

# PREA Facility Audit Report: Final

**Name of Facility:** Central Michigan Correctional Facility

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** 05/03/2024

**Date Final Report Submitted:** 08/22/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Candace L. Snyder	<b>Date of Signature:</b> 08/22/2024

AUDITOR INFORMATION	
<b>Auditor name:</b>	Snyder, Candy
<b>Email:</b>	snyder@gwtc.net
<b>Start Date of On-Site Audit:</b>	03/20/2024
<b>End Date of On-Site Audit:</b>	03/22/2024

FACILITY INFORMATION	
<b>Facility name:</b>	Central Michigan Correctional Facility
<b>Facility physical address:</b>	320 Hubbard Street, St. Louis, Michigan - 48880
<b>Facility mailing address:</b>	

Primary Contact
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<b>Name:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Gary Miniard
<b>Email Address:</b>	miniardg@michigan.gov
<b>Telephone Number:</b>	989-681-8006

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

<b>Facility Health Service Administrator On-site</b>	
<b>Name:</b>	Megan Oaks
<b>Email Address:</b>	oaksm@michigan.gov
<b>Telephone Number:</b>	989-681-6668

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	2560
<b>Current population of facility:</b>	2543
<b>Average daily population for the past 12 months:</b>	2523
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>Which population(s) does the facility hold?</b>	Males

<b>Age range of population:</b>	18+
<b>Facility security levels/inmate custody levels:</b>	Secure Level I
<b>Does the facility hold youthful inmates?</b>	No
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	436
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	181
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	46

### AGENCY INFORMATION

<b>Name of agency:</b>	Michigan Department of Corrections
<b>Governing authority or parent agency (if applicable):</b>	State of Michigan
<b>Physical Address:</b>	206 East Michigan Avenue, Lansing, Michigan - 48933
<b>Mailing Address:</b>	
<b>Telephone number:</b>	5173733966

### Agency Chief Executive Officer Information:

<b>Name:</b>	Heidi E. Washington
<b>Email Address:</b>	WashingtonM6@michigan.gov
<b>Telephone Number:</b>	517-780-5811

### Agency-Wide PREA Coordinator Information

<b>Name:</b>	CJ Carlson	<b>Email Address:</b>	CarlsonC2@michigan.gov
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## Facility AUDIT FINDINGS

### 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:

1

- 115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

#### Number of standards met:

44

#### Number of standards not met:

0

## POST-AUDIT REPORTING INFORMATION

### GENERAL AUDIT INFORMATION

#### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-03-20
2. End date of the onsite portion of the audit:	2024-03-22

#### Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	JDI, Sparrow SANE, Office of Legislative Corrections Ombudsman

### AUDITED FACILITY INFORMATION

14. Designated facility capacity:	2560
15. Average daily population for the past 12 months:	2523
16. Number of inmate/resident/detainee housing units:	16
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

<b>36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	2501
<b>38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</b>	1
<b>39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</b>	1
<b>40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</b>	1
<b>41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:</b>	1
<b>43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</b>	7

<p><b>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>2</p>
<p><b>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>22</p>
<p><b>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</b></p>	<p>No text provided.</p>
<p><b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b></p>	
<p><b>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</b></p>	<p>423</p>
<p><b>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b></p>	<p>46</p>

<b>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b>	181
<b>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</b>	No text provided.
<b>INTERVIEWS</b>	
<b>Inmate/Resident/Detainee Interviews</b>	
<b>Random Inmate/Resident/Detainee Interviews</b>	
<b>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	32
<b>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b>	<input type="checkbox"/> Age <input type="checkbox"/> Race <input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None
<b>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b>	selected inmates from all housing units
<b>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No



<b>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b>	No text provided.
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
<b>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	11
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<b>60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b>	1
<b>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b>	1
<b>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b>	1

<p><b>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Interviews of inmates and staff and review of screening documents of inmates corroborated that there were no inmates with this characteristic to be interviewed.</p>
<p><b>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>1</p>
<p><b>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>2</p>
<p><b>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>0</p>

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Interviews of inmates and staff and review of screening documents of inmates corroborated that there were no inmates with this characteristic to be interviewed.</p>
<p><b>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</b></p>	<p>2</p>
<p><b>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</b></p>	<p>3</p>
<p><b>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</b></p>	<p>0</p>

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Interviews of inmates and staff and a review of documents corroborated that there were no inmates with this characteristic to be interviewed.</p>
<p><b>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>No text provided.</p>
<p><b>Staff, Volunteer, and Contractor Interviews</b></p>	
<p><b>Random Staff Interviews</b></p>	
<p><b>71. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>22</p>
<p><b>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b></p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p><b>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<p><b>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b></p>	<p>No text provided.</p>
<p><b>Specialized Staff, Volunteers, and Contractor Interviews</b></p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p><b>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b></p>	<p>17</p>
<p><b>76. Were you able to interview the Agency Head?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>78. Were you able to interview the PREA Coordinator?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>79. Were you able to interview the PREA Compliance Manager?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

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

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

	<input type="checkbox"/> Other
<b>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of VOLUNTEERS who were interviewed:</b>	3
<b>b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
<b>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of CONTRACTORS who were interviewed:</b>	1
<b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
<b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	No text provided.

## SITE REVIEW AND DOCUMENTATION SAMPLING

### Site Review

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

<b>84. Did you have access to all areas of the facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>Was the site review an active, inquiring process that included the following:</b>	
<b>85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>88. Informal conversations with staff during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No



<p><b>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</b></p>	<p>No text provided.</p>
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**Documentation Sampling**

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

<p><b>90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</b></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
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<p><b>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</b></p>	<p>No text provided.</p>
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**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
<b>Inmate-on-inmate sexual abuse</b>	9	0	9	0
<b>Staff-on-inmate sexual abuse</b>	9	0	9	0
<b>Total</b>	18	0	18	0

**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
<b>Inmate-on-inmate sexual harassment</b>	13	0	13	0
<b>Staff-on-inmate sexual harassment</b>	19	0	19	0
<b>Total</b>	32	0	32	0

## Sexual Abuse and Sexual Harassment Investigation Outcomes

### Sexual Abuse Investigation Outcomes

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

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

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
<b>Inmate-on-inmate sexual abuse</b>	0	9	0	0	0
<b>Staff-on-inmate sexual abuse</b>	0	9	0	0	0
<b>Total</b>	0	18	0	0	0

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	0	0	9	0
<b>Staff-on-inmate sexual abuse</b>	0	1	6	2
<b>Total</b>	0	1	15	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
<b>Inmate-on-inmate sexual harassment</b>	0	0	0	0	0
<b>Staff-on-inmate sexual harassment</b>	0	0	0	0	0
<b>Total</b>	0	0	0	0	0

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	0	0	12	1
<b>Staff-on-inmate sexual harassment</b>	0	0	18	1
<b>Total</b>	0	0	30	2

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

**Sexual Abuse Investigation Files Selected for Review**

<b>98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:</b>	7
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<p><b>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p><b>Inmate-on-inmate sexual abuse investigation files</b></p>	
<p><b>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>5</p>
<p><b>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>Staff-on-inmate sexual abuse investigation files</b></p>	
<p><b>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>2</p>
<p><b>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p><b>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p><b>Sexual Harassment Investigation Files Selected for Review</b></p>	
<p><b>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>6</p>
<p><b>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p><b>Inmate-on-inmate sexual harassment investigation files</b></p>	
<p><b>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>2</p>
<p><b>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p><b>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

<b>Staff-on-inmate sexual harassment investigation files</b>	
<b>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	4
<b>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</b>	No text provided.
<b>SUPPORT STAFF INFORMATION</b>	
<b>DOJ-certified PREA Auditors Support Staff</b>	
<b>115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the TOTAL NUMBER OF DOJ-CERTIFIED PREA AUDITORS who provided assistance at any point during this audit:</b>	1

<b>Non-certified Support Staff</b>	
<p><b>116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>a. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:</b></p>	<p>1</p>
<b>AUDITING ARRANGEMENTS AND COMPENSATION</b>	
<p><b>121. Who paid you to conduct this audit?</b></p>	<p><input type="radio"/> The audited facility or its parent agency</p> <p><input type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)</p> <p><input checked="" type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm)</p> <p><input type="radio"/> Other</p>
<p><b>Identify the name of the third-party auditing entity</b></p>	<p>Corrections Consulting Services, LLC</p>



