

MICHIGAN DEPARTMENT OF CORRECTIONS <b>POLICY DIRECTIVE</b>		EFFECTIVE DATE 09/15/2015	NUMBER 03.03.140
SUBJECT PROHIBITED SEXUAL CONDUCT INVOLVING PRISONERS		SUPERSEDES 03.03.140 (02/18/2015)	
		AUTHORITY MCL 750.145m; MCL 750.520c; MCL 791.203; MCL 791.204; 42 USCA 15601 et. seq.; Prison Rape Elimination Act (PREA) of 2003	
		PAGE            1            OF            7	

**POLICY STATEMENT:**

The Department has a zero tolerance standard for sexual abuse between or among prisoners. The Department also has a zero tolerance for staff sexual misconduct, staff sexual harassment, and staff overfamiliarity with prisoners.

**RELATED POLICIES:**

- 01.01.140 Internal Affairs
- 02.03.100 Employee Discipline
- 03.03.105 Prisoner Discipline
- 03.03.110 Special Problem Offender Notice
- 03.03.130 Humane Treatment and Living Conditions for Prisoners
- 04.05.120 Segregation Standards

**POLICY:**

DEFINITIONS

- A. Employee - For purposes of this policy only, Employee refers to Michigan Department of Corrections (MDOC) employees, contractors, and volunteers.
- B. Prisoner - For purposes of this policy, “prisoner” includes probationers in the Special Alternative Incarceration Program (SAI) and parolees residing in a Reentry facility unless otherwise stated.
- C. Prisoner-on-Prisoner Sexual Abuse - Abusive sexual contact and non-consensual sexual acts by a prisoner with a prisoner who has not consented, including a prisoner who is unable to consent or refuse. For purposes of this policy:
  - 1. “Abusive sexual contact” means intentional physical contact either directly or through the clothing with another prisoner for sexual purposes including intentional touching of sexual areas such as inner thigh or buttocks but not including non-consensual sexual acts. This does not apply to incidental contact as a result of a physical altercation.
  - 2. “Non-consensual sexual acts” means intercourse, cunnilingus, fellatio, or any other penetration or intrusion, however slight, of any part of another prisoner’s body or of any object into the genital or anal opening of another prisoner’s body.
- D. Prisoner-on-Prisoner Sexual Harassment - Includes repeated and unwelcome sexual advances, requests for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one prisoner directed toward another prisoner.
- E. Staff Overfamiliarity - Conduct between an employee and a prisoner which has resulted in or is likely to result in intimacy, including but not limited to a kiss or a hug, or a close personal or non-work related association.

DOCUMENT TYPE POLICY DIRECTIVE	EFFECTIVE DATE 09/15/2015	NUMBER 03.03.140	PAGE 2 OF 7
-----------------------------------	------------------------------	---------------------	-------------

- F. Staff-on-Prisoner Sexual Harassment - Includes gestures and verbal or written statements or comments of a sexual nature directed by staff to a prisoner, including demeaning references to gender, sexually suggestive or derogatory comments about body or clothing and profane or obscene language or gestures.
- G. Staff-on-Prisoner Sexual Misconduct (Under Prison Rape Elimination Act (PREA) guidelines this is also referred to as staff-on-prisoner sexual abuse) - A sexual act directed by an employee toward a prisoner, including any of the following acts, willing or unwilling on the part of the prisoner:
1. An attempted, threatened, or requested sexual act or helping, advising, or encouraging another employee to engage in a sexual act. This does not include acts related to official duties (e.g., strip searches, pat down searches, chest compressions during CPR).
  2. The intentional touching, either directly or through clothing, of a prisoner's genitals, anus, groin, breast, inner thigh, or buttocks with the intent to abuse, arouse, or gratify the sexual desire of any person.
  3. Contact between the mouth and any body part where the employee has the intent to abuse, arouse or gratify sexual desire.
  4. Invasion of privacy for sexual gratification, indecent exposure, or voyeurism.

