

# PREA Facility Audit Report: Final

**Name of Facility:** Howard County Maryland Department of Corrections

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 09/18/2017

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Johnitha Rothell McNair	<b>Date of Signature:</b> 09/18/2017

AUDITOR INFORMATION	
<b>Auditor name:</b>	McNair, Johnitha
<b>Address:</b>	
<b>Email:</b>	johnitha@comcast.net
<b>Telephone number:</b>	
<b>Start Date of On-Site Audit:</b>	07/25/2017
<b>End Date of On-Site Audit:</b>	07/26/2017

FACILITY INFORMATION	
<b>Facility name:</b>	Howard County Maryland Department of Corrections
<b>Facility physical address:</b>	7903 Waterloo Road, Jessup, Maryland - 20794
<b>Facility Phone</b>	410-313-5200
<b>Facility mailing address:</b>	
<b>The facility is:</b>	<input checked="" type="radio"/> County <input type="radio"/> Federal <input type="radio"/> Municipal <input type="radio"/> State <input type="radio"/> Military <input type="radio"/> Private for profit <input type="radio"/> Private not for profit
<b>Facility Type:</b>	<input type="radio"/> Prison <input checked="" type="radio"/> Jail

Primary Contact			
<b>Name:</b>	Renea Somerville	<b>Title:</b>	Corrections Program Supervisor II
<b>Email Address:</b>	rsomerville@howardcountymd.gov	<b>Telephone Number:</b>	410-313-5249

Warden/Superintendent			
<b>Name:</b>	Jack Kavanagh	<b>Title:</b>	Director
<b>Email Address:</b>	jkavanagh@howardcountymd.gov	<b>Telephone Number:</b>	410-313-5230

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

Facility Health Service Administrator			
<b>Name:</b>	Liane West	<b>Title:</b>	Health Services Administrator
<b>Email Address:</b>	lwest@howardcountymd.gov	<b>Telephone Number:</b>	410-313-5269

Facility Characteristics			
<b>Designed facility capacity:</b>	463		
<b>Current population of facility:</b>	321		
<b>Age Range</b>	Adults: 33	Youthful Residents: 17	
<b>Facility security level/inmate custody levels:</b>	Max, Min, Pre-release		
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	146		

AGENCY INFORMATION	
<b>Name of agency:</b>	Howard County Maryland Department of Corrections
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	7903 Waterloo Road, Jessup, Maryland - 20794
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

Agency Chief Executive Officer Information:			
<b>Name:</b>		<b>Title:</b>	
<b>Email Address:</b>		<b>Telephone Number:</b>	

Agency-Wide PREA Coordinator Information			
<b>Name:</b>	Renea Somerville	<b>Email Address:</b>	rsomerville@howardcountymd.gov



## AUDIT FINDINGS

### **Narrative:**

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

The PREA audit of the Howard County Department of Corrections (HCDOC) was conducted on July 25-26, 2015. The PREA Coordinator, the audit team at HCDOC, and the auditor commenced audit preparation approximately six weeks prior to the audit. This audit preparation consisted of: delivering signage and auditor contact information to be posted in the facility, clarification of questions related to the pre-audit questionnaire and supporting documents and review of the pre-audit questionnaire and supporting documentation. The audit consisted of a facility tour, documentation review, and observation of operational procedures; including video review, as well as inmate and staff interviews. The audit team consisted of three certified auditors and three additional staff to assist with interviews, documentation and organization. During the on-site portion of the audit and after its completion additional documentation was requested by the auditor and provided by the PREA Coordinator.

The on-site portion of the audit of the Howard County Department of Corrections took place on the dates of July 25 – 26, 2017. The audit team arrived at the facility at 8:00 a.m. on Tuesday and at 7:00 a.m. on Wednesday, in an effort to interview staff from the night shift. The team departed approximately 5:30 p.m. on Tuesday and approximately 3:00 p.m. on Wednesday. An entrance conference was held on the morning of July 25, 2017. In attendance were fourteen staff from Howard County Department of Corrections including, the Director, the Assistant Director, the Chief of Security and the PREA Coordinator. After the entrance conference a complete facility tour was conducted. During the tour, staff members were observed performing their daily routine and providing supervision of inmates during various activities. During the course of the on-site portion of the audit 53 randomly selected and specialized staff as well as 28 inmates were interviewed. Live and recorded footage of the surveillance cameras was viewed by the auditor. The responses of staff and residents during their interviews confirmed that all had received PREA training and were knowledgeable related to the federal requirements. Staff members were interviewed from all shifts. A random sampling of inmate files was reviewed. A random sampling of other facility documentation was reviewed. This sampling included, but was not limited to: logs, shift reports, incident reports, policies and procedures, training records/logs and training curriculum. The auditor found the staff and inmates to have an awareness and understanding of PREA. The staff understood their responsibilities to ensure a safe facility. They were also aware of reporting responsibilities, preservation of evidence, as well as how to appropriately respond to victims of sexual assault and/or harassment. All staff interviewed had been appropriately trained on how to identify signs of sexual assault and or harassment as well as the right of any person reporting sexual abuse/harassment to be free from retaliation for making reports. An exit meeting was held on July 26, 2017 with various members of the Director's management team. The Director, Chief of Security, and PREA Coordinator were among the staff at the exit. The recommendations from the previous audit were addressed; (1) Document meeting between Director and PREA Coordinator when reviewing annual staffing plan. (2) Implement periodic testing of all inmate phones and the numbers inmates have access to for reporting sexual abuse, sexual harassment or retaliation for reporting abuse. (3) Add mailing address to rape crisis center to inmate kiosk. (4) Include documentation of standard 115.63 in the PREA

policy or as a stand-alone policy. (5) Consider adding Coordinated Response to the CBF/HCDC Sexual Abuse Incident Sheet.

