

**FINAL AUDIT REPORT:
NORTHERN NEVADA CORRECTIONAL CENTER**

**PREA AUDIT: AUDITOR'S SUMMARY REPORT
ADULT PRISONS & JAILS**



Name of facility: Northern Nevada Correctional Center	
Physical Address: 1721 E Snyder Avenue, Carson City, NV 89702	
Date report submitted: September 17, 2015	
Auditor Information Cheyenne Evans	
Address: 919 Ala Moana Blvd. Suite #116, Honolulu, HI 96814	
E-Mail: cheyenne.l.evans@hawaii.gov	
Telephone number: 808-266-2674	
Date of facility visit: 07/13/15 to 07/15/15	
Facility Information	
Facility mailing address: (if different from above) PO Box 7000, Carson City, NV 89702	
Facility Telephone Number: 775-887-3285	
NNCC is:	
<input type="checkbox"/> Military	<input type="checkbox"/> County
<input type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal
<input type="checkbox"/> Private not for profit	<input type="checkbox"/> Federal
	<input checked="" type="checkbox"/> State
Facility Type: <input type="checkbox"/> Jail <input checked="" type="checkbox"/> Prison	
Name of PREA Compliance Manager: Shannon Moyle Title: CCS III, Facility PREA Manager	
E-Mail Address: lwuest@doc.nv.gov	
Phone Number: 702-879-6884	
Agency Information	
Name of agency: Nevada Department of Corrections	
Governing authority or parent agency: (if applicable) N/A	
Physical address: 550 Snyder Ave. Bldg. 17, Carson City, NV 89701	
Mailing address: (if different from above)	
Telephone Number: 775-887-3285	
Agency Chief Executive Officer	
Name: James "Greg" Cox	Title: Director
E-Mail Address: gcox@doc.nv.gov	Telephone Number: 775-887-9216
Agency-Wide PREA Coordinator	
Name: Pamela Del Porto	Title: Inspector General/PREA Coordinator
E-Mail Address: pdelporto@doc.nv.gov	Telephone Number: 775-887-3395

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NARRATIVE:

The PREA audit for the Nevada Department of Corrections (NDOC), Northern Nevada Correction Center (NNCC) was conducted from July 13, 2015 to July 15, 2015, by this writer, Cheyenne Evans, a Certified Department of Justice (DOJ) PREA Auditor with the assistance of one Support Staff Member, Gail Mirkovich, hereafter referred to as the PREA Audit Team. NNCC is located in Carson City, Nevada.

The physical audit began with a "meet and greet" with key administrators to include Warden Isidro Baca, Inspector General Pam Del Porto, NDOC PREA Program Manager Deborah Striplin, Facility PREA Compliance Manager Shannon Moyle, Stewart Conservation Camp Manager Lieutenant Robert Hartman, Associate Warden of Operations Ron Schreckengost, Associate Warden of Programs Elizabeth Walsh, Correctional Caseworker Ronald Hannah, Lieutenant Matthew Smith, and Lieutenant John Alishio and the PREA Audit Team. The areas toured during the three day site visit consisted of all nine housing units includes the Infirmary and Intake. Other areas that were toured were the Gym, Chapel, Law Library Coffee Shop, Culinary / Dining / Kitchen, Education, Laundry, Maintenance and Auto Shop, Canteen, Property and Prison Industries (PI) / Vocational Training area, the Command Center housing Commander Offices, Administrative Staff Offices, and the File Retention room.

A tentative agenda had been generated in advance and slight modification did occur during the physical audit. The first day of the audit was primarily spent touring about 411, 105 square feet of NNCC which sits on an 11, 00 acre parcel that is shared with Stewart Conservation Camp (SCC).

After the day one tour, the PREA Audit team returned to NNCC at 2100 hours to start random staff and some specialized staff interviews for the overnight shift.

The second day was spent interviewing random and LGBTI / specialized inmates and staff to include medical and mental health staff. Selections for interviews were taken from Units 1, 2, 3, 4, 5, 6, 7, 8, and 10. These interviews continued on day three. Day three interviews included follow ups with inmates that had written the Audit Team prior to the beginning of the audit for the facility and interviews of the Administrative Offices or Central Office for NDOC which is less than a five minute drive from NNCC. While conducting NNCC's PREA Audit, the PREA Audit Team was able to interview Investigators, Human Resource staff, the PREA Coordinator, Deputy Director of Operations, Medical Administrators and other Specialized Staff for the NNCC audit. The personnel file reviews and background check documents for NNCC, SCC, TCC and CCC were also reviewed while at NNCC and Central Office. Investigative file reviews and NOTIS online reviews were done on the third day of the audit. During the course of the 3 day on-site audit approximately 30 random inmates were interviewed and 16 specialized inmates were interviewed by also utilizing the random inmate questionnaire in conjunction with the specialized inmate questionnaire. Also, approximately 29 random staff was interviewed and 32 specialized staff inclusive of the Central Office interviews was conducted. The PREA Audit Team ensured that the interviews covered a sampling of staff from all watch assignments.