#### GENERAL INFORMATION

- H. The PREA Administrator, Budget and Operations Administration (BOA) shall maintain a PREA Manual which shall be reviewed and updated as needed. The manual shall be consistent with PREA standards and outline methods consistent with maintaining PREA compliance.
- I. This policy does not apply to probationers and parolees who are being supervised in the community except as set forth in Paragraph S. However, staff sexual misconduct/sexual harassment and staff overfamiliarity involving these offenders also is prohibited and shall be reported and investigated as set forth in [PD 01.01.140](#) "Internal Affairs" and [PD 02.03.100](#) "Employee Discipline."
- J. Allegations of prisoner sexual assaults against staff shall be reported to the Michigan State Police (MSP) or other appropriate law enforcement agency for investigation. A prisoner in a Correctional Facilities Administration (CFA) facility also shall be subject to discipline in accordance with PD 03.03.105 "Prisoner Discipline," and as appropriate, reclassification to a higher security level, including segregation, in accordance with [PD 05.01.130](#) "Prisoner Security Classification" and [PD 04.05.120](#) "Segregation Standards."
- K. Wardens shall designate a Prison Rape Elimination Act (PREA) Coordinator at each facility under his/her supervision. The PREA Coordinator shall have sufficient time and authority to coordinate the facility's efforts to comply with the standards outlined in the PREA Manual. The PREA Coordinator shall be responsible for monitoring and providing assistance regarding all aspects of PREA compliance in areas such as training, education, reporting, documentation and investigation of PREA-related allegations.
- L. To ensure compliance with standards developed by the National Prison Rape Elimination Commission, audits will be conducted by approved auditors in accordance with the Department of Justice (DOJ) PREA Audit Instrument.

DOCUMENT TYPE POLICY DIRECTIVE	EFFECTIVE DATE 09/15/2015	NUMBER 03.03.140	PAGE 3 OF 7
-----------------------------------	------------------------------	---------------------	-------------

- M. For facilities housing male offenders, female staff must announce their presence each time they enter a prisoner housing unit. Staff must knock on the most interior door and announce in a loud clear voice, "female(s) in the area" and wait 10 seconds before entering.
- N. For facilities housing female offenders, male staff must announce their presence each time they enter a prisoner housing unit. Staff must knock on the most interior door and announce in a loud clear voice, "male(s) in the area" and wait 10 seconds before entering. Also, at facilities housing female offenders, staff shall follow procedures outlined in WHV OP 03.03.140 "Prohibited Sexual Conduct Involving Prisoners" and SAI OP 03.03.140 "Prohibited Sexual Conduct Involving Trainees (PREA)."
- O. In addition to the PREA assessment at intake, Staff shall complete a PREA-Aggressor Risk Assessment-Prison review and PREA-Victim Risk Assessment-Prison review whenever warranted. This includes any time a prisoner is referred for an assessment, at the request of the prisoner or staff, an incident of sexual abuse has occurred or alleged to have occurred, or upon receipt of additional information that bears on the prisoner's risk of being sexually abused or being sexually abusive toward others. If any incident requires the transfer of a prisoner, the sending facility shall ensure the risk assessment(s) is completed prior to the transfer.

#### PRISON RAPE ELIMINATION ACT

- P. The Department has a zero tolerance standard for sexual abuse between or among prisoners. PREA addresses prisoner on prisoner sexual abuse, staff sexual misconduct, and staff sexual harassment in correctional facilities. PREA specifically provides for the analysis of the incident and effects of such conduct and requires the issuance of national standards to address sexual abuse in a correctional setting. The PREA Administrator shall be responsible for reporting statistical information and other data as required under the Act and for oversight of the Department's compliance with the national standards when issued. The PREA Administrator also is responsible for monitoring compliance with this policy.

#### PROHIBITED CONDUCT

- Q. Prisoners are prohibited from having any sexual contact with another prisoner. A prisoner in a CFA facility who voluntarily engages in such behavior is subject to discipline in accordance with [PD 03.03.105](#) "Prisoner Discipline" and, as appropriate, reclassification to a higher security level, including segregation, in accordance with [PD 05.01.130](#) "Prisoner Security Classification" and [PD 04.05.120](#) "Segregation Standards." A Special Problem Offender Notice (SPON) shall be issued, as appropriate, as set forth in [PD 03.03.110](#) "Special Problem Offender Notice." Parolees residing in a Reentry facility are subject to parole revocation in accordance with [PD 06.06.100](#) "Parole Violation Process." Probationers in SAI are subject to termination from that program and may be returned to the jurisdiction of the sentencing court.
- R. Staff sexual harassment/sexual misconduct and staff overfamiliarity are violations of Department work rules. Staff that engage in such conduct are subject to disciplinary action pursuant to [PD 02.03.100](#) "Employee Discipline." It also is a felony for staff to engage in sexual contact with a prisoner, as defined in MCL 750.520c.
- S. It is a felony for a contractual employee or a volunteer to engage in sexual contact with an offender, as defined in MCL 750.520c. A contractual employee or volunteer who engages in such behavior shall be prohibited from providing services within any Department correctional facility. In addition, a parolee or a probationer shall not be required to receive services from a contractual employee or volunteer in the community