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

<b>115.11</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>The Michigan Department of Corrections MDOC Policy 03.03.140 Sexual Abuse and Sexual Harassment of Prisoners - PREA details the Department’s zero tolerance standard toward all forms of sexual abuse and sexual harassment involving prisoners and outlines the Department’s approach to preventing, detecting, and responding to such conduct. The information specific to the Central Michigan Correctional Facility (STF) is outlined in Operating Procedure STF 03.03.140 Sexual Abuse and Sexual Harassment of Prisoners - Prison Rape Elimination Act (PREA). Throughout this audit report these will be referred to as the PREA policy. In addition to the PREA Policy the MDOC PREA Manual was developed to enhance existing policy and clarify the scope and implementation requirements of PREA. In the unlikely event Department policy conflicts with this manual, the MDOC PREA Manual takes precedence.</p> <p>The Michigan DOC’s PREA processes are overseen by the PREA Section. The PREA Section includes the PREA Coordinator, Regional PREA Departmental Analysts and facility staff at each institution that are assigned duties for PREA compliance. It is important to note that due to Civil Service regulations, the MDOC uses different titles:</p>

The agency wide PREA Coordinator is titled the PREA Manager. The facility PREA Compliance Manager is titled the facility PREA Coordinator. For the ease of understanding and to avoid confusing readers who are more familiar with the PREA standard definitions of these roles, the auditor throughout this report will use the definitions as defined by the standards – the PREA Coordinator as the top level of the PREA Section who oversees the MDOC’s PREA compliance efforts, and the PREA Compliance Manger as the facility staff member who oversees the PREA compliance efforts at the STF. The PREA Coordinator and the PREA Compliance Manger have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards and have done an exceptional job in managing the STF’s PREA compliance efforts.

The auditor determined that the STF exceeds this standard. Firstly, because the DOC has a mid-level PREA Analyst that is responsible for each region’s efforts toward PREA compliance. The auditor witnessed many instances where the PREA Analysts were quick to jump in and provide documents, policy, explanations, or guidance. They are extremely knowledgeable and provide extra assistance to the facility PREA Compliance Manager. This exceeds this standard. Secondly, because the PREA Coordinator, the mid-level PREA Analysts, and the PREA Compliance Managers provide the resources and full focus on PREA and go above and beyond in every effort to comply with the standards. The team is extremely conscientious and ensures that the zero-tolerance policy is a part of the culture within the Michigan DOC. Throughout the audit, the PREA Coordinator, the PREA Analysts from all three regions, and the PREA Compliance Manager were present, and made immediate changes to even the smallest of suggestions. This team is overwhelmingly dedicated to ensuring that all aspects of PREA compliance are addressed.

<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The MDOC contracts with the Eaton County Jail for participation in the Westside Residential Alternative to Prison (WRAP) program. The auditor interviewed the State Contract Administrator for the MDOC who stated that the process for PREA compliance begins with the Request for Proposal (RFP) process. The RFP states that the contractor must comply with PREA and must include how they will comply with PREA in their proposal. Once the contractor is selected, the Contract Administrator works closely with the PREA Coordinator to ensure they include the most up-to-date PREA language required in the contract. There are four contract monitors that are supervised by the Contract Administrator. Once the contract is awarded, the contract is monitored by a contract monitors assigned to that contract for all clauses within the contract to include PREA clauses. Specific to PREA clauses, they review the PREA Audit reports, they require that if there are any incidents of sexual abuse or sexual harassment, they are reported and investigated. They conduct site reviews at the</p>

facility. The MDOC first contracted with the Eaton County Sheriff's Office from January 1, 2018, to September 30, 2022. The contract contained PREA language. The auditor reviewed the Eaton County Sheriff's Office webpage including the Corrections link. There is no current PREA Audit posted nor any PREA information on the website.

The Department of Justice (DOJ), which was responsible for promulgating the final Standards, has provided interpretive guidance in the form of Frequently Asked Questions (FAQs) to address questions of first impression when they raise issues that are broadly relevant to the application and interpretation of the Standards. These responses to FAQs are the DOJ's official position, and they reflect the fair and considered judgment of the experts across DOJ. PREA auditors are trained by DOJ to use these FAQs to guide their findings of compliance with the PREA Standards. On February 19, 2014, the DOJ provided guidance that contracted facilities needed not "be immediately and perfectly compliant with the Standards" in order for the contracting agency to be considered in full compliance. Rather, DOJ determined that it was sufficient for the contract facility to "be actively and effectively working toward achieving compliance with all the Standards" and that the contracting agency fully document the progress toward full compliance. However, on February 2, 2024, the DOJ revised its FAQ posting that as of August 20, 2022, contracting agencies shall ensure that any facility that has been contractually required to comply with PREA for at least 36 months has achieved full compliance with the PREA standards and will maintain compliance as a condition for continued use of such facility by the contracting agency.

**CORRECTIVE ACTION:** On May 7, 2024, the MDOC provided a copy of a PREA Audit completed on June 30, 2022, for the Eaton County Jail. This was a non-compliant audit as the facility did not provide all requested documentation by the conclusion of the 180-day corrective action period. The auditor required that the MDOC verify that Eaton County has acquired a certified PREA auditor to complete their audit. On July 9, 2024, the auditor received a copy of an email between the Captain of the Eaton County Jail and a certified auditor that they are in the contracting phase for an audit to be performed on December 16 to 18, 2024. The MDOC PREA Coordinator stated that they will work to ensure the Eaton County Jail becomes compliant during the audit process or the MDOC will no longer house inmates in this facility.

<b>115.13</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	The STF has developed, documented, and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing. The auditor interviewed the Warden, the Deputy Warden, a Lieutenant and the PREA Coordinator. The auditor reviewed policy, the 2023 Staffing Plan for the STF, organizational structure, verified the staffing levels through the schedule that was

	<p>provided and verified through direct observation while on site. The 2023 Staffing Plan has all the elements required by the standard. The facility requires a minimum staffing level of one Assistant Resident Unit Supervisor (ARUS) or Prison Counselor (PC) for each of the 16 housing units A to Q (there is no Unit I or Unit O). In addition, there is a Resident Unit Manager (RUM) that supervises and oversees the daily routines for Units A through H and one RUM that supervises Units J through R. Overall supervisory staff for the STF on the 0600-1800 shift includes 1 captain, 3 Lieutenants, and 10 Sergeants. Supervisory staff for the 1800-0600 shift includes 1 Captain, 3 Lieutenants, and 9 Sergeants. There are two officers assigned to each housing unit on each 12-hour shift 6AM to 6PM and from 6PM to 6AM. Additional staff are assigned to post areas based on times of day, programming, and security needs such as West Yard Sargeant, Sallyports, West and East Entrances, Rover, Chapel, Food Service, Gym, et cetera. There have been no times they have not complied with their minimum levels, just deviations from the scheduled posts where extra staffing is available. For example, when there is shortage of staff at required posts due to staffing shortages, hospital runs, or leave usage they pull staff from an extra post like from the west yard officer that will not impact security or supervision.</p> <p>They use video monitoring, electronic door monitoring, and a round tracking system to protect inmates against sexual abuse. The auditor reviewed camera placement while on the site tour and checked that doors were locked in areas where inmates were not authorized to be. The facility has well over two hundred cameras.</p> <p>The auditor reviewed the PREA Manual, Policy 04.04.100 Custody, Security and Safety Systems which governs rounds by both security staff and administrative staff. This policy also states that staff are prohibited from alerting other staff that an unannounced supervisory round is occurring. The auditor reviewed the rounds tracking log in which these rounds are documented. The auditor held informal conversations with staff and inmates to verify rounds by senior to mid-level managers from the Warden to Lieutenants are done without being alerted by other staff. The unannounced rounds include all shifts to include the night shift and weekends. The rounds reviewed included the Warden, the Deputy Warden, the ADWs, the Captains, the Lieutenants, Sergeants, and the PREA Compliance Manager.</p>
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<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	The facility does not house youthful offenders.

