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.215 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex residents in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
115.216 (a)	Residents with disabilities and residents who are limited English proficient	
	Does the agency take appropriate steps to ensure that residents 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: Residents who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that residents 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: Residents who are blind or have low vision?	yes

	Does the agency take appropriate steps to ensure that residents 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: Residents who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that residents 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: Residents who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that residents 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: Residents who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that residents 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 residents who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents 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 residents with disabilities including residents who: Who are blind or have low vision?	yes
115.216 (b)	Residents with disabilities and residents who are limited English proficient	

	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to residents who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.216 (c)	Residents with disabilities and residents who are limited English proficient	
	Does the agency always refrain from relying on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.264, or the investigation of the resident's allegations?	yes
115.217 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents 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 residents 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 residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two questions immediately above ?	yes
	Does the agency prohibit the enlistment of the services of any contractor who may have contact with residents 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 the services of any contractor who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of	yes

	force, or coercion, or if the victim did not consent or was unable to consent or refuse?	
	Does the agency prohibit the enlistment of the services of any contractor who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two questions immediately above ?	yes
115.217 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with residents?	yes
	Does the agency consider any incidents of sexual harassment in determining to enlist the services of any contractor who may have contact with residents?	yes
115.217 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with residents, does the agency: Perform a criminal background records check?	yes
	Before hiring new employees who may have contact with residents, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.217 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?	yes
115.217 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have in place a system for otherwise capturing such information for current employees?	yes
115.217	Hiring and promotion decisions	

(f)		
	Does the agency ask all applicants and employees who may have contact with residents 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 residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.217 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.217 (h)	Hiring and promotion decisions	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.218 (a)	Upgrades to facilities and technology	
	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 residents from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012 or since the last PREA audit, whichever is later.)	na
115.218 (b)	Upgrades to facilities and technology	
	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	na

	agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not installed or updated any video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012 or since the last PREA audit, whichever is later.)	
115.221 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	yes
115.221 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (NA if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	no
	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? (NA if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	yes
115.221 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes

	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.221 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.221 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.221 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	na
115.221 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.221(d) above).	na

115.222 (a)	Policies to ensure referrals of allegations for investigations	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.222 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.222 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for conducting criminal investigations. See 115.221(a).)	na
115.231 (a)	Employee training	
	Does the agency train all employees who may have contact with residents on: Its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents 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 residents on: Residents' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with	yes

	residents on: The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	
	Does the agency train all employees who may have contact with residents on: The dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with residents on: The common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with residents 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 residents on: How to avoid inappropriate relationships with residents?	yes
	Does the agency train all employees who may have contact with residents on: How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents?	yes
	Does the agency train all employees who may have contact with residents on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.231 (b)	Employee training	
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	yes
115.231 (c)	Employee training	
	Have all current employees who may have contact with residents 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,	yes

	does the agency provide refresher information on current sexual abuse and sexual harassment policies?	
115.231 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.232 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.232 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with residents 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 residents)?	yes
115.232 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.233 (a)	Resident education	
	During intake, do residents receive information explaining: The agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining: How to report incidents or suspicions of sexual abuse or sexual harassment?	yes
	During intake, do residents receive information explaining: Their rights to be free from sexual abuse and sexual harassment?	yes

	During intake, do residents receive information explaining: Their rights to be free from retaliation for reporting such incidents?	yes
	During intake, do residents receive information regarding agency policies and procedures for responding to such incidents?	yes
115.233 (b)	Resident education	
	Does the agency provide refresher information whenever a resident is transferred to a different facility?	yes
115.233 (c)	Resident education	
	Does the agency provide resident education in formats accessible to all residents, including those who: Are limited English proficient?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Are deaf?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Are visually impaired?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Are otherwise disabled?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Have limited reading skills?	yes
115.233 (d)	Resident education	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
115.233 (e)	Resident education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats?	yes
115.234 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.231, does the agency ensure that, to the extent	yes

