#### **PREA Facility Audit Report: Final**

Name of Facility: Caddo Correctional Center Facility Type: Prison / Jail Date Interim Report Submitted: 04/25/2022 Date Final Report Submitted: 08/19/2022

## Auditor Certification The contents of this report are accurate to the best of my knowledge. No conflict of interest exists with respect to my ability to conduct an audit of the agency under review. I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template. Auditor Full Name as Signed: William Peck Date of Signature: 08/19/2022

AUDITOR INFORMATION	
Auditor name:	Peck, William
Email:	williamepeck@gmail.com
Start Date of On-Site Audit:	03/09/2022
End Date of On-Site Audit:	03/11/2022

FACILITY INFORMATION		
Facility name:	Caddo Correctional Center	
Facility physical address:	: 1101 Forum Drive, Shreveport, Louisiana - 71107	
Facility mailing address:	1101 Forum Dr, Shreveport, Louisiana - 71107	

Primary Contact	
Name: Nickie Mastrodomenico	
Email Address:	nickie.watson@caddosheriff.org
Telephone Number:	3186775254

Warden/Jail Administrator/Sheriff/Director	
Name: Rick Farris	
Email Address:	rick.farris@caddosheriff.org
Telephone Number:	3186775254

Facility PREA Compliance Manager	
Name:	Nickie Mastrodomenico
Email Address:	nickie.watson@caddosheriff.org
Telephone Number:	O: (318) 677-5264

Facility Health Service Administrator On-site	
Name: Kelli Hayes	
Email Address:	kelli.hayes@caddosheriff.org
Telephone Number:	(318) 677-5270

Facility Characteristics	
Designed facility capacity:	1500
Current population of facility:	1386
Average daily population for the past 12 months:	1400
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males
Age range of population:	32
Facility security levels/inmate custody levels:	5
Does the facility hold youthful inmates?	Yes
Number of staff currently employed at the facility who may have contact with inmates:	137
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	0
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	0

AGENCY INFORMATION	
Name of agency:	Caddo Parish Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	501 Texas Street, Shreveport, Louisiana - 71101
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:	
Name:	
Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information			
Name:	James Moore	Email Address:	james.moore@caddosheriff.org

# SUMMARY OF AUDIT FINDINGS The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met. Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited. Number of standards exceeded: 0 1 1 45 1 Number of standards not met: 1

#### **POST-AUDIT REPORTING INFORMATION**

#### **GENERAL AUDIT INFORMATION**

#### **On-site Audit Dates** 1. Start date of the onsite portion of the audit: 2022-03-09 2. End date of the onsite portion of the audit: 2022-03-11 Outreach 10. Did you attempt to communicate with community-based • Yes organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant O No conditions in the facility? a. Identify the community-based organization(s) or victim **Project Celebration** advocates with whom you communicated: **AUDITED FACILITY INFORMATION** 14. Designated facility capacity: 1400 15. Average daily population for the past 12 months: 1386 16. Number of inmate/resident/detainee housing units: 13 • Yes 17. Does the facility ever hold youthful inmates or youthful/juvenile detainees? O No C Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	1383
37. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:	0
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	0

40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0	
41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0	
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0	
43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	0	
44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0	
45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	0	
46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	0	
47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0	
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	0	
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit		
49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	137	
50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0	
51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0	
52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	The facility did not retain this information historically and it was uncollected at the onset of the audit. The PCM was replaced.	
INTERVIEWS		
Inmate/Resident/Detainee Interviews		

Random Inmate/Resident/Detainee Interviews			
53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	17		
54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE	Age		
interviewees: (select all that apply)	Race		
	Ethnicity (e.g., Hispanic, Non-Hispanic)		
	Length of time in the facility		
	Housing assignment		
	☐ Gender		
	C Other		
	None		
55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	Relatively equal numbers from each housing unit		
56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	⊙ Yes		
	O No		
57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.		
Targeted Inmate/Resident/Detainee Interviews			
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	20		
As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropric ross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee is satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segreg housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted populatior not applicable in the audited facility, enter "0".			
59. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:	5		
60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	2		

61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	1
62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<ul> <li>Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</li> <li>The inmates/residents/detainees in this targeted category declined to be interviewed.</li> </ul>
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	Verified by medical interview
63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	1
64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	3
65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	3
66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	2
67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	1
68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	3

69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<ul> <li>Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</li> <li>The inmates/residents/detainees in this targeted category declined to be interviewed.</li> </ul>
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	Segregation is not used for PC/Involuntary Segregation cases. Anyone in PC is in a single cell in general Populaltion with the same schedules and privileges as all offenders.
70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
71. Enter the total number of RANDOM STAFF who were interviewed:	12
72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	<ul> <li>Length of tenure in the facility</li> <li>Shift assignment</li> <li>Work assignment</li> <li>Rank (or equivalent)</li> <li>Other (e.g., gender, race, ethnicity, languages spoken)</li> <li>None</li> </ul>
73. Were you able to conduct the minimum number of RANDOM STAFF interviews?	© Yes © No
74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the sp	ecialized staff duties. Therefore, more than one interview protocol may

Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.

75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	10
76. Were you able to interview the Agency Head?	© Yes ⊙ No
a. Explain why it was not possible to interview the Agency Head:	Away from the City
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	© Yes © No
78. Were you able to interview the PREA Coordinator?	⊙ Yes ⊜ No
79. Were you able to interview the PREA Compliance Manager?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</li> </ul>

80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)	<ul> <li>Agency contract administrator</li> <li>Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment</li> <li>Line staff who supervise youthful inmates (if applicable)</li> <li>Education and program staff who work with youthful inmates (if applicable)</li> <li>Medical staff</li> <li>Mental health staff</li> <li>Non-medical staff involved in cross-gender strip or visual searches</li> <li>Administrative (human resources) staff</li> <li>Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff</li> <li>Investigative staff responsible for conducting administrative investigations</li> <li>Staff who perform screening for risk of victimization and abusiveness</li> <li>Staff on the sexual abuse incident review team</li> <li>Designated staff member charged with monitoring retaliation</li> <li>First responders, both security and non-security staff</li> <li>Other</li> </ul>
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	© Yes ⊙ No
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	© Yes © No
a. Enter the total number of CONTRACTORS who were interviewed:	1

b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all	Security/detention
that apply)	Education/programming
	Medical/dental
	✓ Food service
	Maintenance/construction
	Cther
83. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.

#### SITE REVIEW AND DOCUMENTATION SAMPLING

#### **Site Review**

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

84. Did you have access to all areas of the facility?	⊙ Yes
	C No
Was the site review an active, inquiring process that inclu-	uded the following:
85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage,	⊙ Yes
supervision practices, cross-gender viewing and searches)?	C No
86. Tests of all critical functions in the facility in accordance	⊙ Yes
with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support	C No
services, interpretation services)?	
87. Informal conversations with inmates/residents/detainees	⊙ Yes
during the site review (encouraged, not required)?	C No
88. Informal conversations with staff during the site review	⊙ Yes
(encouraged, not required)?	C No
89. Provide any additional comments regarding the site review	No text provided.
(e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	
Documentation Sampling	

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

90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	© Yes © No
91. Provide any additional comments regarding selecting	5 Investigation Files
additional documentation (e.g., any documentation you	5 HR Personnel Files
oversampled, barriers to selecting additional documentation,	The only barrier was lack of information on the part of the PCM as
etc.).	to categories of targeted offenders.

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

#### Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on- inmate sexual abuse	9	10	1	10
Staff-on-inmate sexual abuse	3	2	1	3
Total	11	12	2	13

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

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

#### **Sexual Abuse and Sexual Harassment Investigation Outcomes**

#### Sexual Abuse Investigation Outcomes

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

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

	Ongoing	Referred for Prosecution	Indicted/Court Case Filed	Convicted/Adjudicated	Acquitted
Inmate-on-inmate sexual abuse	2	1	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0	0
Total	2	1	0	0	0

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	2	2	4	2
Staff-on-inmate sexual abuse	0	1	2	0
Total	2	3	6	2

#### **Sexual Harassment Investigation Outcomes**

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	0	1	0
Staff-on-inmate sexual harassment	0	0	1	0
Total	0	0	2	0

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

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/sampled:	4
99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if you were unable to review any sexual abuse investigation files)</li> </ul>
Inmate-on-inmate sexual abuse investigation files	
100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	2
101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</li> </ul>
102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</li> </ul>
Staff-on-inmate sexual abuse investigation files	
103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	1
104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</li> </ul>
105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</li> </ul>
Sexual Harassment Investigation Files Selected for Revie	
106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	2

107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if you were unable to review any sexual harassment investigation files)</li> </ul>
Inmate-on-inmate sexual harassment investigation files	
108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	1
109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</li> </ul>
110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</li> </ul>
Staff-on-inmate sexual harassment investigation files	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	1
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</li> </ul>
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</li> </ul>
114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	No text provided.
SUPPORT STAFF INFORMATION	
DOJ-certified PREA Auditors Support Staff	

115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	© Yes ⊙ No
Non-certified Support Staff	
116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	© Yes © No
AUDITING ARRANGEMENTS AN	D COMPENSATION
121. Who paid you to conduct this audit?	<ul> <li>The audited facility or its parent agency</li> <li>My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)</li> <li>A third-party auditing entity (e.g., accreditation body, consulting firm)</li> <li>Other</li> </ul>

#### Standards

#### Auditor Overall Determination Definitions

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

#### **Auditor Discussion Instructions**

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The policy is clear and the PREA Compliance Manager (PCM) is clearly tasked with implementing a thorough compliance program. The Coordinator reports directly to the Jail Commander and so has access directly to the top leadership.
	The Agency Policy mandates zero tolerance of sexual abuse and sexual harassment toward any prisoner and defines the prohibited acts including sanctions. The Policy also outlines responsibilities of staff. CPSO designates a Sergeant to serve as the PREA Compliance Manager who reported that she has sufficient time and authority to coordinate the Facility's efforts to comply with the PREA Standards.
	The PREA Compliance Manager serves as a liaison between DOC's PREA Coordinator and other CPSO detention areas and is responsible for monitoring all PREA related activities.
	After completing the onsite audit and viewing the numerous changes that have occurred since the last audit, the Auditor concluded that much of the required liaison work has decreased and a number of PCM duties aimed at PREA oversight have been discontinued in recent years, compliance enforcement has deteriorated, programs have been allowed to disappear, and the PREA prevention and management is weaker than in the prior audit.
	The new PCM was assigned immediately following the last day of the audit and is developing a compliance plan to return the management of the PREA program to full strength and compliance.
	The new PCM has taken over the position and many required changes have begun being made. The PCM has access to the Jail Commander and is receiving good support in rebuilding the program. This is a compliant area now.