## AUDIT FINDINGS

### **Facility Characteristics:**

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

The Howard County Department of Corrections is located in Jessup, Maryland. The agency consists of one facility which houses inmates charged as adults with various security levels including: maximum, medium, medical, minimum and pre-release. The capacity of the facility is 461. The average population on the dates of the audit was 317. The population is made up of male and female inmates. The facility housing units are contained on two (2) levels consisting of seventeen (17) housing units. The agency operates the detention facility and the central booking facility for Howard County. As such, the PREA Coordinator operates as both PREA Coordinator and PREA Compliance Manager. The PREA Coordinator reports directly to Chief Executive Officer; Jack Kavanagh, Director, Howard County Department of Corrections.

The main detention center consists of 90 single cells, 66 double cells, 8 segregated cells, 2 infirmary cells and 227 dormitory beds. It is important to note that on several of the housing units bed space is increased by utilizing beds that are located on the dayroom floor of the units. Three recreation areas are located on the lower level adjacent to the housing units located there. There is 24 hour medical care provided by the facility. The jail has a total of 234 cameras with a retention time of 30 days. The cameras are monitored on all three shifts. Monitors are located at every officer station, control centers, shift leaders' offices as well as administrative offices.

Inmates are afforded weekly visits. Each visit may include up to 2 adults and 2 children. All regular visits are no-contact. Special visits may be approved by the Director. Under normal circumstances all visits, including special visits are no-contact. Special consideration may be given for contact visits between mothers and infants on a case-by case basis. Inmates may take advantage of numerous educational and support programs, including but not limited to: re-entry, life skills, thinking for a change, GED, and drug and alcohol addiction. For those who have demonstrated responsibility, exhibited good behavior, and program completion the facility operates a work release program that allows inmates to work in the community on various work assignments which they may continue upon release. The work program operates within various businesses for and throughout the County which enhances re-entry opportunities, supports success, and strengthens community relations.

## AUDIT FINDINGS

### Summary of Audit Findings:

The summary should include the number of standards exceeded, number of standards met, and number of standards not met, along with a list of each of the standards in each category. If relevant, provide a summarized description of the corrective action plan, including deficiencies observed, recommendations made, actions taken by the agency, relevant timelines, and methods used by the auditor to reassess compliance.

Auditor Note: No standard should be found to be "Not Applicable" or "NA". A compliance determination must be made for each standard.

<b>Number of standards exceeded:</b>	0
<b>Number of standards met:</b>	45
<b>Number of standards not met:</b>	0

The facility was found to be in compliance with all 43 standards. Additionally, the facility was compliant with Standards 115.401 and 115.403 for a total of 45 standards found to be compliant. The breakdown is as follows:

#### PREVENTION PLANNING (All were found to Meet Standards)

115.11  
115.12  
115.13  
15.14  
115.15  
115.16  
115.17  
115.18

#### RESPONSIVE PLANNING (All were found to Meet Standards)

115.21  
115.22

#### TRAINING AND EDUCATION (All were found to Meet Standards)

115.31  
115.32  
115033  
115.34  
115.35

#### SCREENING FOR RISK OF VICTIMIZATION AND ABUSIVENESS (All were found to Meet Standards)

115.41  
115.42  
115.43

#### REPORTING (All were found to Meet Standards)



115.51  
115.52  
115.53  
115.54

OFFICIAL RESPONSE FOLLOWING AN INMATE REPORT (All were found to Meet Standards)

115.61  
115.62  
115.63  
115.64  
115.65  
115.66  
115.67  
115.68

INVESTIGATIONS (All were found to Meet Standards)

115.71  
115.72  
115.73

DISCIPLINE (All were found to Meet Standards)

115.76  
115.77  
115.78

MEDICAL AND MENTAL HEALTH CARE (All were found to Meet Standards)

115.81  
115.82  
115.83

DATA COLLECTION AND REVIEW (All were found to Meet Standards)

115.86  
115.87  
115.88  
115.89

AUDIT AND CORRECTIVE ACTION (All were found to Meet Standards)

115.401  
115.403

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

<b>115.11</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Howard County Department of Corrections has a written policy that mandates zero tolerance of all forms of sexual abuse and sexual harassment. The agency employs an upper level staff person as the PREA Coordinator/Compliance Manager who reports directly to the Director. Policy A-033 provides the required PREA definitions and outlines the agency’s approach to implementing PREA standards as well as the guidelines and procedures for implementing the agency’s approach to preventing, detecting and responding to sexual abuse and sexual harassment. It also addresses Conduct and Performance; contains prohibited behaviors of staff; and includes sanctions for employees and inmates who have participated in the prohibited behaviors.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Howard County Department of Corrections Organizational Chart</li> <li>• Howard County Department of Corrections Job Description for PREA Coordinator/Compliance Manager</li> <li>• Interviews with PREA Coordinator</li> </ul>

115.12	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This standard is NOT APPLICABLE. The Howard County Department of Corrections has not entered into or renewed a contract for the confinement of inmates since August 20, 2012 and does not contract with other agencies for the confinement of inmates.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interviews with PREA Coordinator</li> </ul>

115.13	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of the agency staffing plan indicates the agency has adequate resources to meet its needs. The PREA Coordinator reviewed and approved the staffing plan. The review included facility physical layout, an assessment of the video monitoring system, telephone access, radio access, composition of the inmate population , and staffing levels. The facility never operates below the mandatory staffing level. Policy E-404 as written supports the proper supervision and monitoring of inmates. Interviews with staff and inmates indicate that unannounced rounds are regularly conducted. Interviews with the PREA Coordinator and the Director demonstrate compliance with the PREA Standard regarding ensuring adequate levels of staffing, and, where applicable, video monitoring, to protect inmates from sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring the facility has taken into consideration the following factors: (1) generally accepted juvenile detention and correctional/secure residential practices; (2) any judicial findings of inadequacy; (3) any findings of inadequacy from Federal investigative agencies; (4) any findings of inadequacy from internal or external oversight bodies; (5) all components of the facility’s physical plant (including “blind spots” or areas where staff or residents may be isolated; (6) the composition of the resident population; (7) the number and placement of supervisory staff; (8) institution programs occurring on a particular shift; (9) any applicable State or local laws, regulations, or standards; (10) the prevalence of substantiated and unsubstantiated incidents of sexual abuse; and (11) any other relevant factors. Documentation of unannounced rounds that cover all shifts was reviewed; both the documentation and a review of video confirmed the practice.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy E-404</li> <li>• Howard County Department of Corrections Shift Leader Post Orders</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Howard County Department of Corrections Organizational Chart</li> <li>• Howard County Department of Corrections Staffing Analysis</li> <li>• Review of Unannounced Rounds documentation</li> <li>• Interviews with Inmates</li> <li>• Interviews with Random Staff and Intermediate and Upper Level Staff</li> <li>• Interviews with PREA Coordinator and Director</li> </ul>