<b>115.15</b>	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard

	<p><b>Auditor Discussion</b></p> <p>The auditor reviewed MDOC Policy 04.04.110 Search and Arrest in Correctional Facilities, MDOC Policy 04.06.104 Gender Dysphoria, the PREA Manual, the Personal Searches training manual, and Michigan Codified Law. Michigan Codified law only allows a body cavity search with permission from the chief administrative officer of the facility by a licensed medical professional. Cross-gender searches must be documented in the Strip Search/Body Cavity Search/Cross Gender Search Form (CAJ-289). The STF does not conduct cross-gender strip searches or cross-gender visual body cavity searches except in exigent circumstances or when performed by medical practitioners. The STF trains line staff in the proper methods to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. The auditor verified this in both interviews and in review of the training files. In the event a cross-gender search is needed, the STF will document all cross-gender strip searches and cross-gender visual body cavity searches. There have been no cross-gender searches for this audit review period. The facility prohibits examination for the sole purpose of determining gender and staff are knowledgeable of correct search procedures for transgender or intersex inmates.</p> <p>The STF has policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without staff of the opposite gender viewing them in a state of undress unless in exigent circumstances or when such viewing is incidental to routine cell checks. Such policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit. There is a sign posted at the entrance to each housing unit reminding staff to conduct cross-gender announcements prior to entering the housing block. The auditor directly witnessed announcements throughout the audit and the practice was confirmed through both staff and inmate interviews. All cameras in areas with a toilet were adequately blocked digitally to ensure that inmates have privacy to toilet.</p> <p>The STF does not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, it is determined 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.</p>
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<p><b>115.16</b></p>	<p><b>Inmates with disabilities and inmates who are limited English proficient</b></p>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>The STF provides inmates with disabilities and who are limited English proficient with ways in which to fully participate in protection efforts. The PREA information that is posted and available to inmates in English are also in Spanish, as this is</p>

	<p>predominantly the other language encountered at this facility. Each facility of this agency is authorized to use a purchase order for the immediate purchase of an interpreter. This method was used to secure an interpreter for an inmate interview. This method could also be utilized for sign language interpretation services. The facility does not use inmates to interpret for other inmates and this is outlined in the PREA Manual. The MDOC has a guide for prisoners in Braille titled the Michigan Department of Corrections Identifying and Addressing Sexual Abuse and Sexual Harassment. They have instructed all staff in the use of these procedures. The interpretive services can assist in the intake process, screening process, education on how to report and if need be, translate during the investigative process. Staff work with inmates who may have trouble reading or comprehension due to a disability or cognitive impairment. They read the information and explain it to them at a level they can understand. Policy 04.06.156 Deaf and/or Hard of Hearing Prisoners dictates accommodations to ensure deaf and/or hard of hearing prisons have full and equal access to the same programs, activities, services, and accommodations available to non-deaf and/or non-hard of hearing prisoners. These procedures were confirmed during staff and inmate interviews, as well as a review of policy and other documentation.</p>
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<b>115.17 Hiring and promotion decisions</b>	
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The auditor reviewed MDOC Policy 02.06.111 Employment Screening, reviewed the Employee Handbook, the PREA Manual, and interviewed the Human Resources Manager. The facility conducts checks on the staff directly hired, contract staff, and staff transferring into the facility. Through an interview with the Human Resource director, the Michigan Law Enforcement Information Network (LEIN) criminal background checks are run by the LEIN tech in the Records Office. The facility does not conduct the criminal background checks of correctional officer staff. They are hired by the agency, and the criminal background checks are conducted by the Michigan DOC Central Office. The STF LEIN Tech conducts criminal background checks on applicants before they are promoted. The auditor reviewed a random sampling of employee files and found the necessary background checks were ran prior to employment/service. STF performs a background check at least every five years of current employees, volunteers and contractors who may have contact with inmates. LEIN background checks are run again by the LEIN Tech every year for volunteers and contract staff and every three years for custody staff. The auditor reviewed Policy Directive 02.06.11 which specifically states that every three years criminal history checks shall be processed through LEIN for all Michigan Department of Corrections employees.</p> <p>The auditor reviewed the Corrections Officer recruitment posting, application questions and promotional application questions. The STF does not hire, promote, or</p>

	<p>enlist the services of any employee, volunteer or contractor who may have contact with inmates, who has engaged in sexual abuse in any criminal justice facility, 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; or has been civilly or administratively adjudicated to have engaged in the activity described above. These as well as the interview with the Human Resource manager demonstrated the agency and facility consider these factors for hiring and promotional decisions. These questions are asked of perspective applicants during the hiring process. Failure to report or omitting information regarding the reporting of such misconduct, or the provision of false information, are grounds for discharge in accordance with the Employee Handbook.” The STF’s review process is an evaluation that does not elicit feedback or a conversation. Because it is not an interview or a written self-evaluation that elicits feedback from the employee, they are not required to ask the employees directly about such misconduct in their annual employee review as described in provision (a) of this standard. The facility does have an obligation to establish a continual affirmative duty to disclose misconduct which they do through the Employee Handbook in which employees have an ongoing obligation to disclose any sexual misconduct, failure to do so can result in discharge.</p> <p>The Human Resource manager provided a copy of a recent applicant who had previous institutional employment and the form that was completed by that employer showing that there were no substantiated allegations of sexual abuse or sexual harassment or resignation during a pending investigation of sexual abuse or sexual harassment.</p> <p>The STF provides 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. The Human Resource Manager provided a copy of a form that was completed on one of their former employees.</p>
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<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>The STF actively employs and updates technology such as video monitoring systems, door access systems, or other monitoring technology when necessary. STF considers how such technology may enhance their ability to protect inmates from sexual abuse. The facility has made modifications to the facility since the last audit. The facility was two separate prisons. Since the last audit the facility has merged the two facilities into one facility. This required removing the security fence between the two, adding a security post between the two yards and adjusting the use of some administrative buildings, and adding cameras. These changes were well thought out with efforts to enhance their ability to protect inmates from sexual abuse. The agency has approved</p>

	within their budgeting process the addition of officer worn body cameras. This equipment will be rolling out to MDOC's facilities over the next year.
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<b>115.21</b>	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The STF has 25 trained facility investigators to conduct administrative investigations. They have completed the Michigan DOC Basic Investigator Training Course in conjunction with the Crime Scene Management and Preservation Manual. The auditor reviewed the course materials for compliance with this standard.</p> <p>The Michigan State Police (MSP) is responsible for investigating criminal allegations of sexual abuse in MDOC prisons. MSP has provided documentation to the MDOC that they comply with paragraphs (a) through (e) of this standard which addresses evidence protocol, forensic medical examinations, and that while the MDOC makes a victim advocate available, the MSP will allow the victim advocate to accompany and support the victim through the forensic medical examination process and investigatory interviews.</p> <p>Victims of sexual abuse have access to forensic medical exams through the Emergency Room at Lansing Sparrow Hospital. The STF has not been able to find a local rape crisis center willing to provide services for inmates at this facility. The MDOC has trained advocates within the facility and has a Memorandum of Understanding (MOU) with Just Detention International (JDI) for the use of their crisis sexual abuse support line "An Inside Line" for victim support services. The auditor confirmed by reviewing this MOU and in phone conversation with JDI, utilizing the phone in the inmate housing area, that they will provide victim support services to the STF. When the auditor spoke to JDI they also stated they have been working with the Michigan Coalition to End Domestic and Sexual Violence to build capacity with local rape crisis centers for advocacy services to prisons in this area. In the meantime, staff advocates are trained and available as requested by the victim, to accompany and support the victim through the forensic medical examination process, investigatory interviews and provides emotional support, crisis intervention, information, and referrals.</p>

<b>115.22</b>	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	The auditor reviewed the PREA Manual, MDOC Policy 01.01.140 Internal Affairs, and



	<p>MDOC Policy 03.03.140 Sexual Abuse and Sexual Harassment of Prisoners - PREA. Each of these documents direct that all allegations will be investigated either by an administrative investigator or if criminal, by the Michigan State Police or other appropriate law enforcement agency.</p> <p>In the twelve months preceding the audit the facility investigated 48 incidents of sexual abuse and sexual harassment. 32 of these resulted in an administrative investigation only and 16 were referred on to the MSP for criminal investigation. The STF investigations were completed by qualified investigators and entered into the MDOC Administrative Investigations Management (AIM) database. The auditor reviewed the investigative documents. They were very well laid out, easy to read and contained all the necessary elements of a thorough investigative report. The administrative investigators have received specialized training. Investigative steps are properly outlined in MDOC Policy 03.03.140 Sexual Abuse and Sexual Harassment of Prisoners - PREA and MDOC Policy 01.01.140 Internal Affairs. These policies are posted on the MDOC website under policy directives at <a href="https://www.michigan.gov/corrections/public-information/statistics-and-reports/policy-directives">https://www.michigan.gov/corrections/public-information/statistics-and-reports/policy-directives</a></p>
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<b>115.31</b>	<b>Employee training</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The auditor reviewed the MDOC Training Plan, the PREA Manual, the Employee Training section of Policy 03.03.140 Sexual Abuse and Sexual Harassment of Prisoners - PREA, the PREA Training Course and quiz, and the training progress documents for employee 2023 PREA Training. They have routine reviews of written material and policy. New corrections officer attend MDOC training at the MDOC Training Division at Green Oaks. This training includes classroom instruction by a trainer using PowerPoint aids. The correctional officer basic training is followed by an on-the-job training program where veteran corrections officers train the new hire, and online computer-based training (CBT) on PREA. PREA training with staff was apparent during the interviews as staff were knowledgeable in the required competencies such as the correct first responder response - separate, provide care, protect evidence, call for assistance, notify shift supervisor, and provide a written report. Staff were knowledgeable in how to recognize signs of sexual abuse and how to communicate effectively with LGBTI inmates. The training is outlined well, and all staff have acknowledged receipt of the information. Training documentation is maintained training progress reports.</p>