115.12	Contracting with other entities for the confinement of inmates			
	Auditor Overall Determination: Meets Standard			
	Auditor Discussion			
	According to interviews with the Commander and the PREA Compliance Manager, the Agency does not contract with anyone to confine prisoners. This standard is not applicable.			

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Since the last PREA audit, the average daily number of inmates is 1264 and the average daily number of inmates on which the staffing plan was predicated has been 1400.
	The auditor reviewed the staffing plan with the Commander and the PREA Compliance Manager and PREA Coordinator, discussing the standard criteria items that the facility takes into consideration while examining their plan. They indicated that on all occasions where the plan is not followed leadership is notified. The plan is reviewed annually by the Executive staff (including PREA Manager) with recommendations sent to PREA Coordinator who discusses the report with the Commander, then up the chain to the Chief Deputy and Sheriff.
	CPSO has a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect Inmates/Offenders against sexual abuse
	When designing new housing units, planning substantial expansions or modifications to existing housing units or when updating a video monitoring system, according to interviews with the Commander and the PREA Compliance Manager CPSO considers how such expansions, modifications or updates would enhance the ability to protect Inmates/Offenders from sexual abuse.
	When calculating adequate staffing levels and determining the need for video monitoring, according to the interview with the Commander, CPSO considers the following:
	<ol> <li>Generally accepted detention and correctional practices.</li> <li>Any judicial findings of inadequacy.</li> <li>All components of CPSO's physical plant (including "blind spots" or areas where staff or offenders may be isolated).</li> <li>The composition of the Inmate/Offender population.</li> <li>The number and placement of Supervisory Staff.</li> <li>Institution programs occurring on a particular shift.</li> <li>The prevalence of substantiated and unsubstantiated incidents of sexual abuse.</li> </ol>
	In circumstances where the staffing plan is not complied with, the Watch Commander, or Designee document and justify all deviations.
	In addition to other rounds specified in institutional policy, policy and practice require all supervisors to conduct and document unannounced rounds for the purpose of identifying and deterring Staff Sexual abuse and sexual harassment. These rounds occur during both night and day shifts. CPSO has a policy to prohibit staff members from alerting other staff members that these supervisory rounds are occurring unless such announcement is related to the legitimate operational functions of the Facility.

Auditor Discussion	115.14	Youthful inmates
		Auditor Overall Determination: Meets Standard
		Auditor Discussion
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Caddo Parish Sheriff's office is ordered to house youthful offenders by the adult court system. In the past 12 months, 11 youthful inmates received were placed in the same housing units as adults at this facility, but in separate cells. No youthful inmates were placed in isolation in order to separate them from adult inmates.

The Youthful Offender (YO) program was non-compliant in all significant ways at the time of the onsite visit. The YOs were locked down 23 hours a day according to staff interviews (23 and one-half hours per day according to the YOs interviewed) in 3-person cells. Recreation, programs and legally mandated education were largely non-existent. Some programs and schedules appear to have just disappeared in recent years, and some were reportedly impacted by COVID restrictions and program cancellations. YO's reported that adults passed by their (separate) cells and could observe them as well as talk or comment to them as they transited.

The one hour a day they had out of their cells was for all activities except meals and, according to interviews, occurs at midnight so as not to interfere with adult schedules and to prevent being out the same time that adult inmates are out. This period of time is reportedly used for showers, phone calls, and recreation. The YOs reported that large muscle exercise did not occur regularly and also report that their access to a basketball court almost never occurred despite the requirement for it to be scheduled. Staff interviews supported most of this information.

This is a repeat issue from the last audit, subsequent to which the facility reported to the auditor a new policy that defined required

programming for youthful offenders; included involvement in educational and life skills classes; and provided for spending larger amounts of the day outside their cell. Subsequent to the prior audit, the facility was providing access to the facility programs

in place and ensuring staff oversight was immediate when adults shared the same classes. All this ended and the previous YO program failures reappeared, whether due to lack of space or staff, COVID impact, or due to the small number of offenders requiring so much programmatic effort and resources. Regardless, the standard was not met at all.

This was non-compliant at the time of this audit's onsite review and considered the weakest PREA area of the audit. The facility leadership needed to assess whether there was any option to meet PREA Standards within the existing facility and, if so, develop a plan to implement them. Compliance with the intent of this standard is not something that can be easily accomplished in this facility due to lack of physical separation capability.

Additionally, a Youthful Offender program has requirements for significant time out of their cells, mandated education, programs, counseling, large muscle movement etc. that are not feasible here without major schedule and program changes. The existing program, absent significant commitment and changes to meet PREA Standards seemed likely to continue as non-certified and non-compliant in the future.

Subsequent to the Interim Report, the newly assigned PREA Compliance Manager has spent considerable time and effort to resolve these needs and done a very professional job of it. The auditor considered this CCC's weakest PREA compliance area and significant changes were required to return to management-reported provisions of 4-5 years ago.

Since the audit, Youthful Offenders are now all housed in a single Housing Unit ((Hotel Unit (Cells 1-8)). To ensure sight and sound separation outside group/dayroom areas, etc., CCC has assigned two deputies to YOs in that unit, so the youthful offenders have an extra blanket of security between them and the adult inmates. Daily log sheets and schedules were provided evidencing this assignment.

There is a new recreation schedule to ensure the inmates receive more recreation (45 minutes twice a day) and the times vary. The facility PCM attached the new schedule and a copy of daily log sheets from the Hotel housing unit. The general population and youthful inmates now receive equal amount of recreation.

Programs are now available for participation and educational tablets are issued. There is a correspondence-type program with materials that are self-guided, and the inmates have the ability to request to participate in programs through the tablets\kiosk kite system. Education is being further reviewed as the facility opens back up to visiting and outside persons being allowed in more freely.

This area is now compliant.

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	In the past 12 months, no cross-gender strip or cross-gender visual body cavity searches of inmates occurred.
	One hundred percent of all security staff have received training on conducting cross-gender pat-down searches and searches of transgender and intersex inmates in a professional and respectful manner, consistent with security needs. Female officers are authorized to pat search males.
	No search or physical exam may be conducted when the sole purpose of the search or physical exam is to determine the Inmate's/Offender's genital status.
	Offenders are allowed to shower, perform bodily functions, and change clothing without non-medical Staff of the opposite gender viewing their breasts, buttocks or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Showers are private, large enough to allow change of clothing, and have solid doors that provide privacy in most of the shower entry area. Toilets are in the cells, primarily 3 inmates to a cell, so there is little privacy from cellmates but inmates do have some privacy from persons outside the cell.
	Upon entering a Housing Unit, all cross-gender staff announce their presence.
	The CCC uses a SecurePass scanner in lieu of hands-on searches and conduct a strip search only when the scanner reveals a suspicious outcome. All strip searches or visual body cavity searches are same-gender and are documented on a security report including a risk management analysis.

Inmates with disabilities and inmates who are limited English proficient
Auditor Overall Determination: Meets Standard
Auditor Discussion
Prisoners with disabilities, and prisoners who have limited English proficiency, participate in or benefit from the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. PREA information is available in Spanish and English. Caddo has initiated a contract with Language Line to provide interpretive services for prisoners for which there are no staff to translate, allowing a policy of not using prisoners as interpreters.
The facility has taken appropriate steps to ensure that Inmates/Offenders with disabilities: (including, for example, Inmates/Offenders who are deaf or hard of hearing, (e.g. TTY in Booking), readers for those who are blind or have low vision and those who have intellectual, psychiatric, or speech disabilities, etc., all have an opportunity to participate in or benefit from all aspects of CPSO's efforts to prevent, detect and respond to sexual abuse and sexual harassment.
CPSO takes reasonable steps to ensure access to all Inmates/Offenders who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.
Inmate/Offender Interpreters may be used to explain the Policies and Procedures for reporting; however, CPSO does not rely on Inmate/Offender Interpreters, Inmate/Offender Readers or other types of Inmate/Offender Assistants except in limited circumstances where an extended delay in obtaining an effective Interpreter could compromise the Inmate's/Offender's safety, the performance of first-response duties or the investigation of the Inmate's/Offender's allegations.

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	CPSO will not hire, assign to special duty or promote any applicant or employee who:
	Has engaged in sexual abuse in a Community Confinement Facility, Jail, Lockup or Prison as defined in the definitions section of this policy.
	<ul> <li>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.</li> <li>Has been civilly or administratively adjudicated to have engaged in the above conduct.</li> </ul>
	In order to comply with PREA, applicants for hire must allow CPSO to contact previous Employers from a Community Confinement Facility, Jail, Lockup or Prison. An Authorization to Contact Previous Employers is completed by all Applicants during the interview process or prior to the effective date of hire. Prior to hiring any applicant, CPSO Personnel contact each Applicant's prior Institutional Employer for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse using the PREA Reference Check (Form S- 550.42).
	CPSO considers 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/Offenders.
	Before hiring, assigning or directly promoting any Employee who may have contact with Inmates/Offenders CPSO perform criminal background checks. Criminal background checks are performed at least once every five (5) years for current Employees and Contractors who may have contact with Inmates/Offenders.
	Each Employee has a personal responsibility for disclosing to CPSO Personnel, within 72 hours, any conduct of which they were accused, charged and/or convicted as defined in the definitions section of this policy.
	CPSO imposes upon Employees a continuing affirmative duty to disclose any such misconduct. Omissions by Applicants for hire, assignment to special duty or direct promotion regarding such conduct or providing false information about such conduct is grounds for disciplinary action up to and including dismissal.
	CPSO asks Applicants and Employees who may have contact with Inmates/Offenders directly about previous misconduct described in section S- 550.02(A) in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current Employees.
	CPSO provides information regarding substantiated allegations of sexual abuse or sexual harassment involving current or former Employees upon receiving a request from an Institutional employer for whom such Employee has applied to work. Five personnel files were randomly reviewed to validate the forms and processes used.

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The facility has had no major modifications done but an extensive examination of the physical plant determining blind spots and sight lines results in an increase of cameras, or relocation of some cameras, in the institution every year.