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The facility demonstrated compliance with this standard. Policy H- 716 requires that youthful offenders not reassigned to a juvenile justice facility be housed in a designated juvenile housing unit, administrative segregation, or transferred to a neighboring jurisdiction that has a designated juvenile housing unit. A review of documentation including all files of youthful offenders admitted to the facility since the previous PREA Audit in July of 2015 supported proper screening and classification of the youthful offender inmates.</p> <p>Additionally, Policy H-716 requires that subsequent classification changes required the Director’s approval. Housing classification supports sight and sound separation of youthful offenders from adult inmates. There were no youthful offenders in the facility at the time of the audit. Facility policy and interviews support that direct supervision is provided at all times when youthful inmates are in programming areas where adult inmates may also be.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy H-716 Housing of Juveniles</li> <li>• Observations made during the Audit Tour</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Review of Inmate Files</li> <li>• Interviews with Intermediate and Upper Level Staff</li> <li>• Interviews with PREA Coordinator and Director</li> </ul>

115.15	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy E-402 addresses this standard. All staff interviewed reported that they received cross-gender pat-down search training. Staff also reported an understanding of searching transgender and intersex inmates in a professional and respectful manner consistent with security needs. Interviews of staff and inmates indicate that inmates are permitted to shower, dress, and use the toilet privately, without being viewed by staff of the opposite gender. Outside of each housing unit is a bright red applique reminding staff to announce their presence when entering the housing unit, if the staff are of the opposite gender of the inmates housed on the housing unit. The applique was clearly posted at the entry of each housing unit; as observed by the auditor during the tour. It was also observed during the tour that opposite gender staff announced their presence verbally as they entered the housing units with inmates of the opposite gender. These announcements were observed by the auditor during the tour of all areas of the facilities and confirmed by staff and inmates. Staff reported an awareness and understanding of the policy stating the prohibition of searching transgender or intersex inmates to determine genital status. PREA posters were clearly posted throughout the facility and on each housing unit. Posters were in English and Spanish. The inmate orientation video is also in English and Spanish. Inmates requiring interpreting services are afforded such through a company called Language Select.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy E-402</li> <li>• Observations made during the Audit Tour</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Review of Inmate Files</li> <li>• Interviews with Random staff; Intermediate staff; and Upper Level Staff</li> <li>• Interviews with PREA Coordinator and Director</li> </ul>

<b>115.16</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy H-736 Limited English Proficiency addresses the requirements of this standard. The Howard County Department of Corrections takes appropriate steps to ensure inmates with disabilities and inmates with limited English proficiency have an opportunity to participate in and benefit from the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. PREA handouts, postings and inmate handbooks are in English and Spanish. Inmates requiring interpreter services are provided these services through the Department's contract with Language Select. Inmate and staff interviewed confirmed their knowledge of the Department's policy and access to resources as needed. Howard County also employs staff who are bi-lingual and assist in the effective communication with inmates. Staff interviewed were all aware that under no circumstances are inmate interpreters or assistants to be used in dealing with any PREA related matter.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy H-736</li> <li>• Observations made during the Audit Tour</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Review of Inmate Files</li> <li>• Interviews with Intermediate and Upper Level Staff</li> <li>• Interviews with PREA Coordinator and Director</li> </ul>

<b>115.17</b>	<b>Hiring and promotion decisions</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-017 addresses this standard. The Facility employs a Captain who is in charge of conducting background checks. An interview with her was conducted and confirmed that all components of this standard have been met. All employees, contractors, and volunteers have had background checks completed. All applicants are required to disclose misconduct prior to selection for promotion. All new employees and candidates for promotion must complete a PREA Mandated Disclosure Form which specifically addresses the questions in this standard. Background checks are required before approving a promotion. A tracking system is in place to ensure that updated background checks are conducted every five years. Policy states false information submitted by applicants is grounds for termination.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-017 Hiring and Promotion</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Review of Files</li> <li>• Interviews with Specialized Staff, Intermediate, and Upper Level Staff</li> <li>• Interviews with PREA Coordinator and Director</li> </ul>

<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The facility has an extensive and fully functional video and visual electronic monitoring/surveillance system in place. There have been no substantial expansions or updates of existing facilities since August 20, 2012. A total of 224 security cameras are utilized within the facility to enhance monitoring of inmates. The facility has plans to continue efforts in this vein which includes upgrades to camera system.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Observations made during the Audit Tour</li> <li>• Howard County Department of Corrections Policy E-404</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interviews with Intermediate and Upper Level Staff</li> <li>• Interviews with PREA Coordinator and Director</li> </ul>



115.21	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 and the memorandums of understanding with the Police Department and the Domestic Violence Center of Howard County address compliance with this standard. Medical and custody staff were interviewed concerning this standard and follow that standard as it relates to responding to an allegation of sexual abuse and ensuring access to forensic exams. Staff reported knowledge of the facilities' procedures to obtain usable physical evidence if sexual abuse is alleged. Policy directs staff to preserve evidence for collection by police and to collect evidence in an effort to prevent that evidence from being destroyed. All collected evidence will follow a strict chain of custody in an effort to maintain integrity during the investigatory process. Each staff in the facility wears a badge outlining the duties of the first responders. Staff was aware of the protocol. Specific actions and clinical decisions are required to determine if an inmate is to be transported to a local hospital to receive a SAFE exam. No SAFE exams were conducted within the last year. Arrangements have been made to transport inmates to Howard County General hospital in response to a sexual assault. The inmate will not be charged for any services related to PREA compliance. The facility has in place a Memorandum of Understanding with a local crisis center to provide outside confidential support services related to sexual abuse and harassment as well as victim advocacy services. Policy states "The Department shall request that a prompt, thorough, objective, and fair investigation be conducted by qualified law enforcement investigators for every allegation of sexual abuse." The Department has a Letter of Agreement with the Howard County Police Department for such investigations. further, the Department ensures that all allegations of sexual abuse involving potentially criminal behavior are referred for investigation by the Director/ Designee to the Howard County Police Department, and they promptly document all referrals. The agency imposes a standard of preponderance of the evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated. At no cost to the inmate, the facility administrator shall arrange for the victim to undergo a forensic medical examination. All collected forensic evidence must be secured and processed according to the facilities established plan for maintaining the chain of custody for criminal evidence. A written summary of all medical evidence and findings shall be completed and maintained in the detainee's medical record.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Review of Memorandums of Understanding</li> <li>• Interviews with PREA Coordinator and Director</li> </ul>