DOCUMENT TYPE POLICY DIRECTIVE	EFFECTIVE DATE 09/15/2015	NUMBER 03.03.140	PAGE 4 OF 7
-----------------------------------	------------------------------	---------------------	-------------

known to have engaged in such conduct. If such contact is reported by a parolee or probationer, the supervising agent shall ensure that the parolee or probationer is not required to have any further contact with the individual pending investigation of the matter. The supervising agent also shall immediately notify the Deputy Director of Field Operations Administration (FOA) or designee of the matter through the appropriate chain of command. The FOA Deputy Director or designee shall ensure a prompt investigation is conducted to verify whether the contractual employee or volunteer was found to have engaged in such conduct and, if verified, take appropriate action to ensure the individual no longer provides services to probationers or parolees.

- T. All prisoners and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations are protected from retaliation for reporting the incident or participating in the investigation.

#### CONFIDENTIALITY OF REPORTS AND INVESTIGATIONS

- U. Reasonable steps shall be taken to ensure the confidentiality of information obtained during the risk assessment process and from reports of conduct prohibited by this policy and any resulting investigations. Persons interviewed as part of an investigation shall be specifically warned not to discuss the investigation with others. Staff that intentionally compromise this confidentiality shall be subject to discipline in accordance with [PD 02.03.100](#) "Employee Discipline," prisoners in a CFA facility who intentionally compromise this confidentiality shall be subject to discipline in accordance with [PD 03.03.105](#) "Prisoner Discipline." This does not preclude staff from discussing such matters with their attorneys or in accordance with this or any other policy directive, Civil Service Commission rules and regulations, or applicable collective bargaining unit agreements. This also does not preclude prisoners from discussing such matters with their attorneys, to seek treatment, or to ensure their own safety. The PREA Administrator shall share with the facility head and his/her supervisors, as appropriate, allegations of conduct prohibited by this policy which are received directly by the PREA Section.

#### REPORTING PROHIBITED CONDUCT

- V. Staff shall immediately report any knowledge, suspicion or information regarding allegations of conduct prohibited by this policy to appropriate supervisory staff. Reports shall be taken regardless of when the incident was alleged to have occurred. Reports may be made privately to appropriate supervisory staff, through the MDOC Sexual Abuse Hotline, by completing a Department Sexual Abuse/Sexual Harassment Complaint form on the MDOC website or by contacting the Department's Internal Affairs Division. If the allegations pertain to conduct at another facility (including county jails, another state prison, federal prison or substance abuse program facility), the Warden shall provide email notification within 72 hours as follows:
  1. For allegations of abuse within the MDOC - To the appropriate facility head. The Inter-Administration Investigation Protocol issued by the CFA and FOA Deputy Directors shall be followed if the allegation is regarding the conduct of an employee from another Administration. The appropriate facility head shall verify whether the allegation had been previously investigated. If not, s/he shall ensure the allegation is entered into the Department's computerized database and investigated in a timely manner. A courtesy copy shall be forwarded to the Department's PREA Administrator.
  2. For allegations of abuse outside this Department - To the Department's PREA Administrator for documentation and forwarding to the third party facility or local law enforcement where the incident was alleged to have occurred.

DOCUMENT TYPE POLICY DIRECTIVE	EFFECTIVE DATE 09/15/2015	NUMBER 03.03.140	PAGE 5 OF 7
-----------------------------------	------------------------------	---------------------	-------------