<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard

	<p><b>Auditor Discussion</b></p> <p>The auditor reviewed MDOC Policy 03.02.105 Volunteer Services and Programs, the Program A Correctional Facility Administration Security Regulations training manual that is provided to all volunteers and contractors, and the PREA Manual relative to PREA training for volunteers and contractors. The facility provides PREA training to volunteers and contractors based on their contact with inmates. The auditor verified documentation of training that has been provided to volunteers and contractors. The auditor had formal interviews as well as informal conversations with volunteers and contractors who were able to state the facility's zero-tolerance policy and the appropriate actions to take if an inmate indicated sexual abuse -- report any sexual abuse and sexual harassment to a supervisor. The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates, but all volunteers and contractors who have contact with inmates are notified of the zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.</p>
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<b>115.33</b>	<b>Inmate education</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>The auditor reviewed the PREA Manual, MDOC Policy 04.01.140 Prisoner Orientation, the Prisoner Guidebook, inmate signed acknowledgment forms, and the PREA trifold brochure. The facility documents inmate education on the form CAJ-1036a Prisoner PREA information Verification 72-hour. This form has the zero-tolerance policy and the various ways to report as well as who the PREA Compliance Manager (STF uses the position title PREA Coordinator) for the facility is and who provides victim advocacy and emotional support services. The facility documents the more in-depth training on form CAJ-1036 PREA Prisoner Education Verification 30-day. This documents also has the zero-tolerance policy, their rights to be free from sexual abuse and sexual harassment, and free from retaliation for reporting, reporting methods, and acknowledgment statements that they were provided educational materials addressing sexual abuse and sexual harassment and viewed the PREA education video. Inmates new to the DOC are processed through an intake processing center at the Charles E. Egeler Reception and Guidance Center. From there they can be transferred to the STF. Processing at the Reception and Guidance Center (RGC) includes PREA Orientation, and for those who are foreign nationals, information on how to contact their foreign consulate.</p> <p>Once an inmate is transferred to the STF, they are required to do an intake process again for orientation specific to the STF. They are again provided with the PREA education via the PREA pamphlet. There are posters throughout the facility, PREA information put out by the PREA Compliance Manager on JPay emails, and information on the institutional television and brochures in the library for continuous access to</p>

	<p>PREA related information. The interviews confirmed that inmates were aware of how to report and were familiar with multiple ways to report. Many reported that if they needed to report anything they would report it to their counselor, the Assistant Resident Unit Supervisor (ARUS), the inspector, by kite, or by using the PREA hotline. While on the tour the auditor informally asked many inmates about PREA. They all stated they knew what it was, many stated they get it all the time, and that they knew how to report if they needed to and the PREA information was posted everywhere.</p> <p>PREA education for inmates with special needs is conducted through formats they can learn. The education is presented through an interpreter, through written words, through specially formatted written materials, or by a staff member that explains the information in a way that they can understand. The PREA pamphlet, PREA posters, and the Prisoner Guidebook are published in both English and Spanish. The MDOC has a bound booklet titled the "Identifying and Addressing Sexual Abuse and Sexual Harassment - A Guide for Prisoners" that is formatted in braille for inmates who are blind.</p>
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<b>115.34</b>	<b>Specialized training: Investigations</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The STF has 25 trained facility investigators to conduct administrative investigations. They have completed the Michigan DOC Basic Investigator Training Course in conjunction with the Crime Scene Management and Preservation Manual. The agency also utilizes the National Institute of Corrections investigator training courses. All criminal allegations are turned over to Michigan State Police (MSP) for investigation. The auditor reviewed the course materials, reviewed investigative files, reviewed investigator training records, and conducted interviews with investigators to demonstrate compliance with this standard.</p>

<b>115.35</b>	<b>Specialized training: Medical and mental health care</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The medical staff have completed specialized training through the MDOC computerized based training module PREA Healthcare and Mental Health Course. The medical and mental health staff must pass a quiz at the conclusion of this course with a score of 70% or better. During the interview the staff were knowledgeable about how to detect and assess signs of sexual abuse and sexual harassment, the appropriate response for transporting the inmate to the hospital for sexual assault</p>

	forensic exams, protecting evidence to aid in the prosecution of a sexual assault, how to respond with a person center, trauma informed approach, and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment.
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<b>115.41</b>	<b>Screening for risk of victimization and abusiveness</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The auditor verified compliance with this standard through a review of the PREA Manual, MDOC Policy 05.01.140 Prisoner Placement and Transfer, a review of the Risk Assessment Manual, a review of screening and re-screening documents and interviews with staff and inmates. The initial screening process is completed at the Charles E. Egeler Reception and Guidance Center (RGC). Once they are transferred to STF, the Assistant Resident Unit Supervisor (ARUS) or the Prison Counselor for their housing unit completes another assessment within 72 hours of arrival and notes the inmate’s responses in OMNI on the PREA Risk Assessment Worksheet (CAJ-1023). During the inmate interviews the typical response regarding when they were asked screening questions was one to two days after arrival at STF. When asked if they were asked these questions again, most inmates responded no. In conversations with a Prison Counselor, it was explained that during the reassessment the questions are not asked as they were the first time. They review the records, talk with the inmate about their safety and if anything has changed since they arrived.</p> <p>Once the screening is complete, only limited staff have access to the PREA screening information. The ARUS or the Prison Counselor reassesses all inmates within 30 days of arrival, when there is an incident, or upon request to ensure the inmate is safely housed based on all information. Inmates who are transgender or intersex are reassessed at a minimum of every six months. According to policy, the inmate is not ever disciplined for refusing to answer, or for not disclosing complete information in response to questions asked about mental, physical, or developmental disability; is or is perceived to be gay lesbian, bisexual, transgender, intersex, or gender nonconforming; if ever previously experience sexual victimization; or the inmate’s own perception of vulnerability.</p>

<b>115.42</b>	<b>Use of screening information</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The auditor reviewed the PREA Manual, MDOC Policy 05.01.140 Prisoner Placement and Transfer and interviewed staff. An additional certified auditor assisted in the audit by conducting inmate interviews. The STF makes individualized determinations about</p>

	<p>how to ensure the safety of each inmate. The risk assessment screening is used to keep separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive when they make housing, bed, work, education, or program assignments. In deciding whether to assign an inmate who is transgender or intersex to a housing unit for male or female inmates, and in making other housing and programming assignments, the MDOC considers on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems. An inmate who is transgender or intersex own views with respect to his or her own safety would be given serious consideration. All inmates shower in separate shower stalls at this facility. The MDOC does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated units solely based on such identification. An inmate's risk level is reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness.</p>
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<b>115.43</b>	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>The auditor reviewed MDOC Policy 04.05.120 Segregation Standards, reviewed the PREA Manual, and interviewed the Warden and staff who supervise inmates in segregated housing. The STF considers the least upsetting placement for the alleged victim. Staff interviews confirmed that inmates at high risk for sexual victimization are not placed into protective custody unless the inmate cannot be protected by any other means. According to the Segregation Standards policy, an inmate who is held in temporary involuntary segregation due to high risk for sexual victimization can only be held for up to 24 hours while a review of all available alternatives is completed. A review of status for protective custody is completed at a minimum of every 30 days. They have not placed any inmates at risk of sexual victimization in involuntary segregated housing in the past 12 months.</p>

<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>The auditor reviewed the PREA Manual, the Prisoner Guidebook, MDOC Policy 05.03.118 Prisoner Mail, the PREA pamphlet given during inmate training, noted many posters throughout the facility and had informal conversations with inmates while on the tour, and conducted formal interviews with residents. The STF provides</p>