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	No forensic medical exams were conducted during the past 12 months. Provisions do exist for all medical treatent required to be provided free of charge. The facility has an MOU with Project Cleberation, the local Rape Crisis Agency, to provide victim services, including at forensic exams as requested by the inmate. Additionally, posters with information on calls to RAINN (Rape, Abuse & Incest National Network) for support are posted throughout the facility.
	CCC has 3 investigators who have received additional training in addition to routine law enforcement training provided to all staff when they attend the law enforcement academy. The 2 POST certified investigators are assigned to SIU full time. Again, however, the majority of the personnel assigned to CCC are POST-certified and have received training in investigations.
	All allegations of sexual assault are turned over to Sheriff's investigators for a criminal investigation. If it has been determined there is no crime or not enough evidence to support a crime the facility is notified to conduct an administrative investigation. Deputies at the facility then conduct all administrative investigations.
	Offenders who are victims of, or allege, sexual assault are offered access to forensic exams at no cost through the University Medical Center, in a unit staffed by the Louisiana DOC staff. The hospital has a SAFE/SANE nurse available at all times. Caddo has an MOU with Project Celebration to provide victim advocate services to any prisoner involved in a sexual assault. Informational posters with contact information are available throughout the facility.
	Investigators are trained to follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol is reported to be developmentally appropriate for Youth where applicable, and is adapted from the most recent edition of the US 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.
	CPSO ensures that all full and part-time Health Services Personnel and Mental Health Personnel who work regularly at CCC have been trained in:
	<ul> <li>How to detect and assess signs of sexual abuse and sexual harassment.</li> <li>How to preserve physical evidence of sexual abuse.</li> <li>How to respond effectively and professionally to victims of sexual abuse and sexual harassment.</li> <li>How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.</li> </ul>
	CPSO has documented that Health Services Staff and Mental Health Personnel have received the training referenced from either CPSO or another Agency. Health Services Staff and Mental Health Personnel also receive training mandated for Contractors and Volunteers, depending upon the Employees/Individuals status with CPSO.
	If the alleged assault has occurred within the previous 72 hours and evidence is obtainable or other circumstances dictate, arrangements are immediately made to have the alleged Victim escorted under appropriate security provisions to the hospital for assessment, or to the CCC medical unit if necessary.
	Testing for pregnancy, sexually transmitted diseases (HIV, gonorrhea, hepatitis etc.) and other diseases as determined by the Health Authority Personnel and counseling is made available to the alleged Victim when appropriate.
	All Victims of sexual abuse have access to forensic medical examinations, whether on-site or at an outside Facility, without financial cost to the Victim, when evidentiary or medically appropriate.
	Such examinations are performed by Sexual Assault Forensic Examiners (SAFE's) or Sexual Assault Nurse Examiners (SANE's) where possible.
	The Victim Advocate (Project Celebration, a local agency) is notified immediately, regardless of the time, that an alleged sexual abuse has occurred. The Victim Advocate consults with the assigned Investigator and offers assistance to the alleged Victim as is appropriate.
	As requested by the Victim, the Victim Advocate may participate in support throughout the forensic medical examination process and investigatory interviews and will provide emotional support, crisis intervention, information and referrals. The Victim Advocate may not obstruct or interfere with the course of the investigation

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The facility reports 20 allegations this past year and 20 administrative investigations, no referrals for a criminal investigation
	The Agency Policy require Administrative and Criminal Investigations be completed on all allegations of sexual abuse and sexual harassment. All allegations are investigated; all sexual-related allegations are investigated by Sheriffs law enforcement investigators.
	An administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Allegations of sexual abuse or sexual harassment are referred to SIU if the allegation does not involve potentially criminal behavior. Referrals are documented in the case file of the alleged sexual abuse or sexual harassment allegation.

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Caddo emphasizes staff training and all staff is trained as first responders. The training curriculum follows all criteria outlined in the standard. All staff interviewed were clear on their responsibilities in dealing with sexual abuse and sexual harassment. All staff have access to a laminated form which outlines responsibilities and how Deputies will respond to any sexual abuse case so that safety of the prisoner is paramount and evidence is preserved to ensure a successful prosecution. Training requirements provide training as the standard requires and is documented in staff files.
	All training on sexual abuse pursuant to the PREA Standards is developed by CPSO's Training Director in conjunction with Investigations Personnel, PREA Coordinator, PREA Compliance Manager, Health Services Director, and Mental Health Director.
	All current staff members and new hire Employees sign the Sexual Assault and Sexual Misconduct with Inmates/Offenders Acknowledgement Form (Form S-550.38) and the Malfeasance in Office Form (Form S-550.37). Both forms are maintained in the staff member's personnel file.
	All staff members who may have contact with Inmates/Offenders receive instruction related to the prevention, detection, response, reporting and investigation of sexual abuse during orientation and annual training. Orientation and annual training include:
	<ul> <li>The zero-tolerance policy for sexual abuse and sexual harassment.</li> <li>How to fulfill staff member responsibilities.</li> <li>An Offenders right to be free from sexual abuse and sexual harassment and from retaliation for reporting sexual abuse and sexual harassment.</li> <li>The dynamics of sexual abuse and sexual harassment in confinement.</li> <li>Common reactions to sexual abuse and sexual harassment.</li> <li>How to detect and respond to signs of threatened and actual sexual abuse.</li> <li>How to avoid inappropriate relationships with Inmates/Offenders.</li> </ul>
	<ul> <li>How to communicate effectively and professionally with Inmates/Offenders, including LGBTI or gender nonconforming Inmates/Offenders.</li> <li>How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.</li> </ul>
	All new Employees receive this training as part of their pre-employment orientation. CPSO provides refresher training annually to ensure Security Deputies and support staff are aware of current sexual abuse and sexual harassment policies and procedures.
	Specialized training is provided for staff members that may respond to or may be involved in investigating incidents of sexual assault and sexual misconduct in confinement settings. This training may include, but not be limited to:
	<ul> <li>Crime scene management.</li> <li>Crisis intervention.</li> <li>Techniques for interviewing sexual abuse Victims.</li> <li>Proper use of Miranda and Garrity Warnings.</li> <li>Sexual abuse evidence collection in confinement settings.</li> <li>Criteria and evidence required to substantiate a case for administrative action or prosecution referral.</li> </ul>
	CPSO maintains documentation that Investigators and medical/mental health staff have completed the required specialized training in sexual abuse duties.

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The 4 canteen contractors, who may have contact with inmates, have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response. The volunteer program is currently non-functional due to COVID. The religious services will be starting again soon. This will take time required to put every volunteer through the application process, then the PREA class, and then initiate actual schedules.
	All contractors and volunteers receive PREA training on their responsibilities under CPSO's sexual abuse and sexual harassment prevention, detection and response policies and procedures prior to assuming their responsibilities. Once they pass the training test, the PREA Coordinator then issues them their ID card that allows access to the facility. The auditor interviewed a contractor who indicated that all contractors had received the required training but had not signed any form acknowledging understanding the training or the rules in effect.
	All Volunteers, Interns and Contractors must sign the Sexual Assault and Sexual Misconduct with Inmates/Offenders Civilian Acknowledgement form (Form S-550.38) stating they understand that any violation result in disbarment from CCC and may include the filing of criminal charges as warranted. CPSO maintains documentation confirming the training the Volunteers, Interns and Contractors received.
	The level and type of training provided to Volunteers, Interns and Contractors is based on the services they provide and level of contact they have with Inmates/Offenders, but all Volunteers who have contact with Inmates/Offenders are notified of CPSO's zero tolerance policy regarding sexual abuse and sexual harassment and informed of the procedures to follow to report such incidents.

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	There were 5964 inmates admitted during past 12 months who were given required information at intake.
	The provision of initial training and information at booking, in English and Spanish, and including the information in Offender Handbooks is adequate, as is signage throughout the facility. Each cell is provided a CCC tablet which contains handbook information in English and Spanish, advanced education materials, recreational material, and outside access to such things as visiting, email, etc., if you have an account. The access to Language Line as a tool will further assist resolution or answering any foreign language, especially Latino, offender questions.
	During the booking process, Inmates/Offenders receive information explaining CPSO's zero-tolerance policy regarding sexual abuse and sexual harassment, and how to report incidents or suspicions of sexual abuse or sexual harassment. Within 30 days of booking, CPSO provides comprehensive education to Inmates/Offenders either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding CPSO's policies and procedures for responding to such incidents. CPSO also provides education in formats accessible to those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. Documentation is maintained of Inmate/Offender participation.
	In addition to providing such education, CPSO ensures that key information is readily available or visible to inmates/Offenders through posters, handbooks, or other formats.

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Caddo has 2 full time investigators at CCC and 10 CID investigators, any of whom can conduct Administrative Investigations. There are three detectives in total who are PREA trained. Training records indicated they have received specialized training, in addition to general training provided to all employees. The training included techniques for interviewing sexual abuse victims, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Interviews with these staff confirmed the additional training and subject matter.
	At any point at which actions appear possibly criminal, the investigation is transferred from SIU and performed by the Sheriff's CID investigators.
	Specialized training is provided for staff members that may respond to or may be involved in investigating incidents of sexual assault and sexual misconduct in confinement settings.

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	There are 16 medical and mental health care practitioners who work regularly at this facility who received the training required by agency policy, or 100%. Medical and Mental Health personnel receive a 3-day initial training when hired, do not attend the Corrections Academy, and attend the annual Refresher Training as do all staff.
	Specialized training is provided as required for medical and mental health staff. It was apparent during interviews that these staff seek to make sure that they have the necessary tools to ensure that all cases are handled and responded to properly.
	CPSO ensures that all Health Services Personnel and Mental Health Personnel who work regularly at CCC have been trained in:
	How to detect and assess signs of sexual abuse and sexual harassment.
	<ul> <li>How to preserve physical evidence of sexual abuse.</li> <li>How to respond effectively and professionally to victims of sexual abuse and sexual harassment.</li> <li>How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.</li> </ul>
	CPSO maintains documentation that Health Services Staff and Mental Health Personnel have received required training.