- W. Prisoners may report allegations of conduct prohibited by this policy, including threats of such conduct and retaliation for reporting such conduct, verbally or in writing to any Department employee, through the MDOC Sexual Abuse Hotline, through the prisoner grievance process, or through the Legislative Corrections Ombudsman. If reported verbally to an employee, the employee shall document it in writing as soon as possible and report it to appropriate supervisory staff. Prisoners also may report such allegations to the PREA Administrator either in writing or through the sexual assault hotline. When receiving any report of sexual abuse or harassment, regardless of the source, staff shall promptly document and forward the complaint to the appropriate supervisory staff for investigation.
- X. Prisoners in a CFA facility who report that they have been the victim of a prisoner-on-prisoner non-consensual sexual act or staff sexual misconduct shall be referred to the Bureau of Health Care Services (BHCS) for examination, evidence collection, and treatment. They also shall be referred to BHCS mental health services staff for assessment, counseling, and other necessary mental health services consistent with the requirements set forth in [PD 04.06.180](#) "Mental Health Services." Parolees in a Reentry facility who report that they have been the victim of a prisoner-on-prisoner non-consensual sexual act or staff sexual misconduct shall be permitted to speak with a counselor available in the local community, if requested.
- Y. Prisoners in a CFA facility who make accusations of misconduct against employees, including for staff sexual misconduct/sexual harassment or staff overfamiliarity, which after investigation are determined to be unfounded may be charged with the misconduct of "Interference with the Administration of Rules," with approval of the Warden or designee. The misconduct may be elevated to class I with the approval of the CFA Deputy Director or designee. Hearings shall be conducted in accordance with [PD 03.03.105](#) "Prisoner Discipline."
- Z. Complaints filed by a prisoner regarding conduct prohibited by this policy shall serve to exhaust a prisoner's administrative remedies only when filed as a grievance through all steps of the grievance process in compliance with [PD 03.02.130](#) "Prisoner/Parolee Grievances."
- AA. Medical and mental health staff shall obtain informed consent from prisoners before reporting information about prior sexual victimization that did **not** occur in an institutional setting. A copy of the prisoner's informed consent shall be retained for auditing purposes.
- BB. Employees who are Health Care and Mental Health practitioners are required to report allegations of sexual abuse that occurred in an institutional setting, whether or not the institution is part of the department. The practitioner shall inform the prisoner of the practitioner's duty to report and that confidentiality is limited.
- CC. The facility shall report any allegations of alleged victims under the age of 18 or who are considered a vulnerable adult under a state or local vulnerable persons statute to the PREA Administrator. After the PREA Administrator receives the reported allegations, s/he will forward the allegations to the appropriate agencies.

#### INVESTIGATION OF ALLEGATIONS OF PROHIBITED CONDUCT

- DD. Investigations of prohibited sexual conduct shall be completed by staff who have received specialized investigator training as outlined in the [PREA Manual](#). All investigations shall be conducted promptly, thoroughly and objectively. All PREA investigations shall be conducted in accordance with the Sexual Abuse/Sexual Harassment Investigations

DOCUMENT TYPE POLICY DIRECTIVE	EFFECTIVE DATE 09/15/2015	NUMBER 03.03.140	PAGE 6 OF 7
-----------------------------------	------------------------------	---------------------	-------------

portion of the PREA Manual.

- EE. Facility staff shall work to avoid transferring prisoners if they are the alleged victim, perpetrator, or witness in a pending PREA related investigation. If a prisoner is transferred prior to the completion of an investigation, the facility shall document the rationale for the transfer.
- FF. Staff who are accused of, witnessed, or have personal knowledge of conduct prohibited by this policy and refuse to cooperate with an investigation shall be subject to discipline, in accordance with [PD 02.03.100](#) "Employee Discipline."
- GG. The Warden or Lake County Residential Reentry Program (LCRRP) Manager, as appropriate, shall ensure that the complainant and the victim, if not the complainant, are notified in writing of the final disposition of an investigation involving prisoner-on-prisoner sexual abuse, staff sexual misconduct/sexual harassment or staff overfamiliarity. This shall include notification of whether any disciplinary action has been taken. However, details of the discipline, including the specific charges and sanctions, shall not be provided.
- HH. Wardens and the LCRRP Manager shall ensure that information on all allegations of prisoner-on-prisoner sexual abuse, staff sexual misconduct/sexual harassment, and staff overfamiliarity are entered into the MDOC computerized database at their respective facilities and investigated. In addition, information on the outcome of each investigation shall be entered. Information on allegations that do not result in sustained rule violations shall not be retained in an employee's Personnel file or used for any purpose not authorized by this or any other policy directive. Only the Deputy Director and his/her staff involved in employee disciplinary proceedings, including the Internal Affairs Division, the PREA Administrator and his/her staff, and other staff specifically authorized by the Director or designee, shall have access to information in the MDOC computerized database.
- II. For each investigation which sustains an allegation of prisoner-on-prisoner sexual abuse, and for each investigation which results in sustained disciplinary charges for staff sexual misconduct/sexual harassment, staff designated by the Warden shall ensure that a completed United States Department of Justice Survey on Sexual Violence form (SSV-IA) is sent to the PREA Administrator along with any other documentation as requested by the PREA Administrator. If the case involves only an allegation of staff overfamiliarity, documentation shall be provided as requested by the PREA Administrator or designee.