At the end of the last day, July 15, 2015 a preliminary assessment of NNCC's compliance with the PREA Standards was conducted by discussing each Standard with the Facility PREA Compliance Manager. The areas of concern were identified with further discussion about a possible methodology to achieve compliance. The Facility PREA Manager was amenable to the recommendations and an action plan was developed and implemented.

On the last day of the Stewart Conservation Camp (SCC) audit, July 17, 2015 the PREA Audit Team held an exit debriefing in the NNCC Administration conference room for NNCC and SCC. Warden Isidro Baca, Inspector General Pam Del Porto, NDOC PREA Program Manager Deborah Striplin, Facility PREA Compliance Manager Shannon Moyle, Stewart Conservation Camp Manager Lieutenant Robert Hartman, Associate Warden of Operations Ron

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Schreckengost, Associate Warden of Programs Elizabeth Walsh, Correctional Caseworker Ronald Hannah, Lieutenant Matthew Smith, and Lieutenant John Alishio. The exit briefing highlighted NNCC's positive compliance issues, recapped the need for minor corrections, the correction action plan and implementation was developed through discussions with both the Facility PREA Compliance Manager and the Inspector General.

DESCRIPTION OF FACILITY CHARACTERISTICS

Northern Nevada Correctional Center (NNCC) is located in Carson City Nevada and is a medium security facility. The NNCC complex sits on 11, 000 and uses 411, 105 square feet of area space and lies adjacent to Stewart Conservation Camp and 0.7 miles from NDOC Central Office location. NNCC had five armed towers that surround the perimeter of the facility, as well as roving perimeter officers. NNCC opened in 1964 with only three housing units; in 2008 several housing units were added. NNCC is the Intake and Diagnostic Center for the Northern Region and has a Regional Medical Facility with acute care infirmary. During the tour the Audit team was shown the dental lab where trained inmate workers create dentures for inmate patients under supervision and a dialysis clinic. At the present time NNCC's total capacity is approximately 1486 beds and at the time of the audit the facility had approximately 1345 inmates. NNCC consists of 9 housing units out of the 9, 5 units are two man cell type housing and 4 are open dormitory housing units.

NNCC's housing unit breakdown is as follows:

Unit 1 A/B/C	General Population
Unit 2 A/B/C	Level II Transition from Unit 4
Unit 3 A/B/C	General Population
Unit 4 A/B/C	Level III Transition from Unit 7A
Unit 5 A/B/C	Re-Entry Program, Program Assistance, Preparation for reintegration into society
Unit 6 A/B	True Grit Program, Senior Structured Living
Unit 7 A/B	A-Intake, Reception, Assessment and Diagnostic B-Segregation and Disciplinary housing
Unit 8	Mental Health, Health Care Unit, Infirmary and Clinic
Unit 10	Level I, Prison Industries workers

NNCC's mission, vision, philosophy and goals are to protect and serve the public providing a safe and clean environment and accountability of the inmates. Pursue their missions with integrity and in a professional and ethical manner, raise the department to the highest standards by creating a safer Nevada. NNCC will ensure the best use of the Department's resources and educate stakeholders and customers. Improve communications.

NNCC's efforts focus on reducing idle time to promote rehabilitation by offering a variety of programs such as mental health services, educational programming, vocational programs, recreations, Re-Entry programming, and religious services. Mental health staff facilitate psycho-educational groups to address criminal thinking patterns and individual counseling with the goal of encouraging rehabilitation. NNCC also has Senior Structured Living Program, better known as "True Grit" which is designed to empower elderly inmates to live more healthy lives, enhance cognitive and physical life skills. The program is sponsored by volunteers and donations.

The educational programs are geared toward GED certification, Adult Basic Education (High School Diploma), and Vocational certificates.

NNCC's recreational program based on classification and housing may include gym access, Health and Wellness classes, and intramural-style sports on a monthly basis. Religious services are facilitated by a Chaplain and outside community volunteers. Re-entry services assist inmates in developing release plans and in obtaining identification

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documents for employment in the community upon release.

The Prison Industries (PI) area is comprised of several buildings. PI Programs include Wood, Metal, Paint and Print Shop / Book Bindery and Upholstery Shop. PI manufactures variety of products for private and government agencies. These work bays have extensive camera surveillance capabilities and on site supervisors and custody staff conducting periodic checks to assure security and safety of inmates and staff.

NNCC staff at all levels was professional and respectful and without questions or commentary were able to assist in what needed to be accomplished. The physical appearance of NNCC inclusive of the inmate housing unit was clean and sanitary for a complex of this size.

SUMMARY OF AUDIT FINDINGS

During the course of the three day on-site audit, the Audit Team interviewed approximately 30 random inmates and 16 specialized inmates by utilizing the random inmate questionnaire in conjunction with the specialized inmate questionnaire. The Audit Team interviewed approximately 29 random staff and 32 specialized staff inclusive of the Central Office interviews. The Audit Team reviewed approximately 20 institutional and medical files. The Auditor was familiar with the NOTIS system from previous audits in other NDOC facilities, the NOTIS system allows for paperless record keeping of information relevant to NDOC and NNCC. NOTIS entries were also reviewed when clarifying several open grievances on PREA issues. Documentation in NOTIS and print outs from the IG office clarified the pending PREA cases. 26 Human Resource employee records were also reviewed.