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The facility reported during the onsite audit that they were not screening all intakes at intake within 72 hours or at 30 days and were achieving only 67% at intake and 40% reassessed at the 30-day time frame. The new PCM has refreshed the policy and implemented its 100% enforcement. The new policy and forms have been provided the Auditor. Additionally, the PCM is now notified of the booking and intake of every special category of offenders.
	Wednesday weekly custody board meetings do review all new information received and reviews classification change requests and new data on incidents, etc. The PCM now attends that meeting, and it is now also used to discuss all high-risk inmates and those of special concern. Minutes of these meetings have been provided.
	Caddo's intake and classification process does a good job of screening every new arrival, and all interviews and DOC- approved forms used in Booking support this assessment. During intake, normally done immediately on arrival, the prisoner is asked about previous victimization/abuse, mental or physical disability, any prior sex offenses and whether the prisoner is or perceived to be gay, bisexual, transgender, intersex or gender nonconforming. A positive response to any of these questions reportedly initiates immediate medical and mental health review.
	Standards again now require that newly received offenders be reassessed before 30 days in the facility to determine if all initial data is still valid, that no new threats or information has arisen, and that the initial safety, housing and program decisions are still correct. Information on this process was mixed, with the classification Sergeant reporting that he reclassifies all inmates in accordance with the 30-day timeline but with several interviews with offenders who had no recollection of any follow up classification process. The PCM verifies that this is now done in every case by the Classification Deputy and the form filed in the inmate's file in Classification.
	All new in-coming Inmates/Offenders are screened during the Booking process for a history of predatory sexual behavior, sexual abuse and the likelihood/potential of sexual abuse/victimization, and upon transfer to another Facility for their risk of being sexually abused by other Inmates/Offenders or sexually abusive towards other Inmates/Offenders. The initial screening will occur within 24 hours of intake, with Booking on Day one and Classification on Day two and was followed by 14 days of quarantine for COVID.
	The screening, according to interviews with intake staff members, considers the following criteria to assess Inmates/Offenders for risk of sexual victimization: Whether the Inmate/Offender has a mental, physical, or developmental disability; age of the Inmate/Offender; physical build of the Inmate/Offender; whether the Inmate/Offender has previously been incarcerated; whether the Inmate's/Offender's criminal history is exclusively nonviolent; whether the Inmate/Offender has prior convictions for sex offenses against an adult or child; whether the Inmate/Offender is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming; whether the Inmate/Offender is detained solely for civil immigration purposes.
	Inmates/Offenders are not disciplined for refusing to answer or for not disclosing complete information in response to questions asked in the PREA Screening Checklist.
	Inmates/Offenders who enter CCC and are identified as confirmed PREA HRSV (Vulnerable) utilizing the checklist are to be considered for Protective Custody placement, but it is determined individually and is reportedly not an automatic placement.
	Classification utilizes precautions to separate potential Victims and Predators. Potential Victims who have a higher risk profile are given extra consideration regarding their housing assignment. Booking Personnel note the results of the checklist during the initial screening and will notify the Classification Department to consider which Housing Unit is assigned, including possible single cell housing for those deemed at risk of being predators or victims.
	Controls are placed on the dissemination within the Facility of information or responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the Offender's detriment.
	CPSO policy is to make individualized determinations about how to ensure the safety of each Inmate/Offender. If mental health intervention is indicated, or prior abuse is reported at intake, a referral is made to the Mental Health staff.
	In deciding where to house a Transgender or Intersex Inmate, and in making other programming assignments, CPSO policy is now to consider on a case-by-case basis what placement would best ensure the Inmate's health and safety, and whether the placement would present management or security problems. A Transgender or Intersex CPSO policy is that the inmate's own views with respect to his or her own safety are supposed to be given consideration. However, staff interviews and

own views with respect to his or her own safety are supposed to be given consideration. However, staff interviews and inmate interviews in the Protective Custody unit provided information indicating that transgender inmates are routinely

directed to the PC unit and several staff indicated they make every effort to retain them in that unit. Interviews indicate that transgender inmates in any transitioning status are automatically placed in PC, as are those undergoing any medial or hormonal treatment. This appears to be true regardless of the policy on case-by-case decisions, although these offenders are routinely considered by the Custody Board in their Wednesday meetings.

Questions regarding identification of a Transgender or Intersex Offender's genital status are referred to the Health Services Director for review and, if needed, a physical examination in private by the Health Services Staff.

At the beginning of the onsite audit, the Auditor requested names of potential 'targeted' categories of inmates from which to select potential interviews. The PREA coordinator indicated that CCC does not track inmate categories such as LGB, Transgender or Intersex, Limited English, cognitively challenged, etc. and he could not provide such lists. This made the interview process more difficult as extra effort was required to identify potential offenders for interview. Since this information is largely collected at intake and placed in an inmate record, and since medical/mental health routinely identify several of these categories, it is necessary to have this data available to the PREA Coordinator in order to identify 'at risk' offenders and assist in such protocols as classification, investigation, retaliation monitoring, 6-month required reassessment of transgenders, etc.

Since the onsite review, the PCM has established tracking systems in the electronic records system that allows management and tracking of targeted groups of offenders and has also instituted a process where she is immediately notified when a targeted offender arrives. This area has been significantly revised and is now substantially compliant. The PCM is now involved in transgender assessment to ensure individual decisions are made.

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
l	Auditor Discussion
	Caddo's intake and classification process does a good job of screening every new arrival, and all interviews and DOC- approved forms used in Booking support this assessment. During intake, normally done immediately on arrival, the prisoner is asked about previous victimization/abuse, mental or physical disability, any prior sex offenses and whether the prisoner is or perceived to be gay, bisexual, transgender, intersex or gender nonconforming. The initial screening will occur within 24 hours of intake, with Booking on Day one and Classification on Day two and was followed by 14 days of quarantine for COVID.
	A positive response to any of these questions reportedly initiates immediate medical and mental health review. Standards require that newly received offenders be reassessed before 30 days in the facility to determine if all initial data is still valid, that no new threats or information has arisen, and that the initial safety, housing and program decisions are still correct. Information on this process was mixed, with the classification Sergeant reporting that he reclassifies all inmates in accordance with the 30-day timeline but with several interviews with offenders who had no recollection of any follow up classification process, and the facility reports reclassifications of all inmates at the present time.
	The Classification Deputy completes a reassessment prior to the inmate being housed 30 days and rehouses the inmates to a general population unit according to their assessments, if indicated.
	Policy requires that Classification reassess the Inmate's/Offender's risk of victimization of abusiveness within a set time period, not to exceed 30 days from the Inmate's/Offender's arrival at CCC and is conducted using an objective screening process. This is accomplished by the Custody Board, which meets weekly, and also conducts the initial reviews, 30-day review and 'as needed' reviews of classifications, housing, movements, etc. The Custody Board is headed by the classification sergeant and includes SIU, Mental Health, and others as appropriate.
	The screening, according to interviews with members, considers the following criteria to assess Inmates/Offenders for risk of sexual victimization: Whether the Inmate/Offender has a mental, physical, or developmental disability; age of the Inmate/Offender; physical build of the Inmate/Offender; whether the Inmate/Offender has previously been incarcerated; whether the Inmate's/Offender's criminal history is exclusively nonviolent; whether the Inmate/Offender has prior convictions for sex offenses against an adult or child; whether the Inmate/Offender is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming; whether the Inmate/Offender has previously experienced sexual victimization; the inmate's own perception of vulnerability; and whether the Inmate/Offender is detained solely for civil immigration purposes.
	Booking Personnel interview and evaluate all in-coming inmates for victim or aggressor tendencies utilizing the results of the PREA Screening Checklist, available offender records and the mental health screening. The completed Checklist is filed in the Inmate's/Offender's master record and in the mental health section of the Inmate's/Offender's medical record file.
	Inmates/Offenders will not be disciplined for refusing to answer or for not disclosing complete information in response to questions asked in the PREA Screening Checklist.
	Inmates/Offenders who enter CCC and are identified as confirmed PREA HRSV (Vulnerable) utilizing the checklist are to be considered for Protective Custody placement, but it is determined individually and is reportedly not an automatic placement.
	Classification utilizes precautions to separate potential Victims and Predators. Potential Victims who have a higher risk profile are given extra consideration regarding their housing assignment. Booking Personnel note the results of the checklist during the initial screening and will notify the Classification Department to consider which Housing Unit is assigned, including possible single cell housing for those deemed at risk of being predators or victims.
	Controls are placed on the dissemination within the Facility of information or responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the Offender's detriment.

CPSO policy is to make individualized determinations about how to ensure the safety of each Inmate/Offender. If mental 36

health intervention is indicated, or prior abuse is reported at intake, a referral is made to the Mental Health staff.

The facility has not previously had the required individual review process to ensure that safety concerns regarding transgender offenders are considered before determining the best housing option for them. The current system, that places these offenders in Protective Custody, is not based on a classification or review; however, the Standards require an individual assessment be done to ensure that the best option is selected, and that Protective Custody not be the default automatic decision. The policy says that inmates are housed with those of the same birth sex, searched by those of the same birth sex, and that transgender are housed in single cells, although it appears they are primarily housed in the Protective Custody unit (PC).

In deciding where to house a Transgender or Intersex Inmate, and in making other programming assignments, CPSO policy is now to consider on a case-by-case basis what placement would best ensure the Inmate's health and safety, and whether the placement would present management or security problems. A Transgender or Intersex CPSO policy is that the inmate's own views with respect to his or her own safety are given consideration. However, staff interviews and inmate interviews in the Protective Custody unit provided information indicating that transgender inmates are routinely directed to the PC unit and several staff indicated they make every effort to retain them in that unit due to their transgender identity and especially if they are receiving hormones or have developed any female characteristics or features. Interviews indicate that transgender inmates in any transitioning status are automatically placed in PC, as are those undergoing any medial or hormonal treatment. This appears to be true regardless of the policy on case-by-case decisions, although these offenders are routinely considered by the Custody Board in their Wednesday meetings.

Questions regarding identification of a Transgender or Intersex Offender's genital status are referred to the Health Services Director for review and, if needed, a physical examination in private by the Health Services Staff.

At the beginning of the onsite audit, the Auditor requested names of potential 'targeted' categories of inmates from which to select potential interviews. The PREA coordinator indicated that CCC does not track inmate categories such as LGB, Transgender or Intersex, Limited English, cognitively challenged, etc. and he could not provide such lists. This made the interview process more difficult as extra effort was required to identify potential offenders for interview.

This area has been significantly improved.

Additionally, this information is required in order to accomplish the following Standard (115.42) and use the screening information to determine housing, cell, work and program assignments, etc.

Since this information is largely collected at intake and placed in an inmate record, and since medical/mental health routinely identify several of these categories, it is necessary to have this data available to the PREA Coordinator in order to identify 'at risk' offenders and assist in such protocols as classification, investigation, retaliation monitoring, 6-month required reassessment of transgenders, etc.

During the Corrective Action Period, processes were changed so that the PREA Compliance Manager now receives all information regarding classification, investigations, and incidents/allegations required to provide adequate oversight to management of the program. Additionally, she is notified immediately upon receipt of a vulnerable offender or potential victim. These inmates are then tracked by her to ensure they receive required assessments, reviews, etc. And are identified when involved in PREA incidents, investigations, etc.