115.22	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 directs the referrals of allegations for investigations and ensures that all allegations of sexual abuse and sexual harassment are administratively and or criminally investigated. Allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations (Howard County Police Department) unless the allegation does not involve potentially criminal behavior. The agency documents all referrals of allegations of sexual abuse or sexual harassment for criminal investigation. In the past 12 months, there were 16 allegations of sexual abuse received by the facility. 16 allegations were referred for administrative investigation and one (1) allegation was referred for criminal investigation. Additionally, the agency's policy regarding the referral of allegations of sexual abuse or sexual harassment for a criminal investigation is published on the agency website. Interviews with the Director and the PREA Coordinator and random staff confirmed their knowledge and understanding of, as well as their compliance with the policy's requirements. All criminal investigations are handled by the Howard County Police Department. All investigations are initiated immediately upon referral.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Review of Inmate Files/Investigations</li> <li>• Interviews with Inmates</li> <li>• Review of Memorandum of Understanding with Howard County Police Department</li> <li>• Interviews with PREA Coordinator and Director</li> </ul>

115.31	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 and the Training Modules (Employee Training) cover the agency’s requirements for staff training. The training curriculum, staff training records and staff interviews indicate that at a minimum, staffs receive PREA training during staff orientation and annually during refresher training. The training curriculum provided covered: the agency’s zero tolerance policy, fulfilling responsibilities related to preventing, detecting, reporting, and response procedures; inmates' rights to be free from sexual abuse and sexual harassment; the inmates of inmates and employees to be free from retaliation for reporting sexual abuse or sexual harassment; the dynamics of sexual abuse and harassment in confinement facilities; the common reactions of sexual abuse and sexual harassment victims; detecting and responding to signs of actual and threatened sexual abuse; avoiding inappropriate relationships with inmates, communicating professionally and respectfully with inmates, including those inmates who are lesbian, gay, bisexual, transgender, intersex and gender non-conforming inmates; how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities; and relevant laws regarding the applicable age of consent. The training is tailored to the unique needs and attributes and gender of the residents at the facility. Employees who are reassigned from facilities housing the opposite gender are given additional training. Between trainings the agency provides employees who may have contact with residents with refresher information about current policies regarding sexual abuse and harassment through shift briefings and regular meetings. The frequency with which employees who may have contact with residents receive refresher training on PREA requirements is annually and more frequently as needed. The agency ensures that employees who may have contact with residents understand the training they have received through employee signature.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy -033</li> <li>• Observations made during the Audit Tour</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Review of Inmate Files</li> <li>• Interviews with Intermediate and Upper Level Staff</li> <li>• Interviews with PREA Coordinator and Director</li> </ul>

115.32	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>As stated in the agencies policy A-033 All contractors and volunteers who have contact with inmates have been trained on their responsibilities under the agency’s policy related to the prevention, detection, and response to sexual abuse and sexual harassment prevention. Interviews of two contracted nurses demonstrated their knowledge of PREA and their responsibilities related to PREA compliance.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County department of Corrections Policy A-033</li> <li>• Training Module for Employees</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Auditor review of training documentation</li> <li>• Auditor review of training curriculum</li> <li>• Interviews with staff</li> <li>• Interview with PREA Coordinator</li> </ul>

115.33	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Compliance with this standard is addressed in policies A-033 and H-736. Inmates receive PREA information during the intake process. The facility maintains a list of staff who are bi-lingual and or proficient in sign language to assist in the appropriate delivery of information to inmates. Further, the department contracts with a vendor for outside interpreting services which are available 24 hours a day and seven days a week. In addition to the initial information inmates receive at intake, inmates watch a video which provides information and all inmates must attend PREA training which is held weekly. Each housing unit had zero tolerance posters and information related to the PREA hotline visible and accessible. Inmates also have the ability to email an administrator using the kiosk available on the unit. When an inmate emails an administrator via the kiosk, the email and its status as to whether it has been read or not is captured in the system. The Director reviews that status of the emails to ensure integrity of the system. Additionally, each time an inmate makes a telephone call an automated message delivers PREA information. Interviews of the inmates confirmed their understanding of their rights to be free from sexual harassment and abuse as well as their right to be free from retaliation for reporting incidents of sexual harassment and abuse. Various staff interviews also supported compliance with this standard.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Policy H-36</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Auditor review of inmate education materials</li> <li>• Auditor review of inmate files</li> <li>• Interviews with Staff</li> <li>• Interviews with Inmates</li> <li>• Interviews with PREA Coordinator</li> </ul>

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Howard County Department of Corrections refers all aspects of the investigatory process related to sexual assault and sexual harassment to the Howard County Police Department. Two administrators have successfully completed the online training from NIC as it relates to conducting sexual abuse investigations. While criminal investigations are turned over to the police, the agency does have two staff trained in investigations and documentation of said training is maintained at the facility.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Auditor review of resident education materials</li> <li>• Auditor review of training documents</li> <li>• Interviews with Staff</li> <li>• Interviews with PREA Coordinator</li> </ul>