	<p>multiple internal avenues for inmates to report sexual abuse, sexual harassment, and retaliation (i.e. telling any staff member, submitting a kite, or reporting in writing to any staff, writing to the MDOC PREA unit, and calling the MDOC Sexual Abuse Hotline (*7732 from an inmate phone). In addition, they may write for external reporting to the Legislative Corrections Ombudsman. The auditor conducted a test call using an inmate phone to the PREA Hotline using *7732. It required the auditor to leave a message. The auditor left a message to contact via text, phone, or email. The following day the PREA Analyst notified the auditor in person that the message was received.</p> <p>The MDOC has an MOU with the Legislative Corrections Ombudsman (LCO) for inmates to report sexual abuse or sexual harassment to the LCO, pursuant to the Prison Rape Elimination Act. The auditor mailed a letter while on site to the external reporting entity, the LCO. The letter was dropped in an inmate mailbox and simply said "LCO" on the exterior of the envelope. A reply was received from the LCO on March 27th that the letter had been received. The Prisoner Mail policy specifically states that mail to a licensed attorney, federal, state, or local public officials, the MDOC Director or any other Central Office staff, LCO or to a consulate or embassy may not be opened.</p> <p>All inmates when discharged from the MDOC sign and are given a copy of the PREA Discharge Reporting Information form which lists methods of reporting an incident of sexual abuse or sexual harassment that occurred while confined in the MDOC. The list includes the address and phone numbers for the MDOC Sexual Abuse Hotline, the MDOC PREA Coordinator (PREA Manager), the Legislative Corrections Ombudsman, and the MDOC Internal Affairs. The STF does not hold inmates for civil immigration purposes.</p> <p>The auditor reviewed MDOC Policy 03.03.140 Sexual Abuse and Sexual Harassment of Prisoners - PREA and the PREA Manual which states that staff may make a private report to a supervisor, via the hotline, and via the agency's website reporting form. Staff interviews confirmed that staff can pretty much report anyway they choose - to their supervisor, the PREA Coordinator, the Michigan State Police, the PREA Hotline, or the MDOC website.</p>
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<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>The MDOC does not allow the administrative remedy or grievance process to be used to report sexual abuse. This change was made because of a legal settlement in which the MDOC agreed to revise Policy 03.03.140 Sexual Abuse and Sexual Harassment of Prisoners - PREA, to remove the PREA grievance process for allegations of sexual abuse. The auditor spoke with staff and inmates about this. If an inmate mistakenly submits a sexual abuse allegation on a grievance form, the Grievance Coordinator will</p>

	<p>remove the grievance from the grievance process and forward the sexual abuse allegation to the PREA Compliance Manager (PREA Coordinator within the MDOC personnel structure). The inmate will be notified in writing that this has occurred. Inmates can submit allegations on any form/paper.</p>
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<b>115.53</b>	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor reviewed the PREA Manual, MDOC Policy 03.03.140 Sexual Abuse and Sexual Harassment of Prisoners – PREA, MDOC Policy 05.03.130 Prisoner Telephone Policy, the Prisoner Guidebook and the MOU with Just Detention International for outside confidential support services. Phone numbers and mailing addresses are provided, in English and Spanish, in the Prisoner Guidebook, in the brochure the inmates receive during intake and are posted throughout the housing areas.</p> <p>The MDOC maintains a list, titled the Universal List. The Universal List allows all prisoners to have free and unmonitored phone access to any organization on the list. This list includes the Sexual Abuse Support Line – An Inside Line which is operated by Just Detention International.</p> <p>The auditor performed a test call to JDI’s an Inside Line by dialing *HELP (4357) on an inmate phone. The auditor spoke with JDI who stated they absolutely would provide emotional support services to inmates at this facility and that that they have no concerns with the facility based on calls they have received.</p>

<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The STF website provides information on how an individual can make a third-party report to include a form that can be filled out online that goes directly to the PREA Unit. Third parties can report sexual abuse and sexual harassment to any facility staff member, by calling the MDOC Sexual Abuse Hotline, and by writing to the MDOC PREA Office. In addition, there are posters in the visit area and pamphlets available in the waiting room. The auditor conducted a test by submitting a report via the online reporting system. The PREA Unit provided verification that my report was received.</p>

<b>115.61</b>	<b>Staff and agency reporting duties</b>
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	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Manual requires all staff to immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or harassment, or retaliation toward inmates or staff for reporting any such incident, and for staff not to reveal any information related to a sexual abuse report to anyone other than the extent necessary. Staff confirmed their understanding of this policy during the interview process. Staff can report by any means (writing, verbally, or calling) any supervisor or any staff member or by any other method they choose to include the MDOC PREA Hotline, the online reporting method. Staff reporting duties include medical and mental health staff. Medical and mental health staff are required to inform inmates of their duty to report and their limits to confidentiality at the initiation of services. The auditor verified during interviews with medical and mental health staff that this is done verbally to inmates upon the first meeting. The STF does not house inmates under 18 years of age. Michigan codified law 400.11a states that those employed, licensed, registered, or certified to provide health care, educational, social welfare, mental health, or other human services are mandated reporters, and are required to orally report to Michigan Health and Human Services any abuse of a vulnerable adult.</p>

<b>115.62</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor reviewed MDOC Policy 05.01.140 Prisoner Placement and Transfer and the MDOC PREA Manual which requires staff to take immediate action to protect any inmate they learn is subject to substantial risk of imminent sexual abuse. All staff interviewed were aware of this procedure. There were two instances when an inmate was subject to a substantial risk of imminent sexual abuse. Upon interviews with the Warden, the PREA Coordinator and other staff, action typically taken is housing changes, transfers, and stop orders.</p>

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>If there is an allegation that an inmate was sexually abused while confined at another facility, the Warden notifies the head of the facility or appropriate office of the agency where the alleged abuse occurred. If such an allegation is received by them from another facility, an investigation will be initiated immediately. Both notifying other</p>



	<p>agencies and receiving notifications are documented. There have been two allegations reported regarding sexual abuse that occurred at another facility. Notification to the other facility was completed within 72 hours of receiving the allegation. There have been two allegations reported to the STF administrators from another facility. Compliance with this standard was confirmed through a review of the policy, a review of notification documentation and through interviews with both the Warden and the PREA Coordinator.</p>
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<b>115.64</b>	<b>Staff first responder duties</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The auditor reviewed the PREA policy, the PREA Manual, the training materials, and interviewed staff. Inmates who have experienced sexual abuse were interviewed and investigative materials and documents were reviewed for verification that appropriate steps were taken in response. Interviews with staff indicated they are aware of their first responder duties and could articulate how to implement proper procedures. Staff first separate the alleged victim and the alleged abuser. The alleged victim would be taken to a more private area, typically the medical office. They would encourage the alleged victim to protect any evidence by not washing, brushing teeth, changing clothes, using the restroom, drinking, or eating until the physical evidence can be collected by the SANE if the allegation occurred within a time period that still allowed for the collection of physical evidence. They would remove the alleged abuser to segregated housing and again, not allow them to not wash, brush teeth, change clothes, use the restroom, drink, or eat until the physical evidence can be collected by the SANE. The staff notify the shift supervisor, secure, and protect any physical area where there may be evidence to be collected. They contact medical staff or take them to the nearest hospital to provide immediate medical care if appropriate. Staff also carry pocket guides that outline first responder duties. There were two incidents over the past 12 months in which first responder duties were carried out to include separating the alleged victim and abuser and physical evidence was protected and collected.</p>

<b>115.65</b>	<b>Coordinated response</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The MDOC Policy 03.03.140 Sexual Abuse and Sexual Harassment of Prisoners – PREA covers the coordinated response to sexual abuse. This policy outlines everyone’s role and who does what. Training covers the coordinated response plan. Interviews with correctional officer staff, supervisors, the nurse, the investigator, the victim advocate,</p>

	the PREA Compliance Manager, and the Warden confirmed that that the procedures listed in their coordinated response plan are being adhered to.
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<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	This auditor’s review of the PREA Manual, the Employee Handbook, a review of the seven collective bargaining agreements, and interviews with the PREA Coordinator and the Warden verified that the STF has a disciplinary process that allows for staff discipline if staff are involved in any type of sexual misconduct or for violating any agency sexual abuse or sexual harassment policies. Discipline can include reassignment of a post, administrative leave during an investigation, discipline for actions or failures to act that could lead to sexual misconduct by others and dismissal or termination from employment.