The classification process regarding transgender offenders involves the PCM and is an actual assessment and not automated based solely on gender identity.

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The agency does have a policy prohibiting the placement of inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been made that there is no available alternative means of separation from likely abusers.
	No inmates at risk of sexual victimization were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment. There is a 24-hour review requirement and required later reviews as required by the standard.
	ars that transgender offenders were previously routinely assigned protective custody kinds of status without a significant needs assessment actually occurring, the assignment being based primarily apparently on gender identity. When asked about moving them into general population at some point, at least two staff stated they did everything they could to keep them separated into protective custody, so the local goal here appears to be the opposite of the intent of the standard.
	Protective custody is a unit where some of the high-risk inmates are housed. This unit is not considered segregated and the inmates in this unit receive all privileges that other units receive. The PCM attached protective custody log sheets as examples of schedules, recreation, etc. for them.
	Additionally, it appears that medical management cases (visual, hearing, etc.) are also highly likely to be placed in segregation for protection, as are cognitively challenged offenders. Several of these stated a desire for protective custody but there were also several offenders who had requested to return to general population, and had not been returned, and are there involuntarily for their protection. The PREA Coordinator reports that each inmate housed in this unit has access to the same things (Recreation, TV, visits, etc.) just as the inmates in a larger unit. Given that even routine general population inmates are locked down 23 hours a day,
	this does seem an inappropriate continuing separation. It is noted that several inmates expressed a desire for protective custody and did not feel safe in general population. Even though the weekly Custody Board meeting is tasked to review all inmates for potential movement and classification upgrades, there does not appear to be use of the required reviews of involuntary segregation offenders placed there for their own safety, reviews designed to return offenders to the larger population when safe to do so or to explain why it's not safe to do so.
	The transgender reassessment form is now being used and is the responsibility of the classifications staff. The PCM receives a copy of the assessment after it is completed.

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The facility provides for telephone and mail avenues to report abuse or harassment to both public and private entities that are not part of the agency, easily able to receive and forward reports of sexual abuse and sexual harassment to agency officials
	CPSO provides multiple internal methods to privately report sexual abuse and sexual harassment, retaliation by other Inmates/Offenders or staff members, for reporting sexual abuse and sexual harassment, and staff member neglect or violation of responsibilities that may have contributed to such incidents. Also, CPSO provides at least one method for Inmates/Offenders to report abuse or harassment to a public or private entity or office that is not part of CPSO, and that is able to receive and immediately forward Inmate/Offender reports of sexual abuse and sexual harassment to CPSO, while allowing the Inmate/Offender to remain anonymous upon request.
	Staff members will accept reports made verbally, in writing, anonymously, and from third parties and will promptly document any verbal reports and the facility provides a method for staff members to privately report sexual abuse and sexual harassment of Inmates/Offenders.
	Inmates can call the Sexual Assault & Crisis Center 24 hour Hotline and all allegations of sexual abuse are investigated and addressed in a confidential manner.
	Additionally, the Unit posters provide direct calling access information as noted below:
	Every offender has the right to be safe from sexual abuse and sexual harassment. If you are being pressured, threatened or extorted to have sexual contact with anyone, you can report it to staff. Tell a staff member if you are being sexually abused Or call the 24 hour Sexual Assault & Crisis Center - DIAL 6500
	Reportar el Abuso Sexual Cada delincuente tiene derecho a ser protegidos contra el abuso sexual y el acoso sexual. Si usted es amenazado con el abuso sexual, puedes reportario a los funcionarios. Dile a un miembro del personal si usted es victima de abuso O llama Asalto Sexual Centro de Crisis - 6500

Exhaustion of administrative remedies
Auditor Overall Determination: Meets Standard
Auditor Discussion
In the past 12 months, two grievances were filed that alleged sexual abuse and all of them reached final decision within 90 days after being filed. No emergency grievances alleging substantial risk of imminent sexual abuse were filed in the past 12 months.
Offenders routinely stated that GRIEVANCE remedies would be a last resort. There is a widespread conviction on the part of both offenders and staff that any complaint to any staff member would result in a fast response to solve the issue. Their frequently stated attitude was that the staff were law enforcement oriented and that their attitude was evident in their enforcement of rules and low tolerance for infractions, increasing the safety of inmates even in the absence of much support for programs and treatment. Most inmates felt this was the reason they were locked down in their cells 22 or 23 hours a day, a practice disappearing throughout the nation.
Inmates/Offenders may use the Administrative Remedy Procedure (ARP) as a means to report an alleged sexual assault or sexual misconduct. An Inmate/Offender who alleges sexual abuse may submit an ARP without submitting the ARP to a staff member who is the subject of the complaint. A final decision on the merits of any portion of a grievance alleging sexual abuse is decided upon within 90 days of the initial filing of the grievance, but computation of the 90-day time period doesn't include time consumed by Inmates/Offenders in preparing any administrative appeal.
Third parties, including fellow Inmates/Offenders, staff members, Family Members, Attorneys, and outside Advocates, are permitted to assist Inmates/Offenders in filing requests for administrative remedies relating to allegations of sexual abuse, and will also be permitted to file such requests on behalf of Inmates/Offenders.
There is no time limit imposed regarding when an Inmate/Offender may submit a grievance regarding an allegation of sexual abuse. CPSO may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse. CPSO does not require an Inmate/Offender to use any informal grievance process, or to otherwise attempt to resolve with staff members, an alleged incident of sexual abuse.
Procedures have been established for the filing of an emergency grievance alleging that an Inmate/Offender is subject to a substantial risk of imminent sexual abuse. After receiving an emergency grievance alleging a substantial risk of imminent sexual abuse, staff immediately forward the grievance to a level of review at which immediate corrective action may be taker and that level will provide initial response within 48 hours, and issue a final decision within 5 calendar days.
The initial response and final decision will document CPSO's determination whether the Inmate/Offender is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.
In every case where the alleged aggressor is a staff member, there is no contact between the alleged aggressor and the alleged Offender/Victim without the approval of the Commander or Designee.
Termination of employment by the alleged Aggressor (staff member) will not be a basis for terminating an alleged sexual assault investigation or sexual misconduct allegation.
CPSO will not enter into any agreement that limits CPSO's ability to remove alleged staff member sexual abusers from contact with any Inmates/Offenders pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted. Staff serve at the pleasure of the Sheriff in any event.
CPSO has established a method to receive third-party reports of sexual abuse and sexual harassment, and distributes public information on how to report sexual abuse and sexual harassment on behalf of an Inmate/Offender.
An Inmate/Offender can be disciplined for filing a grievance related to alleged sexual abuse only when it can be proved the Inmate/Offender filed the grievance in bad faith.

Inmate access to outside confidential support services
Auditor Overall Determination: Meets Standard
Auditor Discussion
The local agency providing these services is Project Celebration and their mailing and telephone access information is in the Offender Handbook; posters are up on all areas, and telephone numbers listed on all unit bulletin boards. The reporting number 6500 is on every poster and goes to Project Celebration for reporting and for assistance. An interview with the Director of Project Celebration services indicates few calls from Caddo and that they had provided training in prior years moreso than in recent years but still considered the relationship positive and the support from CCC leadershi to be strong. Inmates/Offenders are provided access to outside Victim Advocates for emotional support services related to sexual abuse by giving Inmates/Offenders mailing addresses and telephone numbers, including the toll-free hotline number of RAINN and Project Celebration, a LA state-wide crisis support organization, and, for persons detained solely for civil immigration purposes, consulate support addresses and information. CPSO will enable reasonable communication between Inmates/Offenders and these organizations and Agencies, in as confidential a manner as possible. Inmates/Offenders are informed prior to giving them access, of the extent to which such communications are monitored and the extent to which reports of abuse are forwarded to authorities in accordance with mandatory reporting laws. It is clear that Reporting avenues are confidential and that advocacy agency calls are recorded.

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The local agency providing these services is Project Celebration, which also provides support services, and their mailing and telephone access information is in the Offender Handbook; posters are up on all areas, and telephone numbers listed on all unit bulletin boards. Offenders may also report directly to Sheriffs law enforcement numbers.
	CPSO receives third-party reports of sexual abuse and sexual harassment and distributes public information on how to report sexual abuse and sexual harassment on behalf of an Inmate/Offender. Information is available to the inmate and is posted in the visitation areas. Visiting is restricted at the present time. There was no information located on the Website regarding reporting at the time of the onsite visit but that was added immediately following the visit.

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy requires all staff to report immediately any knowledge, suspicion, or information regarding an incident of sexual abuse or harassment; and for staff not to reveal any information related to a sexual abuse report to anyone other than extent necessary. The random interviews of staff and prisoners verified staff immediately report suspicion or information regarding an incident of sexual abuse or harassment. Random staff interviews confirmed staff responsibility of not disclosing information of allegations except in the investigation.
	Allegations of sexual abuse are reported to the PREA Coordinator immediately following the initial notification to a Supervisor. Such allegations are treated with discretion and confidentiality.
	The staff member who receives such reports; whether verbally, in writing, anonymously, and from third parties is required to immediately notify their Supervisor who will ensure an incident report is completed. All PREA related incident reports are forwarded to a Watch Sergeant who notifies SIU. PREA investigations result in formal SIU Investigations. PREA investigation case reports are forwarded to the PREA Coordinator for review, approval/disapproval and disposition.
	Staff members are required to report any claims of retaliation against Inmates/Offenders and staff members for reporting abuse, as well as any staff member neglect or violation of responsibility that may have contributed to an incident or retaliation.
	CPSO requires all staff members to report any retaliation against inmates or staff members who report such an incident; and any staff member neglect or violation of responsibilities that may have contributed to an incident or retaliation. Apart from reporting to Supervisors, staff members will not reveal 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.
	If the alleged victim is under the age of 18 or a vulnerable adult, CPSO reports the allegation to the State or local services Agency, the Office of Adult Aging or the Department of Children and Family Services.
	SIU is notified of all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports.

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	In the past 12 months, the number of times the agency or facility determined that an inmate was subject to a substantial risk of imminent sexual abuse was zero.
	Agency Policy requires staff to take immediate action to protect any offender subject to risk of victimization. The auditor questioned the Shift Supervisor, specialized staff and random staff and all knew the steps to take to protect a prisoner subject to risks of imminent sexual abuse. The staff immediately notifies the Shift Sergeant or LT, PREA Coordinator or Commander, retains the offender with them, and the offender or perpetrator is normally moved either to a different unit or, in rare cases, they can be moved even to another facility.
	CPSO policy is to take immediate action to protect an Inmate/Offender who may be subject to a substantial risk of imminent sexual abuse.