<b>115.35</b>	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy I-811 27.14 addresses this standard. The facility uses policies provided by the medical agency. Documentation shows that the medical and mental health staff members have completed training required by policy. The facility nurses do not conduct forensic medical examinations. Interviews with medical, mental health staff and facility leadership support that they have a full understanding of the training they received as well as their roles and responsibilities as they relate to PREA response.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy I-811 27.14</li> <li>• Howard County Department of Correction Pre-Audit Questionnaire</li> <li>• Interviews with Medical and Mental Health Staff</li> <li>• Interview with PREA Coordinator</li> <li>• Review of Training Certifications for all medical and mental health staff</li> </ul>

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 outlines that all inmates are assessed during intake and receive a screening for their risks of being sexually abused by other inmates or sexually abusive towards other inmates. Policy C-200 requires that the risk assessment for victimization and abusiveness is completed within 72 hours. Policy D-300 addresses required reassessments and guidelines. No inmates required reassessment during the past 12 months. The intake process was reviewed and observed by the auditor. The intake process was in keeping with the PREA standards. The screening tool included questions regarding disabilities and whether or not the inmate disclosed their sexual orientation/gender identity. The tool also asked whether inmates had previously experienced sexual victimization. The perception of the inmate regarding his or her vulnerability was also considered. The screening and intake process was well managed. Information gathered from the intake process was maintained confidentially and only disclosed to those staff with a need to know basis.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Policy D-300</li> <li>• Howard County Department of Corrections Policy C-200</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Review of screening tool</li> <li>• Review of completed Inmate screenings</li> <li>• Auditor Interviews with Staff</li> <li>• Auditor Interviews with Random Inmates</li> <li>• Auditor Interviews with PREA Coordinator</li> </ul>

<b>115.42</b>	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy D-300 addresses the requirements of this standard. A review of the risk screening form indicated the facility uses the information from the screening tool to determine housing, cell, work, education, and program assignments. The facility's goal is to keep inmates at high risk of being sexually victimized separate from those who are at a high risk of being sexually abusive. Guidelines on housing and program assignments and for the management of transgender and intersex inmates are outlined in this policy. At the present time, the facility does not have any transgender or intersex inmates. All housing and program assignments are made on a case by case basis. Interviews with staff and inmates confirmed compliance with the facility's policy which is in keeping with the expectations of this standard.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy D-300</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Review of Risk Assessment documentation</li> <li>• Interviews with PREA Coordinator</li> <li>• Interviews with Staff</li> <li>• Interviews with Inmates</li> <li>• Auditor observation of physical plant</li> <li>• Review of facility schematics</li> </ul>



<b>115.43</b>	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Agency Policy D-300 states inmates at high risks for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. Reviews of protective custody status will take place at least every 30 days. Interviews with staff indicated there have been no inmates placed in this status within the previous year.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy D-300</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Review of Risk Assessment documentation</li> <li>• Interviews with PREA Coordinator</li> <li>• Interviews with Staff</li> <li>• Interviews with Residents</li> <li>• Auditor observation of physical plant</li> <li>• Review of facility schematics</li> </ul>

<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Howard County Department of Corrections provides multiple internal ways for inmates to report sexual abuse, sexual harassment and incidents of retaliation. Inmates and staff interviews confirm that inmates are able to make reports verbally, in writing, anonymously and through third party reporting. Inmates may make calls through the inmate phone system where they have access to both internal and external hotlines. Both hotlines were tested by the auditor and were confirmed to be working properly. The auditor called the external hotline and went through a “test” report. An administrator from the hotline was interviewed and confirmed the elements of the Memorandum of Understanding that was in place to provide advocacy, emotional support, counseling and other assistance to inmates who might need the services. Inmates also have the ability to email administrators through the kiosk system. A demonstration of the kiosk system was performed by the PREA Coordinator/compliance Manager.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy D-300</li> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections PREA Brochure</li> <li>• Reviewed ICE Handbook - English 3-9-17.pdf</li> <li>• Auditor’s observations</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Auditor Review of forms and reporting documentation</li> <li>• Interviews with Inmates</li> <li>• Interviews with Staff</li> <li>• Interview with PREA Coordinator</li> </ul>

115.52	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policies A-033 and H-70 provide the administrative process for dealing with resident grievances regarding sexual abuse. Inmates are provided information as to how to file a grievance during the intake process and again during Inmate education. The PREA Coordinator reports and the Policy states that there is no time limit for a resident to submit a grievance regarding an allegation of sexual abuse. The agency does not require any inmate to use an informal grievance process, or otherwise to attempt to resolve with staff, an alleged incident of sexual abuse. Further, the agency allows for an inmate to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. Decisions on the merits of any grievance or portion of a grievance alleging sexual abuse is made within 90 days of the filing of the grievance. In the past 12 months there have been no grievances filed that alleged sexual abuse. In the past 12 months there were no grievances alleging sexual abuse that reached a final decision within the 90 days after being filed. In the past 12 months there were no grievances filed alleging sexual abuse that involved extensions because a final decision was not reached within 90 days. Policy permits third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse, and to file such requests on behalf of residents. Policy requires that if the resident declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents a resident's decision to decline. There have been no grievances alleging sexual abuse filed by residents in the past 12 months in which the resident declined third-party assistance, containing documentation of a resident's decision to decline. Lastly, policy limits disciplining an inmate for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the resident filed the grievance in bad faith. In the past 12 months there have been no resident grievances alleging sexual abuse that resulted in disciplinary action by the agency against the resident for having filed the grievance in bad faith.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of corrections Policy A-033</li> <li>• Howard County Department of Corrections Policy H- 707</li> <li>• Interviews with Staff</li> <li>• Interviews with Residents</li> <li>• Interview PREA Coordinator</li> </ul>