<b>115.67</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	The auditor reviewed MDOC Policy 03.03.140 Sexual Abuse and Sexual Harassment of Prisoners - PREA which covers all elements of this standard. Prison Counselors are assigned the duty of monitoring for retaliation involving inmates who report. The Captains are assigned the duty of monitoring for retaliation against staff for reporting. The auditor interviewed a Prison Counselor and a Captain. They monitor for retaliation up to a 90-day period or for as long as needed. Form CAJ-1022 is used to document monitoring efforts. Currently a report document is attached to the investigative file with any notes regarding any retaliation or steps taken to ensure against retaliation. The auditor reviewed investigative files to include retaliation monitoring forms to verify compliance with this standard.

<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	The auditor reviewed the PREA Manual and MDOC Polich 04.05.120 Segregation

	<p>Standards to verify compliance with all elements of this standard. After interviewing the Warden staff assigned to supervise segregated housing, and inmates, there were no instances of using segregation to protect an inmate who had alleged to have been sexually abused. Staff stated segregated housing would only be used at the request of the inmate. There are multiple housing options available to provide adequate separation for the protection of an inmate. The standard practice would be to place the suspected abuser in segregated housing.</p>
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<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>The auditor reviewed 13 investigative files and conducted interviews with investigators, staff, and inmates. Allegations that are criminal are referred to the Michigan State Police. The incidents were properly investigated as outlined by their policy and PREA standards. All investigators have received specialized training to conduct sexual abuse investigations. Administrative investigations include efforts to determine whether staff actions/failures contributed to the abuse. The investigations are documented through written reports and include physical/testimonial evidence, credibility reasoning assessments and investigative facts and findings. All written reports will be retained for at least seven (7) years from inmate(s) discharge. Investigations will not be terminated due to the departure of an alleged abuser or victim. The facility will cooperate with outside investigators and will remain informed of the investigation progress.</p>

<b>115.72</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>The auditor interviewed investigators, the PREA Coordinator, the PREA Compliance Manager, and the Warden. The auditor reviewed the investigative policy, 13 investigative files, and the specialized training documentation for investigators. Staff involved with the investigative process were able to explain the evidentiary standard of a preponderance of evidence. The investigator explained preponderance of the evidence during the interview and that this means that to substantiate a case they must prove that there is a greater than 50%, based on all the reasonable evidence, that the alleged perpetrator committed the sexual assault or sexual harassment that was reported. All investigators have received specialized training to conduct sexual abuse investigations. Administrative investigations include efforts to determine whether staff actions/failures contributed to the abuse.</p>

The investigators properly document interviews, camera coverage and other physical evidence to prove the case. However, the auditor feels that for some reason the investigative outcome in some cases does not reflect the evidence that the investigator documented in the investigative file. The auditor was unable to determine why this occurred. It could be that by changing their terminology as to the outcome of the of the investigation either the finding at the conclusion of the cases is mislabeled or the investigator is leery to state that the case is Unfounded for some reason.

The agency uses the final determinations as follows:

<b>PREA</b>	<b>MDOC</b>	<b>Meaning</b>
Unsubstantiated	Insufficient Evidence	Insufficient evidence to determine whether or not allegation occurred.
Unfounded	No Evidence	Sufficient evidence present to determine the allegation did not occur.
Substantiated	Sufficient Evidence	Sufficient evidence present to determine the allegation did occur.

All 13 cases the auditor reviewed were unsubstantiated. In the auditor's opinion, the evidence in several cases indicated the case should be ruled Unfounded and in one case the investigator stated during the interview with the auditor that the case was Unfounded, yet the case documentation stated there was Insufficient Evidence to determine whether or not the allegation occurred. When speaking with administrative staff and members of the PREA Section, they stated that in the examples the auditor gave, the evidence indicated that the allegation did not occur. The initial random sample was selected by the auditor using only the type of case and the case number selected randomly from a list of AIM numbers. However, in all cases the auditor selected and reviewed, they were concluded as Insufficient Evidence. Due to the high number of Unsubstantiated cases, the auditor immediately suspected that the possibility existed that they were not using the Preponderance of Evidence correctly even though everyone interviewed was able to accurately state what Preponderance of the Evidence means and how it is used. The Preponderance of Evidence is the lowest evidentiary standard of proof. It was selected in PREA investigations so that the facility would take actions under their immediate control such as separating the person from contact with the abuser or harasser, giving meaningful consequences such as taking privileges away from people who are perpetrating sexual harassment, providing additional training, and in the evidence of criminal actions, turning the case over to criminal investigators to seek criminal prosecution.

When an investigative conclusion is not presented correctly it runs the risk of ruining the PREA processes by not holding inmates or staff accountable for sexual misconduct, manipulating the process for housing changes or as a tool for retribution against staff, and affecting the morale of staff when the evidence shows that the allegation was false, but the outcome stated that the they could not tell one way or the other and the inmate has no consequences for making the false allegation.

The auditor and the PREA Section had good discussions on the above issues and how a mistaken investigative conclusion can sabotage the PREA process within the prison. The PREA Coordinator and the Warden stated that their budget has been approved for officer worn body cameras which should provide excellent proof against some of the allegations where the truth is hard to determine due to the conflicting accounts of one individual's word against another's, with no other witnesses present, nor other type of credible proof either for or against the allegation. In addition, the budget has been approved to hire an Investigations Section that is specially trained, and duties are devoted solely to the administrative investigative process. As the current administrative investigators also have additional duties, there are many trained investigators in positions from Sergeant to Captain so that no single investigator gets too heavily burdened which may affect their other assigned duties. While this is good for not overburdening the staff, the investigators do not get enough experience to become truly proficient and the process is not standardized among all the investigators. Once the Investigative Section is in place, the MDOC will have a more highly skilled investigative team that focuses solely on investigations and their investigative process should be more standardized between the investigators.

The auditor believes that by using terms for the conclusion of the investigation that are different than those used within the PREA standards, it runs the risk of investigators and other readers of the investigative report confusing the meaning of the outcome. Currently, the investigations are completed within the Internal Affairs (IA) database. This database was created for all types of investigations within the prison, not just sexual misconduct investigations. The terms that are used within the IA database deviate from the terms used by the PREA Standards. They use the PREA investigative outcome terms when they report the outcome to the inmate as required by standard 115.73, but in many other areas of the investigative process, the IA terms are used. Once the MDOC Investigation Section is in place, they anticipate having a database exclusive to PREA that will use the terms Substantiated, Unsubstantiated, and Unfounded only, within all parts of the investigative process.

**CORRECTIVE ACTION:** The auditor required that the MDOC retrain all investigators to ensure there is no doubt they are all correctly using the terms [Insufficient evidence means Unsubstantiated; No Evidence means Unfounded; and Sufficient Evidence means Substantiated] and are correctly applying the standard of evidence that is used for PREA allegations - the preponderance of evidence. The Auditor recommends they change their investigative findings to match the terms of the PREA Standards for all PREA investigations. The auditor will monitor all investigations during the corrective action period to ensure investigative outcomes are properly recorded. The auditor will monitor during the corrective action period to determine if officer-worn body cameras and the Investigation Section improve the investigative process. On July 12, 2024, the PREA team held a virtual meeting with the auditor to discuss the curriculum for the training needed for administrative investigators. On July 29, 2024, the PREA Analyst provided the auditor with a curriculum that included in depth discussion on Standards 115.71 and 115.72, the Internal Affairs Policy Directive 01.01.140, PREA Policy Directive 03.03.140, the PREA Manual, the BIT Trainer Manual, Standards In Focus 115.71, an in depth discussion on the evidentiary standard "Preponderance of the Evidence" and how and why it is used,

	<p>the explanation from the auditor’s audit report on issues with the MDOC investigative process under standard 115.72, the definitions of Unfounded, Unsubstantiated and Substantiated and the MDOC equivalent used in the Internal Affairs database. On July 31, 2024, the auditor received notice from the PREA analyst that the body cam unit was operational and the PREA investigative unit held interviews and was in the process of hiring the head administrator for the unit. The auditor feels that with both better video evidence from the body cams, and an investigative unit devoted strictly to PREA investigations, the PREA investigative process will improve substantially. On August 15, 2024, the auditor received the training roster that investigators had received additional training in the course "Evidentiary Standard for Administrative Investigations". The auditor reviewed investigations provided by MDOC during the corrective action period to ensure investigative outcomes are properly recorded.</p>
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<b>115.73</b>	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>The MDOC PREA Manual and MDOC Policy 03.04.140 Sexual Abuse and Sexual Harassment of Prisoners - PREA requires inmates to be informed as to whether the allegation was substantiated, unsubstantiated or unfounded, whether the allegation involved staff, contractors, volunteers, or another inmate. If a sexual misconduct allegation is confirmed, the inmate will be informed of the abuser’s employment/ volunteer/contractor status; and as appropriate of an indictment/conviction. Interviews with the PREA Compliance Manager confirmed practices involving all standard components were in place. The auditor reviewed investigative files and found documented evidence that the inmate is made aware of the outcome on form CAJ-1021 Prisoner Notification of Sexual Abuse and Sexual Harassment investigative Findings and Action. The auditor recommends that the facility use the exact language required by the standard. The term Not Substantiated should be changed to Unsubstantiated. On the CAJ-1021 form PREA Prisoner Notification of Sexual Abuse and Sexual Harassment Investigative Findings and Action, the MDOC uses the following findings.”</p> <p>PREA-related finding: Not Substantiated</p> <p>PREA-related finding: Substantiated</p> <p>PREA-related finding: Unfounded</p>