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	In the past 12 months, no allegations were received that an inmate was abused while confined at another facility and none were received from other facilitites regarding any alleged abuse at Caddo CC.
	Policy does require this notification when the facility receives an allegation that a prisoner was sexually abused while confined at another facility within 72 hours after receiving the allegation. The PREA manager is required to maintain the documentation of this notification. Interviews with the PREA Compliance manager demonstrated they knew the procedures to follow. There was one allegation made to date which was handled correctly, with both the prior facility and the offender notified as required.
	Policy S-550.14 (Reporting to Other Confinement Facilities) requires that, upon receiving an allegation that an Inmate was sexually abused while confined at another Facility, the person at CCC that received the allegation will notify in writing the Jail Commander or Designee where the alleged abuse occurred.

15.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	In the past 12 months, 20 allegations were made that an inmate was sexually abused and, in all 20 of these allegations, the first security staff member to respond to the report separated the alleged victim and abuser.
	There were no allegations where staff were notified within a time period that still allowed for the collection of physical evidence or to respond to the report to preserve and protected any crime scene until appropriate steps could be taken to collect any evidence.
	The Agency policy clearly specifies procedures for staff to respond to allegations of sexual abuse and all staff are trained as first responders. Staff interviews demonstrated that all knew the policy and practices to follow. Staff were cognizant about separating involved parties, ensuring safety and the well-being of the alleged victim, while ensuring that physical evidence is not destroyed or contaminated.
	The Agency policy clearly specifies procedures for staff to respond to allegations of sexual abuse and all staff are trained as first responders. Staff interviews demonstrated that all knew the policy and practices to follow. Staff were cognizant about separating involved parties, ensuring safety and the well-being of the alleged victim, while ensuring that physical evidence is not destroyed or contaminated.
	S-550.26 First Responder Duties
	Upon learning of an allegation of an Inmate/Offender was sexually abused, the first Security Deputy to respond to the allegation is required to:
	<ul> <li>Separate the alleged Victim and abuser.</li> <li>Preserve and protect any crime scene until appropriate steps can be taken to collect evidence.</li> <li>If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged Victim not take any actions that could destroy physical evidence, including: a. Washing. b. Brushing teeth. c. Changing clothes. d. Urinating. e. Defecating. f. Drinking or eating.</li> <li>If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure the alleged Abuser does not take any actions that could destroy physical evidence.</li> <li>Make the appropriate notifications.</li> </ul>
	If the first staff member to respond is not a Security Deputy, the staff member is required to request that the alleged Victim not take any actions that could destroy physical evidence, and then notify the Security Staff.

 Coordinated response
Auditor Overall Determination: Meets Standard
Auditor Discussion
Policy describes the institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership. Interviews with specialized staff confirmed they were knowledgeable about the PREA Plan and the coordinated duties and collaborative responsibilities. Plan in file reviewed and meets requirements.
Policy describes the institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership. Interviews with specialized staff confirmed they were knowledgeable about the PREA Plan and the coordinated duties and collaborative responsibilities. Plan in file reviewed and meets requirements.
The CSPO Coordinated Response Plan follows the below:
Responding Deputies
Notify supervisor; Intervene and separate the alleged victim from the alleged offender • Check everyone involved for injuries Notify Medical Staff or request EMS if needed • Preserve and protect the crime scene area until appropriate steps can be taken to collect any evidence Initial Actions • Ensure that the victim and the offender not take any actions that could potentially destroy evidence, to include: showering, brushing teeth, changing clothes, using bathroom, drinking or eating • Maintain security
Master Control Deputy
Provide supervision & assistance as needed; Document actions & observations Master Control Deputy • Provide security by monitoring all video surveillance cameras & activity within area • Make notifications to personnel as directed by the supervisor or other designated staff • Document all activity in the Jail Event Log as the situation evolves; Maintain timeline or events •
Supervisor
Assess the situation/ notify chain of command (Commander/Captain of Security), SIU, Medical Staff notification • Assign deputy to secure the crime scene; Ensure documentation of incident is completed • Consider temporary placement of everyone involved in segregation to ensure sight & sound separation •
Medical Health
Conduct assessment of the victim's medical condition; Provide medical assistance as required •Notify Mental Health staff to arrange counseling for the inmates involved in the incident •Provide ongoing medical services as needed & maintain documentation of medical care provided
Mental Health Staff
Conduct mental health assessment; arrange follow up counseling as needed •Ensure that the alleged victim has access to a available programs, mental health services, advocate & rape crisis hotline •
Investigator
Interview the victim, offender and witnesses; Collect, control and submit evidence • Document findings and submit criminal report; Refer for prosecution •
Commander: Ensure referrals to Medical and Mental Health staff have been made • Notify all relevant agency personnel • Monitor incident response and documentation to ensure PREA Policy compliance •
PREA Coordinator
Review response protocol and documentation; Follow up on referrals and investigation progress • Conduct incident review and document findings of inadequacy •

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	CPSO will not enter into or renew any collective bargaining agreement or other agreement that limits CPSO's ability to remove alleged staff sexual abusers from contact with inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.
	The Sheriff's staff serves at his pleasure and can be removed at will.

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Retaliation Monitoring function did not appear to be clearly assigned. The PREA Compliance Manager felt the function belonged to SIU; SIU believed it was assigned to Mental Health; but Mental Health staff denied this as being assigned to them.
	CPSO policy is reported to employ multiple protection measures, such as housing changes or transfers for Victims or Abusers, removal of alleged Abusers from contact with Victims, and emotional support services for Inmates or staff members who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.
	If any other individual cooperates with an investigation expresses a fear of retaliation, CPSO would take appropriate measures to protect that individual against retaliation. In the event an Inmate who is being monitored for retaliation is transferred, Classification will follow up with the receiving Facility to ensure continuity of retaliation monitoring.
	The obligation to monitor will terminate if CPSO determines the allegation is unfounded. Items CPSO monitors include disciplinary reports, housing or program changes, or negative performance reviews or reassignments of staff members.
	During the Corrective Action Period, the facility assigned the Retaliation Monitoring Function to the classifications department. The responsibility of checking on the offender\Staff member and completing the Protection Against Retaliation form is assigned to the Classification Sergeant. He has a file in his office to keep up with these forms and, once complete, the original goes to the PREA file. The monitoring form was provided to the Auditor.

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Caddo reports that it generally does not place offenders who allege sexual abuse for protection in involuntary restrictive housing unless there is no alternative available, but this does occur occasionally in the period immediately following an allegation. If the status must continue past short duration, the offender is supposed to be provided programs and privileges, and staff is supposed to reasons why this is not done. Interviews with Restrictive Housing line staff, line staff, and classification staff did not confirm this approach, however. Additionally, the facility has virtually eliminated attendance at programs so this may be part of the reason program assessments do not always occur.
	Inmates/Offenders placed in Segregated Housing for a PC purpose are supposed to have access to programs, privileges, education, and work opportunities to the extent possible. When access to programs, privileges, education, or work opportunities is restricted, the following has to be documented. Protective custody is a unit where some of the high-risk inmates are housed. This unit is not considered segregated. The inmates in this unit receive all privileges that other units receive. Protective custody log sheets were provided as examples of recreation, etc. schedules for them.
	<ul> <li>Opportunities that have been limited and duration of the limitation.</li> <li>Reasons for such limitations.</li> <li>CPSO policy is to assign such Inmates/Offenders to involuntary Segregated Housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment is ordinarily expected to not exceed a period of 30 days.</li> <li>It appears however, based on PC unit interviews, that numerous offenders are more or less permanently housed in PC status, including some who wish to be returned to the general population.</li> <li>CPSO reviews each Inmate/Offender placed on involuntary Segregation status every thirty (30) days to determine whether there is a continuing need for separation from General Population Inmates/Offenders.</li> </ul>
	If an involuntary segregated housing assignment is made, the following is documented:
	<ul> <li>The basis/concern for the Inmate's/Offender's safety and the reason why no alternative means of separation can be arranged.</li> </ul>
	Documentation appears lacking, although these offenders are ostensibly reviewed at the Wednesday team meetings that has oversight on making movement and status changes.
	Changes made during the Corrective Action Period have provided required reviews and explanatory decision data, access to programs similar to the general population, and avoidance of segregation spaces for PC housing.

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	One substantiated allegation of conduct that appeared to be criminal was referred for prosecution since the last PREA audit, and any such case is rapidly transferred from SIU to CID for conduct of the investigation. The facility reports that the last 12 months produced 20 allegations of sexual abuse, accompanied by 20 administrative investigations and no referrals for actions that appeared to be criminal.
	Policy states that credibility of an alleged victim, suspect, or witness is assessed on an individual basis, not determined by status as prisoner or staff. Training certificates were provided to auditor. CPSO does not impose a standard higher than a preponderance of the evidence in determining whether allegations are substantiated. Departure of the alleged abuser or victim from either employment or confinement of CPSO is not a basis for terminating an investigation.
	SIU initiates all investigations. If allegations are substantiated, or are allegations of sexual abuse, these are immediately turned over to law enforcement (CID) investigators for criminal investigations. The CID staff includes 2 PREA-trained detectives. If a crime cannot be proven, the case is referred back for administrative investigation.
	When sexual abuse is alleged, CPSO uses Investigators who have received special training in investigating incidents of sexual assault and sexual misconduct. This training includes Sexual abuse investigations; Crime scene management; Elimination of contamination; Evidence collection protocol; and Crisis intervention. CPSO policy is to promptly, thoroughly, and objectively investigate all allegations of sexual abuse and sexual harassment, including third-party reporting and anonymous reporting.
	Investigations of Sexual Assault or Sexual Misconduct Occurring Within 72 Hours: if the alleged sexual assault or sexual misconduct is reported or discovered within 72 hours of the incident, medical staff and investigators manage the forensic requirements.
	In investigations of sexual abuse occurring more than 72 Hours After the incident, alleged Victim(s) and Aggressor(s) are immediately separated and assigned to an appropriate Housing Unit. Medical and mental health screening is offered to all Victims. An investigative determination is made based upon the amount of time that has passed since the alleged incident occurred, and the possibility of evidence still existing, as to whether the alleged aggressor, if known to be an Inmate, should be placed in a dry cell to preserve forensic examinations.
	The PREA Coordinator reported he received no copies of sexual abuse or sexual harassment investigations. If true, this needs to be remedied due to the critical role the Coordinator plays in resolving and managing sexual abuse reports.
	This area has been significantly revised to ensure the Coordinator receives all documents relevant to PREA management, including related investigations, and is part of the Weekly review of all PREA-related investigations.