115.53	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 demonstrates compliance with this standard. The Domestic Violence Center of Howard County is used for confidential reporting and outside confidential support services. The inmates have access to contact information for crisis intervention, advocacy, and support services. Interviews found that inmates were aware that service were available and provided to them free of charge if they requested them. The memorandum of Understanding was presented to and reviewed by the auditor. Additionally, interviews with Center personnel confirmed their commitment to provide said services to the inmates. The interview also revealed that the crisis center will respond to Howard County General Hospital when notified by the facility of an alleged incident. Further, Howard County General Hospital policy requires all sexual assaults to be reported to the Domestic Violence Center which establishes a check and balance further ensuring intervention, advocacy, and crisis support for inmates that experience abuse. The interview revealed that counseling and support is also available to inmates having previously experienced sexual assault and or abuse. The willingness and availability of the Domestic violence Center to provide support and services to the facility in various capacities establishes a concrete support system for the inmates.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Observations of the auditor made during the Facility Tour</li> <li>• Memorandum of Understanding with the Domestic Violence Center of Howard County</li> <li>• Interviews with Inmates</li> <li>• Interview with staff from the Domestic Violence Center of Howard County</li> <li>• Interviews with Staff</li> <li>• Interview with PREA Coordinator</li> </ul>

<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Howard County Department of Correction's provides avenues to notify the public with information detailing how they may report sexual abuse, sexual harassment or incidents of retaliation on behalf of inmates housed by the Department. These avenues include information on the Department's website as well as a digital bulletin in the lobby of the facility which runs 24 hours a day, 7 days a week. The accessibility of information for those closest to the inmates provides them specifics on how they can report actual or suspected abuse. By using the website and the electronic bulletin the Department ensures the information is widely disseminated. Staff and inmate interviews revealed all were aware of an inmate's right to report sexual abuse or sexual harassment to others outside of the facility and the fact that the third party could make a report on behalf of the inmate.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interviews with Staff</li> <li>• Interviews with Residents</li> <li>• Interview with PREA Coordinator</li> </ul>

<b>115.61</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>All staff are required by Policy A-033 to immediately report any knowledge, suspicion or information they receive regarding sexual abuse and harassment, retaliation against inmates or staff who report any incidents, and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Interviews with staff verified that their awareness of their responsibility to report and further supported compliance with this standard.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interviews with Staff</li> <li>• Interviews with Residents</li> <li>• Interview with PREA Coordinator</li> </ul>

<b>115.62</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>All staff are required by Policy A-033 to immediately report any knowledge, suspicion or information they receive regarding sexual abuse and harassment, retaliation against inmates or staff who report any incidents, and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Interviews with staff verified that their awareness of their responsibility to report and further supported compliance with this standard.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interviews with Staff</li> <li>• Interviews with Residents</li> <li>• Interview with PREA Coordinator</li> </ul>

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>All staff are required by Policy A-033 to immediately report any knowledge, suspicion or information they receive regarding sexual abuse and harassment, retaliation against inmates or staff who report any incidents, and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Interviews with staff verified that their awareness of their responsibility to report and further supported compliance with this standard.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interviews with Staff</li> <li>• Interviews with Residents</li> <li>• Interview with PREA Coordinator</li> </ul>

115.64	<p><b>Staff first responder duties</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Policy A-033 requires staff to take specific steps to respond to a report of sexual abuse including; separating the alleged victim from the abuser; preserving any crime scene within a period of time that still allows for the collection of physical evidence; request the alleged victim not take any action that could destroy physical evidence; and ensure that the alleged abuser does not take any action to destroy physical evidence, if the abuse took place within a time period that still allows for the collection of physical evidence. Interviews with random and specialized staff confirmed that they were aware of their responsibilities when it comes to their duties as first responders. As a reminder of their first responder duties in the event of an incident each staff has a step-by-step first responder guide on the back of their badges. During staff interviews, they were able to speak to the aforementioned steps and their responses demonstrated a clear understanding of their roles as first responders. Medical and mental health personnel were able to speak to their roles as responders to an incident once notified by staff. Medical spoke to completing an initial assessment of injuries and rendering aid as required. Medical also stated that any incident requiring a forensic medical examination would be referred out to Howard General Hospital for examination by a Sexual Assault Forensic Examiner or Sexual Assault Nurse Examiner. In the past 12 months there no allegations or reports that an inmate was sexually abused. Additionally, agency policy requires that if the first responder is not a security staff member that responder shall notify security staff and be required to request the alleged victim not take any action that might destroy physical evidence.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interviews with Staff (Random, and Specialized)</li> <li>• Interview with PREA Coordinator</li> </ul>
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<b>115.65</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The facility has developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, law enforcement, and facility leadership. This plan is explained in Policy A-033 and details actions to be taken by staff first responders, medical, mental health, law enforcement and administrators. The policy also details the order of the response by action and who is responsible for each action. The plan was reviewed and is in compliance with this standard. Interviews with the Director and other staff including staff first responders, medical and mental health revealed that they are knowledgeable of their duties in response to an allegation of sexual abuse in keeping with the facility’s coordinated response plan, the policy and the PREA standards. The coordinated response plan, PREA policy and response of staff during interviews demonstrated compliance with this standard.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interview with Director of Howard County Department of Corrections</li> <li>• Interviews with Staff</li> <li>• Interview with PREA Coordinator</li> </ul>

<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Howard County Department of Corrections has not entered into or renewed any collective bargaining agreement or another agreement since August 20, 2012.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interview with Director of Howard County Department of Corrections</li> <li>• Interview with PREA Coordinator</li> </ul>



<b>115.67</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 requires the Director to ensure the protection of inmates and staff who have reported sexual abuse or harassment or who have cooperated in a sexual abuse or sexual harassment investigation. Policy states specifically: “The Department shall closely monitor the conduct or treatment of inmates or staff who report sexual abuse and of inmates who have suffered from sexual abuse and inmates who have cooperated with investigations for a minimum of 90 days (longer if necessary or if recommended by treatment staff) to see if there are changes that would be a result of retaliation by inmates or staff. Supervisors shall be designated by the Director as well as treatment staff to monitor such conduct”. The agency has multiple protection measures to employ in its efforts to protect staff and inmates. There were no incidents of retaliation in the past 12 months.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interview with PREA Coordinator</li> <li>• Interview with Director</li> </ul>