<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard

	<p><b>Auditor Discussion</b></p> <p>The auditor reviewed the MDOC PREA Manual, the Employee Manual, MDOC Policy 03.04.140 Sexual Abuse and Sexual Harassment of Prisoners – PREA which requires that staff members who have violated sexual abuse, sexual harassment or retaliation policies are subject to disciplinary sanctions. In reviewing investigative files and conducting interviews with the PREA Coordinator and the Warden it was confirmed that agency policy is followed, and appropriate disciplinary measures are used commensurate with the violation. When criminal acts are suspected, it is reported to law enforcement.</p>
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<b>115.77</b>	<b>Corrective action for contractors and volunteers</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The auditor reviewed investigative files, the MDOC PREA Manual, MDOC Policy 03.04.140 Sexual Abuse and Sexual Harassment of Prisoners – PREA, and a memo regarding investigations of contractual employees from the manager of the Internal Affairs Section. Policy states that contractors and volunteers are subject to disciplinary actions including termination for violation of sexual abuse policy. There is nothing that prevents the administration from taking corrective action against contract workers. There was one allegation that included both sexual harassment and sexual abuse by a contractor during this audit reporting period. The contractor was put on an immediate Stop Order from entering this or any MDOC facility and access was permanently terminated at the conclusion of the investigation. The investigation determined the allegation for sexual harassment was substantiated and the allegation for sexual abuse was unsubstantiated. The sexual abuse allegation was referred to the MSP and they stated the prosecutor would not see charges to pursue prosecution.</p>

<b>115.78</b>	<b>Disciplinary sanctions for inmates</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The auditor reviewed investigative files, the MDOC PREA Manual, MDOC Policy 03.04.140 Sexual Abuse and Sexual Harassment of Prisoners – PREA, and MDOC Policy 03.03.105 Prisoner Discipline. The auditor determined the STF follows policy and complies with this standard as indicated by a review of the review of the policy, a review of investigative files and interviews with staff and inmates. For incidents of inmate-on-inmate sexual abuse, sexual harassment or retaliation, administrative sanctions will be handed out following the formal disciplinary processes and applied</p>

	<p>commensurate with the level of infraction. The MDOC prohibits all sexual activity among offenders and does not deem such activity to be sexual abuse if the activity is consensual. However, consensual activity is thoroughly investigated to ensure that it is truly consensual and not coerced. There were no administrative findings or criminal findings for inmate-on-inmate sexual abuse that occurred at the facility.</p>
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<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>The auditor determined compliance with this standard by a review of the PREA Manual, the Mental Health Services Guidebook for inmates, a review of the screenings and interviews with the Health Unit Manager and the Unit Chief for the Mental Health Services. The PREA screening is completed by an ARUS or Prison Counselors. If the inmate has a history of sexual abuse senior Medical and Mental Health Staff receive an email upon the completion of the screening that informs them if the inmate wants to meet with them or not. Any inmate that has experienced prior sexual victimization or has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, will be offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening. Interviews confirmed agency policy expectations and staff were aware of their responsibilities including limiting information strictly to medical and other staff, as necessary. Many facility staff reference sending a mental health referral titled ROBERTA-R. This is a request for a mental health evaluation by mental health staff. The acronym stands for Reasoning, Orientation, Behavior, Emotion Recall/Memory, Talk, Appearance, Relationships. Areas that the mental health professional assesses. The staff use a form CAJ-1028 PREA Authorization for Release of Information if the inmate alleges to be a victim of sexual abuse in the community and has requires that the allegation be referred to law enforcement. There are Informed Consent Posters that state their Limitations to Confidentiality in that they must immediately report and knowledge suspicion, or information regarding an incident of sexual abuse, sexual harassment, retaliation, or staff neglect that occurred in the facility and state they must complete an Informed Consent form to release information about prior sexual victimization. The auditor toured the physical spaces which are secured by electronic key cards and information electronically stored is password protected. Medical and Mental Health staff are aware of mandatory reporting laws for inmates.</p>

<b>115.82</b>	<b>Access to emergency medical and mental health services</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>



	<p>The auditor reviewed MDOC Policy 03.04.100 Health Services, MDOC Policy 03.04.125 Medical Emergencies, MDOC Policy 04.06.180 Mental Health Services, the PREA Manual, documentation and interviewed the Health Unit Manager and the Mental Health Unit Chief. PREA requirements are met for access to emergency medical and mental health services. In the event services after hours are not available by the facility medical staff or mental health staff, inmates are taken to Lansing Sparrow Hospital. Both the medical and mental health administrators stated that facility administrators and custody staff defer to their judgment and custody staff have never delayed in transporting when they deem it is necessary. The Health Unit Manager stated they are offered immediate information about access to sexually transmitted infection prophylaxis and if not by them, it will be by the SANE if they are transported to the hospital for a forensic examination. These services are provided without financial cost and regardless of whether they name the abuser or cooperate with the investigative process.</p>
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<p><b>115.83</b></p>	<p><b>Ongoing medical and mental health care for sexual abuse victims and abusers</b></p>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>The MDOC Policy 03.04.100 Health Services requires that medical and mental health evaluations and treatment are offered at no cost to sexual abuse victims and abusers. The Health Care and Mental Health Administrator verified this as a consistent practice. Tests for sexually transmitted infections are offered. Mental Health staff follow up with the inmate to determine if services are needed. Continued care would include any follow-up services requested by the SANE, evaluation for the Michigan Sexual Abuse Prevention Program (MSAP) within 60 days, treatment plans, counseling, admission to a correctional mental health program, group therapy or referral to a psychiatric provider, and when necessary referrals for continued care following transfer to other facilities or a release from custody.</p>

<p><b>115.86</b></p>	<p><b>Sexual abuse incident reviews</b></p>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>The auditor reviewed the PREA Manual, the Operating Procedure STF 03.03.140 Sexual Abuse and Sexual Harassment of Prisoners - Prison Rape Elimination Act (PREA), the CAJ-1025 Sexual Abuse Incident review form completed after the investigative process, MDOC Policy 03.03.140 Sexual Abuse and Sexual Harassment of Prisoners - PREA. The STF conducts formal sexual abuse incident reviews within 30 days following each sexual abuse investigation specifically answering the questions</p>

	<p>posed within the standard. The review includes upper-level staff, supervisors, investigators, and medical and mental health staff. Compliance with this standard was met as supported through interviews and review of the investigative files which included sexual abuse incident reviews.</p>
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115.87	Data collection
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>The facility collects uniform data for all allegations of sexual abuse based on incident reports and files. Aggregate annual data is available and was provided to the auditor. The auditor interviewed the PREA Coordinator, the PREA Compliance Manager, reviewed the PREA Manual and the aggregate data posted on their website at <a href="https://www.michigan.gov/corrections/-/media/Project/Websites/corrections/Annual-Statistics/Annual-Report---2022.pdf?rev=ad0bbbb74ed746b6bd41272fb0ecfe11&amp;hash=18316849F277BA200B2">https://www.michigan.gov/corrections/-/media/Project/Websites/corrections/Annual-Statistics/Annual-Report---2022.pdf?rev=ad0bbbb74ed746b6bd41272fb0ecfe11&amp;hash=18316849F277BA200B2</a></p> <p>The aggregate data posted on their website is analyzed for the MDOC by type of incident. The auditor recommends that aggregate data for each individual MDOC facility is posted as well. The STF performed a Survey of Sexual Victimization (SSV) when requested to provide data to the Department of Justice. The auditor reviewed the SSV for 2017 through 2020. The MDOC contracts with the Eaton County Jail for the Westside Residential Alternative to Prison (WRAP) program. The MDOC was not able to provide incident-based and aggregated data from the Eaton County Jail with which it contracts for the confinement of inmates.</p> <p><b>CORRECTIVE ACTION:</b> The auditor required that the Eaton County Jail incident-based and aggregate data be provided to the auditor. On July 30, 2024, the PREA team provided the auditor with the 2023 Annual Report dated 07-12-24 which included aggregated data by facility to include their contracted facility, the Eaton County Jail.</p>