	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 criminal or administrative sexual abuse investigations. See 115.221(a)).	
115.234 (b)	Specialized training: Investigations	
	Does this specialized training include: Techniques for interviewing sexual abuse victims?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(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 criminal or administrative sexual abuse investigations. See 115.221(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 criminal or administrative sexual abuse investigations. See 115.221(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 criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
115.234 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a).)	yes
115.235 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	na

	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.)	na
	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.)	na
	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.)	na
115.235 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency does not employ medical staff or the medical staff employed by the agency do not conduct forensic exams.)	na
115.235 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	na
115.235 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.231? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)	na
	Do medical and mental health care practitioners contracted by	na

	and volunteering for the agency also receive training mandated for contractors and volunteers by §115.232? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)	
115.241 (a)	Screening for risk of victimization and abusiveness	
	Are all residents assessed during an intake screening for their risk of being sexually abused by other residents or sexually abusive toward other residents?	yes
	Are all residents assessed upon transfer to another facility for their risk of being sexually abused by other residents or sexually abusive toward other residents?	yes
115.241 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.241 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
115.241 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The age of the resident?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The physical build of the resident?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization:	yes

	Whether the resident's criminal history is exclusively nonviolent?	
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident 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 residents for risk of sexual victimization: Whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the resident about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the resident 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 residents for risk of sexual victimization: Whether the resident has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The resident's own perception of vulnerability?	yes
115.241 (e)	Screening for risk of victimization and abusiveness	
	In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse?	yes
	In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior convictions for violent offenses?	yes
	In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: history of prior institutional violence or sexual abuse?	yes
115.241 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the resident's arrival at the facility, does the facility reassess the resident's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

115.241 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess a resident's risk level when warranted due to a: Referral?	yes
	Does the facility reassess a resident's risk level when warranted due to a: Request?	yes
	Does the facility reassess a resident's risk level when warranted due to a: Incident of sexual abuse?	yes
	Does the facility reassess a resident's risk level when warranted due to a: Receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness?	yes
115.241 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that residents are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.241 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents?	yes
115.242 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents 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 § 115.241, with the goal of keeping separate those residents 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 § 115.241, with the goal of keeping separate those residents 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 § 115.241, with the goal of keeping separate those residents 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 § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.242 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each resident?	yes
115.242 (c)	Use of screening information	
	When deciding whether to assign a transgender or intersex resident to a facility for male or female residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns residents 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 residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems?	yes
115.242 (d)	Use of screening information	
	Are each transgender or intersex resident's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
115.242 (e)	Use of screening information	
	Are transgender and intersex residents given the opportunity to shower separately from other residents?	yes
115.242	Use of screening information	

(f)		
	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 residents, does the agency always refrain from placing: lesbian, gay, and bisexual residents 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 residents 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 residents, does the agency always refrain from placing: transgender residents 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 residents 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 residents, does the agency always refrain from placing: intersex residents 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 residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
115.251 (a)	Resident reporting	
	Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.251 (b)	Resident reporting	

	Does the agency also provide at least one way for residents 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 resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
115.251 (c)	Resident reporting	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.251 (d)	Resident reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes
115.252 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident 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
115.252 (b)	Exhaustion of administrative remedies	
	Does the agency permit residents 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 a resident to use any informal grievance process, or to otherwise attempt to resolve	yes

	with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	
115.252 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: a resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.252 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by residents in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency determines that the 90-day timeframe is insufficient to make an appropriate decision and claims an extension of time (the maximum allowable extension is 70 days per 115.252(d)(3)), does the agency notify the resident 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 resident does not receive a response within the time allotted for reply, including any properly noticed extension, may a resident consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.252 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, permitted to assist residents 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 residents? (If a third party files such a request on behalf	yes

	of a resident, 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.)	
	If the resident declines to have the request processed on his or her behalf, does the agency document the resident's decision? (N/A if agency is exempt from this standard.)	yes
115.252 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that a resident 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 a resident 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 resident 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
115.252 (g)	Exhaustion of administrative remedies	
	If the agency disciplines a resident for filing a grievance related to	yes

	alleged sexual abuse, does it do so ONLY where the agency demonstrates that the resident filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	
115.253 (a)	Resident access to outside confidential support services	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by giving residents 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 enable reasonable communication between residents and these organizations, in as confidential a manner as possible?	yes
115.253 (b)	Resident access to outside confidential support services	
	Does the facility inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.253 (c)	Resident access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.254 (a)	Third party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of a resident?	yes
115.261 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or	yes