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Caddo policy requires that a preponderance of evidence is the standard when determining if allegations is substantiated. Interviewed investigators substantiated this as the measure used.

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estigations into allegations the offenders. The staff resolved this area quickly following the last audit, and investigators
notifications or attempted notifications are documented utilizing the Notification of Outcome of PREA Allegation form om S-550.53). CPSO's obligation to report under this PREA Standard terminates when the Inmate is released from stody.
is agreement and plan clearly were not fulfilled following issuance of the Audit results.
DRRECTIVE ACTION: In tandem with determining assignment of a Retaliation Monitor (115.67) the facility should ensure at the former process for the notification to the inmate of an investigation result process is still the preferred action or ange it as needed, but documented notice of investigation outcomes is required.
bsequent to the Interim Report, SIU investigators have been assigned to and are notifying the inmate(s) in person, npleting the Notification of Outcome form and getting it signed. The original form is kept in the PREA file (with the estigators) and the inmate is given a copy.
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115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	In the past 12 months, there were no staff from the facility who have violated agency sexual abuse or sexual harassment policies.
	In the past 12 months, no staff from the facility have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies or have been reported to licensing and credentialing boards or law enforcement or professional authorities.

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	In the past 12 months, no contractors or volunteers were reported to law enforcement for engaging in sexual abuse of inmates. Policies are fully inplace to deal with disciplinary or abuse/harassment issues.
	Policy mandates that any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and is reported to law enforcement agencies, and to relevant licensing bodies. There have been no incidents involving volunteers but interviews with a volunteer reinforced the agency policy consequences for any sexual abuse or sexual harassment.
	All Volunteers, Interns and Contractors must sign the Sexual Assault and Sexual Misconduct with Inmates/Offenders Civilian Acknowledgement form (Form S-550.38) stating they understand that any violation will result in disbarment from CCC and may include the filing of criminal charges as warranted. All Sexual Assault and Sexual Misconduct with Inmates/Offenders Civilian Acknowledgement Forms are maintained in a file under the direct responsibility of the sponsoring Department Head or Designee.
	The level and type of training provided to Volunteers, Interns and Contractors is based on the services they provide and level of contact they have with Inmates/Offenders, but all Volunteers who have contact with Inmates/Offenders are notified of CPSO's zero tolerance policy regarding sexual abuse and sexual harassment and informed of the procedures to follow to report such incidents. CPSO maintains documentation confirming the training the Volunteers, Interns and Contractors received.
	Any Volunteer, Intern and Contractor who engages in sexual abuse is prohibited from contact with Inmates/Offenders and is reported to CPSO Investigators. CPSO will take appropriate remedial measures, and will consider whether to prohibit further contact with Inmates/Offenders, in the case of any other violation of CPSO sexual abuse or sexual harassment policies by a Volunteer, Intern, and/or Contractor.

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	In the past 12 months, there were 2 administrative and no criminal findings of guilt for inmate-on-inmate sexual abuse that have occurred at the facility.
	Prisoners are subject to disciplinary actions under CPSO policy following a finding that the prisoner engaged in any sexual misconduct, including prisoner-on-prisoner sexual abuse or harassment. Sanctions are commensurate with the nature and circumstances of the abuse committed taking into account whether mental disabilities contributed. Records reviewed and interviews reflected this approach.
	CPSO considers whether to require the offending Inmates to participate in therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse as a condition of access to programming or other benefits.
	CPSO may discipline an Inmate/Offender for sexual contact with staff members only upon a finding the staff member did not consent to such contact. For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred will not constitute falsely reporting an incident or lying, even if an investigation.

Medical and mental health screenings; history of sexual abuse
Auditor Overall Determination: Meets Standard
Auditor Discussion
In the past 12 months, the facility reports that NO inmates who disclosed prior victimization during screening were offered a follow-up meeting with a medical or mental health practitioner. This may be a data error as the Auditor interviewed 2 inmates who reported they had been referred and seen by Mental Health staff; further, Mental Health staff interviewed reported that they are compliant with this.
Prior audit-reviewed policies were compliant.
Any prisoner who discloses prior sexual abuse while incarcerated or abuse at any time must be seen by a mental health practitioner within 14 days. Mental Health staff get consent per Louisiana law before reporting prior victimization which occurred outside the institutional setting. Interviews with Medical staff and Mental Health practitioners confirmed the practice as well.
S-550.06 Health Services and Mental Health Screenings/History of Sexual Abuse policy says that if the PREA screening indicates that an Inmate/Offender has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, or that an Inmate/Offender perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, CPSO ensures the Inmate/Offender is offered a follow-up meeting with Health Services or Mental Health Personnel within 14 days of the intake screening.
Mental Health Practitioners document in the Inmates/Offenders medical record that a follow-up specifically for sexual abuse issues has occurred.
Any Information related to sexual victimization or abusiveness that occurred in an institutional setting is limited to treatment staff members (and others as necessary) in order to develop Treatment plans; and Security and management decisions, including Housing; Bed/Bunk assignment; Work assignment; and Education and Program assignments.
Health Services/Mental Health Personnel obtain informed consent from inmates before reporting information regarding prior sexual victimization that did not occur in an institutional setting, unless the Inmate/Offender is under the age of 18.
Subsequent to the audit, the PCM reviewed this area for compliance and made a number of changes.
Now, if an inmate comes into booking and they are HRSV or HRSP (any indication of prior sexual victimization or abuse or abuser) the booking deputy notifies SIU investigator by phone at time of booking. If an SIU investigator is on the compound, they will meet with the inmate immediately, then forward the information to Classifications and Mental Health. Otherwise, SIU will meet with the inmate the next business day. If the inmate is claiming penetration or something that guides the investigator to start the case immediately, they will do so. SIU notifies Classifications and Mental Health. The PCM provided the form placed in each PREA case file that shows Mental health and classification being notified. Mental Health do receive calls and copies of the reports.

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Victims of sexual abuse are required to receive timely, unimpeded access to emergency medical treatment and crisis intervention services as determined by Health Services and Mental Health Practitioners professional judgment. There is no charge for related services for any alleged victim of sexual abuse. The facility medical/mental health department and the University Health Center provides this care and regardless of whether the Victim names the Abuser or cooperates with any investigation arising out of the incident.
	Inmate/Offender Victims of sexual abuse while incarcerated are offered timely information about and access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care and where medically appropriate

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy requires all prisoners be offered medical and mental health evaluations to those who were sexually abused in any prison, jail or other facility. Mental Health staff also conduct mental health evaluations on all known prisoner abusers, offering treatment. This practice was confirmed by interviews with Medical and Mental Health staff specialized interviews and case record reviews but is contradicted by facility data provided showing zero referrals.
	This area was assessed and restructured by the PCM to meet PREA Standards, see 115.81, and is now compliant.

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	In the past 12 months, there was one criminal and/or administrative investigation of alleged sexual abuse completed at the facility, excluding only "unfounded" incidents. The Auditor views this with concern since there were a reported 20 allegations made and a reported 20 investigations initiated, according to facility information provided, and completing only one appears an unlikely outcome.
	In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents, is reported as zero. This is potentially accurate as interviews indicate completed investigation outcomes are emailed to various staff rather than having an actual group meeting as required. On the other hand, the PREA Coordinator has provided records indicating that investigators provide reports on investigations to the weekly Custody Board, however the standard requires a review by senior staff and follows a checklist of specific review items that need to be used.
	Local practice at the last audit was that the review team was led by SIU and considered everything detailed in the standard. SIU conducts a sexual abuse incident review within 30 days. The review team included SIU, the Captain of Security, PREA Compliance Manager, and the PREA Coordinator with input from shift Sergeants, Investigators and Medical or Mental Health Practitioners. Any recommendations for improvement were submitted to the Jail Commander and PREA Compliance Manager (Compliance Coordinator). CPSO policy was that it would implement the recommendations for improvement or document justifications/reasons for not implementing the recommendations.
	The completed Sexual Abuse Incident Review form (Form S- 550.45) is maintained in the investigative file of the incident. Items considered are:
	<ul> <li>Whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse.</li> <li>Whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at either Facility.</li> <li>The area in each Facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse.</li> <li>Adequacy of staffing levels in that area during different shifts.</li> <li>Whether monitoring technology should be deployed or augmented to supplement supervision by Staff.</li> </ul>
	Former Caddo policy, as reflected in the prior audit, required a PREA Incident Review Board convene within thirty (30) days of the conclusion of every sexual abuse investigation, unless the allegation has been determined to be unfounded. Interviews with the PREA Coordinator and SIU investigators indicate that there is no actual Board meeting or discussion but the investigation is emailed individually to staff who would normally constitute a Board. Local practice at the last audit was that the review team was led by SIU and considered everything detailed in the standard.
	SIU conducts a sexual abuse incident review at the conclusion of every sexual abuse investigation unless the allegation has been determined to be unfounded normally within 30 days of the conclusion of the investigation. The review team includes SIU, the Captain of Security, PREA Compliance Manager, and the PREA Coordinator with input from Watch Sergeants, Investigators and Medical or Mental Health Practitioners. The review team prepares a Sexual Abuse Incident Review form (Form S-550.45) of its findings and sends a copy of the report to the Jail Commander, PREA Compliance Manager and Coordinator. Any recommendations for improvement are submitted to the Jail Commander and PREA Compliance Manager (Compliance Coordinator). CPSO policy is that it will implement the recommendations for improvement or will document justifications/reasons for not implementing the recommendations.
	The completed Sexual Abuse Incident Review form (Form S- 550.45) is maintained in the investigative file of the incident.
	Items considered are:
	<ul> <li>Whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse.</li> <li>Whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual,</li> </ul>

- Whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at either Facility.
- The area in each Facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse.

- Adequacy of staffing levels in that area during different shifts.
- Whether monitoring technology should be deployed or augmented to supplement supervision by Staff.

The Incident Review Board has been reconstituted under the new PCM and is functional again. The SIU detective is responsible for bringing the form to the meeting, leads the discussion, documents on the form as we discuss and files it the results of the Board. Membership consists of the Captain of Security), SIU, and PREA compliance coordinator, the shift Sergeant, Medical Director), Mental Health manager/counselor, Classification.