115.88	Data review for corrective action
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>The auditor interviewed the Warden, the PREA Coordinator, the PREA Compliance Manager and reviewed the PREA Manual and the annual reports posted online. The MDOC review and annual report are aimed at assessing and improving the effectiveness of the MDOC's sexual abuse prevention, detection, and response policies, practices, and training, including identifying problem areas, taking corrective action on an ongoing basis. Annual reports with aggregate data are completed by July 1 following the previous calendar year. Their annual reports for 2014 to 2022 are posted on their website at <a href="https://www.michigan.gov/corrections/public-information/statistics-and-reports/prea">https://www.michigan.gov/corrections/public-information/statistics-and-reports/prea</a>.</p>

<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor interviewed the Warden, the PREA Coordinator, and the PREA Compliance Manager. The auditor reviewed the PREA Manual, and the aggregate data posted on the website. The PREA policy addresses data storage, publication, and destruction requirements. Information is maintained locked within the Administrative Offices or on a password protected drive with limited access. Data collected is retained via limited access and it is retained for at least ten (10) years. The STF does not contract for the confinement of their inmates with other facilities. The MDOC contracts with the Eaton County Jail for participation in the Westside Residential Alternative to Prison (WRAP) program. The Eaton County Jail, with which the MDOC contracts for the confinement of its inmates, aggregate data is not provided on the MDOC website.</p> <p><b>CORRECTIVE ACTION:</b> The auditor required that either the Eaton County Jail aggregate data or a link to the Eaton County Jail aggregate data be posted on the MDOC website. On July 30, 2024, the PREA team provided the auditor with the 2023 Annual Report dated 07-12-24 which included aggregated data by facility to include their contracted facility, the Eaton County Jail.</p>

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The STF's last audit was conducted on April 1-3, 2019. This audit was conducted on March 20-22, 2024. The facility had a state mandated COVID response which prohibited most audits during the third audit cycle. The auditor had complete access and observed operations in every area of the facility. The auditor requested many documents throughout the audit process. The STF staff were very cooperative throughout the audit process. The facility provided private accommodation to conduct interviews. The auditor notices were posted throughout the facility and the auditor received an electronic message on February 7, 2024. The auditor received prisoner correspondence and inmates were interviewed while on site. It was readily apparent that all levels of staff are committed to professionalism and sexual safety within their institutions.</p>

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard

	<p><b>Auditor Discussion</b></p> <p>This is the third audit for this facility. The first audit was conducted on June 16-18, 2015. The second audit was conducted on April 3-5, 2019. Both audits are published on their website at <a href="https://www.michigan.gov/corrections/public-information/statistics-and-reports/prea">https://www.michigan.gov/corrections/public-information/statistics-and-reports/prea</a></p>
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<b>Appendix: Provision Findings</b>		
<b>115.11 (a)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
<b>115.11 (b)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
<b>115.11 (c)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	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
<b>115.12 (a)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	yes
<b>115.12 (b)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure	yes

	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.)	
<b>115.13 (a)</b>	<b>Supervision and monitoring</b>	
	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	yes

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

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



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

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

	with inmates with disabilities including inmates who: Have intellectual disabilities?	
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
<b>115.16 (b)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
<b>115.16 (c)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
<b>115.17 (a)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who	yes

	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?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
<b>115.17 (b)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
<b>115.17 (c)</b>	<b>Hiring and promotion decisions</b>	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
<b>115.17 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes

<b>115.17 (e)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
<b>115.17 (f)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
<b>115.17 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	

	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
<b>115.21 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
<b>115.21 (b)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
<b>115.21 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes

	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
<b>115.21 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
<b>115.21 (e)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
<b>115.21 (f)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
<b>115.21 (h)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	yes
<b>115.22 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	

	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
<b>115.22 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
<b>115.22 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
<b>115.31 (a)</b>	<b>Employee training</b>	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes



	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
<b>115.31 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
<b>115.31 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
<b>115.31 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.32 (a)</b>	<b>Volunteer and contractor training</b>	

	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
<b>115.32 (b)</b>	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
<b>115.32 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
<b>115.33 (a)</b>	<b>Inmate education</b>	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
<b>115.33 (b)</b>	<b>Inmate education</b>	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
<b>115.33 (c)</b>	<b>Inmate education</b>	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes

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

	Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.34 (c)</b>	<b>Specialized training: Investigations</b>	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.35 (a)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or	yes

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

	screening instrument?	
<b>115.41 (d)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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)	yes

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

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



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

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

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

	anonymous upon request?	
	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.)	na
<b>115.51 (c)</b>	<b>Inmate reporting</b>	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.51 (d)</b>	<b>Inmate reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
<b>115.52 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
<b>115.52 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	na
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	na
<b>115.52 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	na

	this standard.)	
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	na
<b>115.52 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	na
	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.)	na
	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.)	na
<b>115.52 (e)</b>	<b>Exhaustion of administrative remedies</b>	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	na
	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.)	na
	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.)	na
<b>115.52 (f)</b>	<b>Exhaustion of administrative remedies</b>	

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na
<b>115.52 (g)</b>	<b>Exhaustion of administrative remedies</b>	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	na
<b>115.53 (a)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	na

	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.)	
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
<b>115.53 (b)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
<b>115.53 (c)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
<b>115.54 (a)</b>	<b>Third-party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
<b>115.61 (a)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual	yes

	abuse or sexual harassment or retaliation?	
<b>115.61 (b)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
<b>115.61 (c)</b>	<b>Staff and agency reporting duties</b>	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
<b>115.61 (d)</b>	<b>Staff and agency reporting duties</b>	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
<b>115.62 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
<b>115.63 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes



<b>115.63 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.63 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
<b>115.64 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
<b>115.64 (b)</b>	<b>Staff first responder duties</b>	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
<b>115.65 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in	yes

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

	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?	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
<b>115.67 (d)</b>	<b>Agency protection against retaliation</b>	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
<b>115.67 (e)</b>	<b>Agency protection against retaliation</b>	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
<b>115.68 (a)</b>	<b>Post-allegation protective custody</b>	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
<b>115.71 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	When the agency conducts its own investigations into allegations	yes

	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).)	
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
<b>115.71 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
<b>115.71 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
<b>115.71 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
<b>115.71 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
<b>115.71 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes

	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
<b>115.71 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
<b>115.71 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
<b>115.71 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
<b>115.71 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
<b>115.71 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes

<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
<b>115.73 (c)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (d)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	yes

	abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	
<b>115.73 (e)</b>	<b>Reporting to inmates</b>	
	Does the agency document all such notifications or attempted notifications?	yes
<b>115.76 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.76 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
<b>115.76 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
<b>115.76 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
<b>115.77 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes

	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
<b>115.77 (b)</b>	<b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
<b>115.78 (a)</b>	<b>Disciplinary sanctions for inmates</b>	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
<b>115.78 (b)</b>	<b>Disciplinary sanctions for inmates</b>	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
<b>115.78 (c)</b>	<b>Disciplinary sanctions for inmates</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
<b>115.78 (d)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
<b>115.78 (e)</b>	<b>Disciplinary sanctions for inmates</b>	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
<b>115.78 (f)</b>	<b>Disciplinary sanctions for inmates</b>	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish	yes



	evidence sufficient to substantiate the allegation?	
<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
<b>115.81 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	na
<b>115.81 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
<b>115.81 (e)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior	yes

	sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	
<b>115.82 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
<b>115.82 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
<b>115.82 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
<b>115.82 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
<b>115.83 (b)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
<b>115.83 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse</b>	

	<b>victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
<b>115.83 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
<b>115.83 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
<b>115.83 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.83 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes

<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
<b>115.86 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.86 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
<b>115.86 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.86 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

<b>115.87 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
<b>115.87 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
<b>115.87 (c)</b>	<b>Data collection</b>	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
<b>115.87 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.87 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
<b>115.87 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
<b>115.88 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	yes

	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?	
<b>115.88 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
<b>115.88 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
<b>115.88 (d)</b>	<b>Data review for corrective action</b>	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
<b>115.89 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
<b>115.89 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
<b>115.89 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.89 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	

	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	no
<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	yes
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
<b>115.403</b>	<b>Audit contents and findings</b>	

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