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

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

	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?	
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.264 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.265 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
115.266 (a)	Preservation of ability to protect residents from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no
115.267 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff?	yes

	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.267 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.267 (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 residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents 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 residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents 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 resident 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:4. Monitor resident 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 resident 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 reassignment of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.267 (d)	Agency protection against retaliation	
	In the case of residents, does such monitoring also include periodic status checks?	yes
115.267 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.271 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.221(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 115.221(a).)	yes
115.271 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.234?	yes
115.271 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial	yes

	evidence, including any available physical and DNA evidence and any available electronic monitoring data?	
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.271 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.271 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as resident or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.271 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.271 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.271	Criminal and administrative agency investigations	

(h)		
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.271 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.271(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.271 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation?	yes
115.271 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.221(a).)	yes
115.272 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.273 (a)	Reporting to residents	
	Following an investigation into a resident's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.273 (b)	Reporting to residents	
	If the agency did not conduct the investigation into a resident's allegation of sexual abuse in an agency facility, does the agency	yes

	request the relevant information from the investigative agency in order to inform the resident? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	
115.273 (c)	Reporting to residents	
	Following a resident'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 posted within the resident's unit?	yes
	Following a resident'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 a resident'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 a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.273 (d)	Reporting to residents	
	Following a resident's allegation that he or she has been sexually abused by another resident, 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 a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform	yes

	the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	
115.273 (e)	Reporting to residents	
	Does the agency document all such notifications or attempted notifications?	yes
115.276 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.276 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.276 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.276 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies, unless the activity was clearly not criminal?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.277 (a)	Corrective action for contractors and volunteers	

	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with residents?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.277 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with residents?	yes
115.278 (a)	Disciplinary sanctions for residents	
	Following an administrative finding that a resident engaged in resident-on-resident sexual abuse, or following a criminal finding of guilt for resident-on-resident sexual abuse, are residents subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.278 (b)	Disciplinary sanctions for residents	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories?	yes
115.278 (c)	Disciplinary sanctions for residents	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether a resident's mental disabilities or mental illness contributed to his or her behavior?	yes
115.278 (d)	Disciplinary sanctions for residents	
	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 resident to participate in such interventions as a	yes

	condition of access to programming and other benefits?	
115.278 (e)	Disciplinary sanctions for residents	
	Does the agency discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.278 (f)	Disciplinary sanctions for residents	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
115.278 (g)	Disciplinary sanctions for residents	
	Does the agency always refrain from considering non-coercive sexual activity between residents to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between residents.)	yes
115.282 (a)	Access to emergency medical and mental health services	
	Do resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.282 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.262?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.282 (c)	Access to emergency medical and mental health services	
	Are resident victims of sexual abuse offered timely information	yes

	about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	
115.282 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.283 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.283 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.283 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.283 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are resident 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 residents who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
115.283 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.283(d), do such victims receive timely and comprehensive	na

	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 residents 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.)	
115.283 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.283 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.283 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners?	yes
115.286 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.286 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.286 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes

115.286 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.286(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.286 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.287 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.287 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.287	Data collection	

(c)		
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.287 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.287 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for the confinement of its residents.)	na
115.287 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na
115.288 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.287 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 § 115.287 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 § 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes

115.288 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.288 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.288 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.289 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.287 are securely retained?	yes
115.289 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.289 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.289 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.287 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes

115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	no
	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
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with residents?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates, residents, and detainees permitted to send confidential information or correspondence to the auditor in the	yes

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