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	PREA policy requires that the facility collect accurate, uniform data for every allegation of sexual misconduct using a standardized instrument and set of definitions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice. Caddo uses the DOJ SSV4 form for data collection. This information is compiled and submitted in February of each year.
	S-550.23 Data Storage, Publication, and Destruction:
	CPSO ensures data collected is securely retained and makes all of the aggregated sexual abuse data from CPSO Facilities readily available to the public at least annually through its website. Before making aggregated sexual abuse data publicly available, CPSO removes all personal identifiers. CPSO maintains sexual abuse data collected for 10 years after the date of the initial collection.

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Caddo policy requires the PREA Compliance Manager to review data in order to evaluate and improve the effectiveness of the facility's sexual abuse prevention, detection, and response policies, practices, and training. The PREA Manager indicted he had reviewed the data to see what the facility could do to improve and that this was a part of his job function, however the Auditor was unable to view any data, leaving the perception that it was not completed. This material was added by the new PCM immediately after assuming the PCM duties
	The agency's annual assessment is conducted by the Jail Commander, according to his interview, and he reviews all relevant areas from staffing, population trends, security and video needs, etc. DPS&C has been advised in 2021 that the standard requires publication of the Audit Report directly on the website if a website exists. Provision of the data through requests, etc., is acceptable only if there is no website.
	The website was re-visited following PCM changes, based on the Interim Audit Report, to assess availability of statistics and data to the public. The current auditor visit to the website indicates that the site provides required data, access to PREA prior audit reports, and Third-Party reporting data as well as incident investigative policy.
	<ol> <li>Viewed PREA Report</li> <li>Incident Report</li> <li>Third Party reporting instructions</li> </ol>

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The facility reports that the agency makes all aggregated sexual abuse data readily available to the public at least annually through its website or other means.
	Policy requires the PREA Manager strictly control data that is collected. She is also required to maintain sexual abuse data (to include, incident reports, investigative reports, offender information, case disposition, and evaluation finding) collected for at least 10 years after the date of the initial collection unless legally required otherwise. All departments forward all PREA documentation and sexual abuse data to the PREA Compliance Manager for file, archive, and audit.
	S-550.23 Data Storage, Publication, and Destruction policy states that CPSO will ensure data collected is securely retained and make all of the aggregated sexual abuse data from CPSO Facilities readily available to the public at least annually through its website www.caddosheriff.org
	During 2021, the LA DPS&C PREA Coordinator was advised by DOJ/ PREA that the standard requires publication of the Audit Report directly on the website if a website exists. Provision of the data through requests, etc., is acceptable only if there is no website.
	The website was re-visited following PCM changes, based on the Interim Audit Report, to assess availability of statistics and data to the public. The current auditor visit to the website indicates that the site provides required data, access to PREA prior audit reports, and Third-Party reporting data as well as incident investigative policy.

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	This is considered the first year of an audit cycle since the prior aydit certification expired due to length of time without a recertification audit. The senior leadership was welcoming and open and all access was granted to conduct the audit. It is recognized that the audit was significantly impeded by the lack of preparation and provision of information prior to the onsite audit.

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
review period is for prior audits completed during the past three years preceding this audit and the fa period and allowed their certification to lapse so they are outside the 3-year period and technically co	The agency has not published on its agency website the previous Final Audit Report. However, the standard is that the review period is for prior audits completed during the past three years preceding this audit and the facility exceeded that period and allowed their certification to lapse so they are outside the 3-year period and technically compliant as this now appears as a first cycle year audit.
	The website was re-visited following PCM changes, based on the Interim Audit Report, to assess availability of information to the public. The current auditor visit to the website indicates that the site provides required data and Third-Party reporting data as well as incident investigative policy. When final, this report will be located on the website according to discussions with the PCM during the Corrective Action Period.

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

115.13 (a)	Supervision and monitoring	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes

115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher- level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes
115.14 (a)	Youthful inmates	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	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, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes

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

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

115.16 (c)	Inmates with disabilities and inmates who are limited English proficient		
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes	
115.17 (a)	Hiring and promotion decisions		
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes	
115.17 (b)	Hiring and promotion decisions		
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes	
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes	
115.17 (c)	Hiring and promotion decisions		
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes	
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes	
115.17 (d)	Hiring and promotion decisions		
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes	
115.17 (e)	Hiring and promotion decisions		
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes	

115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	Hiring and promotion decisions	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.21 (a)	Evidence protocol and forensic medical examinations	I
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	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

Evidence protocol and forensic medical examinations	
Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
Has the agency documented its efforts to provide SAFEs or SANEs?	yes
Evidence protocol and forensic medical examinations	
Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes
Has the agency documented its efforts to secure services from rape crisis centers?	yes
Evidence protocol and forensic medical examinations	
As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
Evidence protocol and forensic medical examinations	
If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
Evidence protocol and forensic medical examinations	
If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	na
Policies to ensure referrals of allegations for investigations	
Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
	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?           Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?           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)?           Has the agency documented its efforts to provide SAFEs or SANEs?           Evidence protocol and forensic medical examinations           Does the agency attempt to make available to the victim advocate from a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)           Has the agency documented its efforts to secure services from rape crisis centers?           Evidence protocol and forensic medical examinations           As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization process and investigatory interviews?           As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support, crisis intervention, information, and referrals?           Evidence protocol and forensic medical examinations           If the ag

115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	na
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes

115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	Inmate education	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	Inmate education	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	Inmate education	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes

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

Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)       yes         Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities.)       yes         Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)       yes         Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities.)       yes         Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities.)       yes         Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)       yes	
who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in itsyes	
who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its	
Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
115.35 (b)       Specialized training: Medical and mental health care	
If medical staff employed by the agency conduct forensic examinations, do such medical staff na receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	
115.35 (c)       Specialized training: Medical and mental health care	
Does the agency maintain documentation that medical and mental health practitioners have yes received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
115.35 (d) Specialized training: Medical and mental health care	
Do medical and mental health care practitioners employed by the agency also receive training yes mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	
Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	
115.41 (a)Screening for risk of victimization and abusiveness	
Are all inmates assessed during an intake screening for their risk of being sexually abused by yes other inmates or sexually abusive toward other inmates?	
Are all inmates assessed upon transfer to another facility for their risk of being sexually abused yes by other inmates or sexually abusive toward other inmates?	
115.41 (b)       Screening for risk of victimization and abusiveness	
Do intake screenings ordinarily take place within 72 hours of arrival at the facility? no	
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, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	no

115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs $(d)(1)$ , $(d)(7)$ , $(d)(8)$ , or $(d)(9)$ of this section?	yes
115.41 (i)	Screening for risk of victimization and abusiveness	I
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates?	yes
115.42 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	no
	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?	no
	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?	no
	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?	no
	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?	no
115.42 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	no
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)?	no
	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?	no

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?	no
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?	no
115.42 (f)	Use of screening information	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
115.42 (g)	Use of screening information	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent degree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent degree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent degree, legal settlement, or legal judgement.)	yes
115.43 (a)	Protective Custody	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes

Protective Custody	
Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
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
Protective Custody	L
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
Protective Custody	
In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
Inmate reporting	
Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
	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?           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?           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?           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?           If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (NA if the facility never restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (NA if the facility never restricts access to programs, privileges, education, or work opportunities.)           If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (NA if the facility never restricts access to programs, privileges, education, or work opportunites.)           If the facility restricts access to programs of separation from likely abusers can be arranged?           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?           Protective Custody           If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this sectio

	Inmate reporting	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	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	yes yes
115.52 (c)	<ul> <li>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.)</li> <li>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</li> </ul>	
	<ul> <li>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.)</li> <li>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 is exempt from this standard.)</li> </ul>	
	Exhaustion of administrative remedies         Is the agency exempt from this standard?         NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no

115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
115.52 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.).	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes

115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	yes
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	no
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes

115.61 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third- party and anonymous reports, to the facility's designated investigators?	yes
115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.63 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes

115.64 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	no
115.67 (b)	Agency protection against retaliation	·
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes

115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	na
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Following an investigation into an immate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the immate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?       yes         115.73 (b)       Reporting to immates       If the agency did not conduct the investigation into an immate'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 immate? (WA if the agency/acility is responsible for conducting administrative and criminal investigation is unfounded, or unless the immate has been released from custody, does the agency subsequently inform the resident wherever: The staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the immate has been released from custody, does the agency subsequently inform the resident wherever: The staff member is no longer posted within the immate 's unlikes the agency is a determined that the allegation is unfounded, or unless the resident indense the agency is abserted within the instate's unlikes the agency is a determined that the allegation is unfounded, or unless the resident indense the agency is abserted to substantiate subset against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident indense the agency is abserted that the allegation is unfounded, or unless the resident whenever: The staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident unless the agency is abserted that the allegation is unfounded, or unless the resident indense the agency is abserted that the allegation is unfounded on a charge related to sexual abuse against the resident indense allegation that a staff me	115.72 (a)	Evidentiary standard for administrative investigations	
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sexual abuse or sexual harassment policies?       I15.76 (b)	115.76 (a)	Disciplinary sanctions for staff	
			yes
Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse? yes	115.76 (b)	Disciplinary sanctions for staff	
		Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes

115.76 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)       Corrective action for contractors and volunteers		
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	Disciplinary sanctions for inmates	L
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	Disciplinary sanctions for inmates	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	Disciplinary sanctions for inmates	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes

Disciplinary sanctions for inmates	
For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
Disciplinary sanctions for inmates	
If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
Medical and mental health screenings; history of sexual abuse	
If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	no
Medical and mental health screenings; history of sexual abuse	
If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na
Medical and mental health screenings; history of sexual abuse	
If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
Medical and mental health screenings; history of sexual abuse	
Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
Medical and mental health screenings; history of sexual abuse	L
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
Access to emergency medical and mental health services	
Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
Access to emergency medical and mental health services	
If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
	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? Disciplinary sanctions for inmates If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (NA if the agency does not prohibit all sexual activity between inmates.) Medical and mental health screenings; history of sexual abuse If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (NA if the facility is not a prison). Medical and mental health screenings; history of sexual abuse If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (NA if the facility is not a prison.). Medical and mental health screenings; history of sexual abuse If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (NA if the facility is not a jai). Medical and mental health screenings; history of sexual abuse Is any information related to sexual victimization or abusiveness that occurred in an institutional setting or in the communi

115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na
115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	no

115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	no
115.86 (c)	Sexual abuse incident reviews	1
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	no
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?	no
	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?	no
	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?	no
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	no
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	no
	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?	no
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	no
115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	_
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes

115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.88 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	no
115.88 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	no
115.88 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	no
115.89 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	no

115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403 (f)	Audit contents and findings	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	na