<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Howard County Department of Corrections does not have a policy prohibiting post allegation protective custody. As stated in Standard 115. 43: Agency Policy D-300 states inmates at high risks for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made; and a determination has been made that there is no available alternative means of separation from likely abusers. Reviews of protective custody status will take place at least every 30 days. No inmate has alleged sexual abuse in the past 12 months, protective custody has not been necessary.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy D-300</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interview with PREA Coordinator</li> <li>• Interview with Director</li> </ul>

<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 requires criminal investigations to be conducted by the Howard County Police Department. All substantiated investigations shall be referred for prosecution. Policy further requires staff members to cooperate with all investigations. There have been no substantiated allegations of conduct that appeared to be criminal that were referred for prosecution.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interview with PREA Coordinator</li> <li>• Interview with Director</li> </ul>

<b>115.72</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 demonstrates compliance with this standard. The policy states the agency shall impose a standard of preponderance of the evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interview with PREA Coordinator</li> <li>• Interview with Director</li> </ul>

<b>115.73</b>	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 demonstrates compliance with this standard. Policy requires that after an allegation of sexual abuse the inmate shall be informed as to whether the allegation was substantiated, unsubstantiated or unfounded. All such notifications and attempts of notifications shall be documented. In the last twelve months there were no investigations of alleged sexual abuse, as a result, there was no requirement for inmate notifications.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interview with PREA Coordinator</li> <li>• Interview with Director</li> </ul>

<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 outlines the agency’s disciplinary response related to violations of the PREA policy by staff. Specifically, disciplinary sanctions for staff may include termination. The policy states “Authorized personnel who become involved in sexual misconduct shall be subject to disciplinary action in accordance with Howard County Department of Corrections policy and Howard County Code, up to and including dismissal, and may be subject to prosecution under Maryland State Law”. In the past 12 months, no staff has been terminated or has resigned for violating the facility’s PREA policies; as such, no staff has been reported to law enforcement or licensing boards following termination. Nor has any staff been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policy in the past 12 months.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interview with PREA Coordinator</li> </ul>

<b>115.77</b>	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 states “Authorized personnel involved in sexual misconduct, who are not employees, shall lose their privilege to enter the facility. Any unethical act/behavior of sexual harassment or sexual misconduct committed by HCDC licensed professional staff or other authorized personnel shall, upon substantiated allegation, shall also result in reporting the matter to the professionals licensing agency.” Additionally, policy J902 governs volunteers, outside agencies and contracted staff. As cited in the previous standard, individuals who become involved in sexual misconduct may be subject to prosecution under Maryland State Law. During the past 12 months, no contractor or volunteer has been reported to law enforcement or any agency for allegations of sexual abuse.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Policy J-902</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interview with PREA Coordinator</li> </ul>

<b>115.78</b>	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy H-713 supports compliance with this standard. The policy prohibits all inmate sexual conduct. Inmates may receive disciplinary sanctions following a finding or a criminal investigation that an inmate engaged in sexual conduct. There were no findings or findings of guilt for inmate-on-inmate sexual abuse occurring at the facility in the past 12 months.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Policy H-713</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interview with PREA Coordinator</li> </ul>

<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 supports compliance with this standard. Inmates who disclosed prior sexual victimization are offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening. Medical and mental health staff maintain secondary materials documenting compliance with this standard. Inmates who disclosed previously perpetrating sexual abuse are offered a follow-up meeting with a mental health practitioner within 14 days. Interviews with medical and mental health staff confirm that informed consent is obtained from inmates who disclose prior victimization that did not occur in an institutional setting if the inmate is over the age of 18.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Auditor review of documentation</li> <li>• Interviews with Inmates</li> <li>• Interviews with medical and mental health staff</li> <li>• Interview with PREA Coordinator</li> </ul>

<b>115.82</b>	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 requires timely and unimpeded access to emergency medical treatment, crisis intervention services and victim advocacy services. The nature and scope of these services are determined by medical and mental health practitioners according to their professional judgement. Inmate victims of sexual abuse while incarcerated are offered timely access to appropriate medical treatment. The facility uses Howard County General Hospital for emergency medical services and they have a memorandum of understanding with Howard County Domestic Violence Center for the provision of emotional support, crisis response and mental health support. Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interviews with Medical Staff</li> <li>• Interview with PREA Coordinator</li> </ul>

<b>115.83</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 addresses this standard. Services provided by the Howard County Department of Corrections are consistent with community level of care without financial cost to the inmate. The facility uses Howard County General Hospital for emergency medical services and employs mental health staff for the well-being of inmates. The Department also maintains a memorandum of understanding with the Howard County Domestic Violence Center for additional mental health and emotional support. Compliance with this standard was further supported by interviews with medical and mental health staff as well as document reviews.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interviews with Medical Staff</li> <li>• Interview with PREA Coordinator</li> </ul>

<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 outlines compliance with this standard and provides information regarding the incident review team and its role in responding to and reviewing incidents. The Policy details the make-up of the sexual abuse incident review team and the elements to be considered in their assessments of incidents. Interviews with staff revealed that they understand the purpose of the incident review team and the process by which they are to follow in conducting the reviews.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interviews with Incident Review Team members</li> <li>• Interview with PREA Coordinator</li> <li>• Interview with Director</li> </ul>

<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy A-033 supports compliance with this standard. The agency collects accurate uniform data for every allegation of sexual abuse using a standardized instrument. The data is used to prepare an annual report. The PREA Coordinator reviews aggregate data on an annual basis and presents the findings to the Director for use in determining whether changes may be needed to existing policies and practices in order to further the goal of eliminating sexual abuse. The facility's aggregate data, after approval by the Director/designee is made available on the HCDC website.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interview with PREA Coordinator</li> <li>• Interview with Director</li> </ul>

<b>115.88</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Howard County Department of Corrections reviews the data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies. The PREA Coordinator will review the collected and aggregated data to assess and improve the effectiveness of the PREA related efforts and initiatives. This standard is supported by policy A-033.</p> <p>Evidence relied upon to make auditor determination:</p> <ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interview with PREA Coordinator</li> <li>• Interview with Director</li> </ul>

<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Howard County Department of Corrections reviews the data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies. The PREA Coordinator will review the collected and aggregated data to assess and improve the effectiveness of the PREA related efforts and initiatives. This standard is supported by policy A-033.
	Evidence relied upon to make auditor determination:
	<ul style="list-style-type: none"> <li>• Howard County Department of Corrections Policy A-033</li> <li>• Howard County Department of Corrections Pre-Audit Questionnaire</li> <li>• Interview with PREA Coordinator</li> <li>• Interview with Director</li> </ul>

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Howard County Department of Corrections was audited at least once during the first audit cycle. The facility was audited the second year of the first audit cycle and completed the second audit during the first year of the second audit cycle.