Prisoner-on-Prisoner Sexual Abuse

- JJ. All reported allegations of prisoner-on-prisoner sexual abuse or threats of such behavior, whether reported verbally or in writing, shall be referred to the Warden or designee, or in FOA, to the Administrator of the Office of Parole and Probation Services or designee, for investigation. The assigned investigator shall personally interview the alleged victim, the alleged perpetrator, and sufficient witnesses to establish the facts, unless otherwise directed by the investigating law enforcement agency. The investigation shall be coordinated as necessary with the Hearing Investigator if misconduct charges are issued.
- KK. Allegations of prisoner-on-prisoner non-consensual sexual acts also shall be referred to the MSP or other appropriate law enforcement agency for investigation. The Department investigation shall be coordinated as necessary with the investigating law enforcement agency.

Staff Sexual Misconduct/Harassment and Staff Overfamiliarity

DOCUMENT TYPE POLICY DIRECTIVE	EFFECTIVE DATE 09/15/2015	NUMBER 03.03.140	PAGE 7 OF 7
-----------------------------------	------------------------------	---------------------	-------------

- LL. All reported allegations of staff sexual misconduct/sexual harassment or staff overfamiliarity, whether reported verbally or in writing, shall be referred for investigation as set forth in [PD 02.03.100](#) "Employee Discipline" or [PD 01.01.140](#) "Internal Affairs," as appropriate. The Administrator of the Internal Affairs Division shall ensure that all allegations, if true, would constitute a criminal act are referred to MSP or other appropriate law enforcement agency for investigation. However, the Department investigation shall proceed in accordance with PD 01.01.140 "Internal Affairs" and PD 02.03.100 "Employee Discipline" regardless of whether the referral results in criminal prosecution.
- MM. In all investigations of staff sexual misconduct/sexual harassment or staff overfamiliarity, investigators shall personally interview the complainant, the alleged victim if not the complainant, the alleged perpetrator, and sufficient witnesses to establish the facts. The investigation shall not be closed simply due to the resignation, transfer, or termination of the accused staff person.

#### ADDITIONAL MEASURES TO MINIMIZE PROHIBITED CONDUCT

- NN. The Administrator of the Training Division, BOA, shall ensure both new employee and in-service training is available to staff regarding conduct prohibited by this policy. In addition, the Administrator of the Training Division shall ensure that training is available on how to conduct investigations under this policy. Staff, including investigators and facility administrators, shall attend training as required.
- OO. The PREA Administrator shall ensure standardized educational material to educate prisoners regarding conduct prohibited by this policy, self-protection, how to report conduct or threats of conduct prohibited by this policy, and treatment and counseling is accessible to all prisoners. Educational materials shall be available to all prisoners, including any updates, in CFA and Reentry facilities and shall be incorporated into facility orientation programs. If needed, the Department will seek the assistance of interpreters for prisoners with disabilities or limited English proficiency.
- PP. Each Warden shall take reasonable measures to eliminate prisoner access to secluded areas of the facility. This includes conducting rounds of such areas as set forth in [PD 04.04.100](#) "Custody, Security, and Safety Systems."
- QQ. Each Warden shall ensure the facility's physical plant layout enables prisoners to shower, perform bodily functions and change clothing without nonmedical staff of the opposite gender viewing the prisoner's breasts, buttocks or genitalia except in exigent circumstances or when such viewing is incidental to routine cell checks. Instances of cross-gender viewing in exigent circumstances shall be documented in writing to the Warden and retained for the PREA Audit.

#### Identification/Counseling of Prisoners with Histories of Sexual Victimization or Sexually Aggressive Behavior

- RR. Prisoners received at a reception facility who have been convicted of or identified as having a history of a predatory or assaultive sexual offense shall be interviewed by a Qualified Mental Health Professional or other appropriate staff as set forth in [PD 04.01.105](#) "Reception Facility Services." Prisoners identified as having a history of physical or sexual abuse, or who pose a reasonable concern that they may be sexually victimized while incarcerated due to age, physical stature, history, or physical or mental disabilities shall be similarly referred as set forth in PD 04.01.105.
- SS. Prisoners with a history of sexually aggressive behavior, or who are found guilty of

DOCUMENT TYPE POLICY DIRECTIVE	EFFECTIVE DATE 09/15/2015	NUMBER 03.03.140	PAGE 8 OF 7
-----------------------------------	------------------------------	---------------------	-------------

sexually aggressive behavior while incarcerated, shall be referred to BHCS mental health services staff for assessment, counseling, and other necessary mental health services, as appropriate, consistent with the requirements set forth in [PD 04.06.180](#) "Mental Health Services." Prisoners who are reasonably believed to be at risk of sexual victimization while incarcerated, or who have been sexually assaulted while incarcerated, shall similarly be referred.

Placement of Prisoner With History of Sexually Aggressive Behavior Involving a Victim of the Same Sex

- TT. With approval of the Administrator of the Operations Division, CFA, or designee, a prisoner identified at a reception facility as having used force or the threat of force to engage in, or attempt to engage in, abusive sexual contact or a non-consensual sexual act with a victim of the same sex shall be placed only in single-cell housing only in a Level IV or V facility in accordance with [PD 04.01.105](#) "Reception Facility Services" to reduce the potential assault risk to other prisoners. Similarly, if a prisoner is found guilty of misconduct for using force or the threat of force to engage in, or attempt to engage in, abusive sexual contact or a non-consensual sexual act with a victim of the same sex while incarcerated in a CFA facility, the prisoner shall be placed only in single-cell housing in a Level IV or V facility unless the Warden believes that such placement is not necessary and the CFA Operations Division Administrator or designee approves alternative placement.
- UU. Whenever it is determined that a prisoner may be placed only in single-cell housing in a Level IV or V facility, the prisoner's continuing need for such placement shall be reassessed whenever s/he is screened for security classification pursuant to [PD 05.01.130](#) "Prisoner Security Classification," the original reason for the placement and the prisoner's conduct since the original incident that led to the placement shall be taken into consideration. If it is believed that the prisoner may no longer require such placement, the case shall be referred to the Warden for review. If the Warden agrees that the prisoner may no longer require such placement, the case shall be referred to the CFA Operations Division Administrator or designee for a final determination. In all circumstances, however, the case shall be referred to the CFA Operations Division Administrator or designee for review at least every five years after the initial placement decision was made.
- VV. The CFA Deputy Director may require that a prisoner who has used force or the threat of force to commit or attempt to commit a non-consensual sexual act involving a victim of the same sex be placed only in single-cell housing in a Level IV or V facility, or allow alternative placement, on his/her own initiative.

VICTIM ADVOCATES

- WW. The Department shall attempt to contract for the services of victim advocates from rape crisis centers, which are not part of the criminal justice system, that provide counseling and confidentiality to prisoner victims. If a victim advocate is not available to provide victim advocate services, the facility shall contact the local hospital in an attempt to locate a victim advocate or attempt to make available a qualified medical or mental health care staff member.
- XX. The Department may provide prisoner victims with access to outside victim advocates for emotional support services related to sexual abuse if available.

PROCEDURES

- YY. The FOA Deputy Director and Wardens shall ensure that procedures are developed to

DOCUMENT TYPE POLICY DIRECTIVE	EFFECTIVE DATE 09/15/2015	NUMBER 03.03.140	PAGE 9 OF 7
-----------------------------------	------------------------------	---------------------	-------------

implement requirements set forth in this policy directive. The procedures shall be sent to the PREA Administrator for review and approval within 60 calendar days after the effective date of this policy directive.

#### AUDIT ELEMENTS

- ZZ. A Primary Audit Elements List has been developed and is available on the Department's Document Access System to assist with self-audit of this policy pursuant to [PD 01.05.100](#) "Self Audit of Policies and Procedures."

APPROVED: HEW 08/03/2015

[05/16/11 - PREA Memo - "PREA Documentation Requirements"](#)  
[PREA Manual](#)  
[PREA Risk Assessments Manual](#)