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	The Howard County Department of Corrections published the audit summary from the first audit cycle on the County website and may be found at:
	<a href="https://www.howardcountymd.gov/Departments/Corrections/Prison-Rape-Elimination-Act-PREA">https://www.howardcountymd.gov/Departments/Corrections/Prison-Rape-Elimination-Act-PREA</a>



## Appendix: Provision Findings

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

115.11 (b)	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes

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

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

115.12 (b)	<b>Contracting with other entities for the confinement of inmates</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates OR the response to 115.12(a)-1 is "NO".)	na

115.13 (a)	<b>Supervision and monitoring</b>	
	Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	Does the agency ensure that each facility has documented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the generally accepted detention and correctional practices in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any judicial findings of inadequacy in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from Federal investigative agencies in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from internal or external oversight bodies in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration all components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated) in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the composition of the inmate population in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into	yes

	consideration the number and placement of supervisory staff in calculating adequate staffing levels and determining the need for video monitoring?	
	Does the agency ensure that each facility's staffing plan takes into consideration the institution programs occurring on a particular shift in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any applicable State or local laws, regulations, or standards in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the prevalence of substantiated and unsubstantiated incidents of sexual abuse in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any other relevant factors in calculating adequate staffing levels and determining the need for video monitoring ?	yes

<b>115.13 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na

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

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

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

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

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

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

115.15 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates in non-exigent circumstances? (N/A here for facilities with less than 50 inmates before August 20,2017.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A here for facilities with less than 50 inmates before August 20,2017.)	yes

115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates?	yes

115.15 (d)	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility implement a policy and practice that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes

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

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

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

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

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

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



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

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

115.17 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with inmates, does the agency: perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency: consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes

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

115.17 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes

115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes

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

<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes

<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na

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

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

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

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

115.21 (d)	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes

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

115.21 (f)	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes

115.21 (h)	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.21(d) above.)	na

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

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

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

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

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

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

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

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

115.32 (b)	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes



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

<b>115.33 (a)</b>	<b>Inmate education</b>	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes

<b>115.33 (b)</b>	<b>Inmate education</b>	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes

<b>115.33 (c)</b>	<b>Inmate education</b>	
	Have all inmates received such education?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes

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

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

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

115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

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

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

115.35 (a)	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment?	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse?	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment?	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment?	yes

<b>115.35 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams.)	na

<b>115.35 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere?	yes

<b>115.35 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31?	yes
	Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.32?	yes

<b>115.41 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes

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

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

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

115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: history of prior institutional violence or sexual abuse?	yes

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

115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a: Referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Request?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes

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

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

<b>115.42 (a)</b>	<b>Use of screening information</b>	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes

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



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

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

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

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

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

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

115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The opportunities that have been limited?	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The duration of the limitation?	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The reasons for such limitations?	yes

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

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

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

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

<b>115.51 (b)</b>	<b>Inmate reporting</b>	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security?	yes

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

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

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

<b>115.52 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes

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

115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes

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

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

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



115.53 (a)	<b>Inmate access to outside confidential support services</b>	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies?	yes
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes

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

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

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

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

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

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

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

<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes

<b>115.62 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes

<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes

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

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

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

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

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

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

<b>115.66 (a)</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes

<b>115.67 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes

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

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

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

<b>115.67 (e)</b>	<b>Agency protection against retaliation</b>	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes

<b>115.68 (a)</b>	<b>Post-allegation protective custody</b>	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes

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

<b>115.71 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes

<b>115.71 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes

115.71 (d)	<b>Criminal and administrative agency investigations</b>	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes

115.71 (e)	<b>Criminal and administrative agency investigations</b>	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes

115.71 (f)	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes

115.71 (g)	<b>Criminal and administrative agency investigations</b>	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes

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



<b>115.71 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes

<b>115.71 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes

<b>115.71 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes

<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes

<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes

115.73 (c)	Reporting to inmates	
	Following a inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following a inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following a inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following a inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes

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

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

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

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

<b>115.76 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes

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

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

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

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

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

115.78 (c)	<b>Disciplinary sanctions for inmates</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes

<b>115.78 (d)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes

<b>115.78 (e)</b>	<b>Disciplinary sanctions for inmates</b>	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes

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

<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	Does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes

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

<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes

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

<b>115.81 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes

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

<b>115.82 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes

115.82 (b)	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes

115.82 (c)	<b>Access to emergency medical and mental health services</b>	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes

115.82 (d)	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes

115.83 (a)	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes

115.83 (b)	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes

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

<b>115.83 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.)	yes

<b>115.83 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if all-male facility.)	yes

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

<b>115.83 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes



<b>115.83 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes

<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes

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

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

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

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

115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes

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

<b>115.87 (c)</b>	<b>Data collection</b>	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes

<b>115.87 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes

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

<b>115.87 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na

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

<b>115.88 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes

<b>115.88 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes

<b>115.88 (d)</b>	<b>Data review for corrective action</b>	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes

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

<b>115.89 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes

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

<b>115.89 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes

<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	During the three-year period starting on August 20, 2013, and during each three-year period thereafter, 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.? (N/A before August 20, 2016.)	yes

<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	During each one-year period starting on August 20, 2013, 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?	no

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

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

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

<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes

<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports within 90 days of issuance by auditor. The review period is for prior audits completed during the past three years PRECEDING THIS AGENCY AUDIT. In the case of single facility agencies, the auditor shall ensure that the facility's last audit report was published. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or in the case of single facility agencies that there has never been a Final Audit Report issued.)	yes