NNCC was determined to have met 42 of the 43 PREA Standards, as 1 Standard related to Contracting with Other Entities is not applicable to NDOC and NNCC. Please see the remaining pages of this report for an assessment of each PREA Standard.

Number of standards exceeded: 0

Number of standards met: 42

Number of standards not met: 0

Number of standards not applicable: 01 Contracting with other entities for the confinement of inmates.

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115.11	ZERO TOLERANCE OF SEXUAL ABUSE AND SEXUAL HARASSMENT; PREA COORDINATOR
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input checked="" type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action)	
Auditor comments, including corrective actions needed if does not meet standard	
<p>NDOC policies/procedures AR 421 and OP 421 outlines the agency's written policy mandating a zero tolerance policy toward all forms of sexual abuse, sexual harassment, and sets forth procedures for the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. NDOC policy AR 421.18 includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment.</p> <p>The agency employs an upper-level, agency-wide PREA Coordinator, whose position functions as the NDOC Inspector General, located within the Inspector General Office. The position has sufficient time and authority to develop, implement, and oversee the agency's efforts to comply with PREA in all of its facilities.</p> <p>NDOC has designated the Correctional Casework Specialist III as the Facility PREA Compliance Manager. The position has sufficient time and authority to develop, implement, and oversee the agency's efforts to comply with PREA in all of its facilities.</p>	

115.12	CONTRACTING WITH OTHER ENTITIES FOR THE CONFINEMENT OF INMATES
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action) <input checked="" type="checkbox"/> NOT APPLICABLE	
Auditor comments, including corrective actions needed if does not meet standard	
<p>The information received through interviews and supporting documentations indicates that NDOC has not entered into or renewed a contract for the confinement of inmates on or after August 20, 2012, or since the last PREA audit. This standard is not applicable to NDOC and NNCC.</p>	

115.13	SUPERVISION AND MONITORING
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input checked="" type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action)	
Auditor comments, including corrective actions needed if does not meet standard	
<p>NNCC has developed, documented, and made its "best efforts" to comply on a regular basis with a staffing plan that provides for adequate staffing levels, video monitoring, and considers the factors identified in section a.1-11. According to NDOC policy/procedure AR 326, any deviations from the minimum staffing requirements are reported</p>	

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to the Warden via the Associate Warden.

NDOC's PREA Coordinator meets annually with the Facility Warden to discuss whether adjustments are necessary to the staffing plan, video monitoring technologies, and the allocation or reallocation of Agency or Facility resources.

NDOC policy/procedure AR 421 and NNCC OP 333 require intermediate or higher level supervisors to conduct unannounced rounds and that staff are prohibited from alerting other staff members to these unannounced supervisory rounds. During interviews, supervisors reported that if they observed a staff member alerting other staff, they would counsel about the policy and rules. Then, if it were to occur a second time the staff member would be placed on report. Copies of NOTIS entries were provided that shows documentation of unannounced rounds being conducted by NNCC intermediate or higher level supervisors.

115.14 YOUTHFUL INMATES

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

Auditor comments, including corrective actions needed if does not meet standard

NNCC has housed 1 youthful offender within the last 12 months for an average stay of 5 days. Youthful inmate was housed in an isolated area of Unit 8A. The facility did maintain sight, sound, and physical separation between youthful inmates and adult inmates and in areas outside the housing unit, there was direct staff supervision.

NDOC policy/procedure AR 421 and the PREA Manual state that the facility prohibits placing youthful inmates in a housing unit in which the youthful inmate will have sight, sound, or physical contact with any adult inmate. Also, the NNCC Operations procedure OP 502 youthful offender articulates the initial Intake, housing, movement and Classification process of youthful inmates and states that the youthful inmate, while housed in Unit 8A, will be placed in a cell which maintains sight and sound separation between him and the adult inmates. During the tour, the PREA Audit Team inspected Unit 8 which had previously housed PREA Youthful Offenders. This area would be compliant with this standard.

115.15 LIMITS TO CROSS GENDER VIEWING AND SEARCHES

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

Auditor comments, including corrective actions needed if does not meet standard

NDOC policy/procedure AR 421 and NNCC OP 422 Prohibits non-medical staff from conducting cross-gender strip searches or cross-gender visual body cavity searches, except in exigent circumstances. The policy requires that all exigent cross-gender visual body cavity searches be reported to the Warden and that they are documented in writing in NOTIS. NNCC occasionally houses female inmate but is usually transferred out within 3 to 5 days.

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NNCC OP 422 requires that opposite gender staff announce their presence when entering the unit. There was 1 female inmate being housed in the Infirmary and was interviewed by the Audit Team, the female inmate indicated that she was only there for a few days and was just told she was going to be transferred out within a day or two. She also confirmed the announcements of opposite gender and has privacy when utilizing the facilities, toilet and shower. Also when interviews with male inmate indicated when a female enters their housing announcements are made. NNCC is in compliance with this standard.

NDOC policy/procedure AR 421, the PREA Manual, and NNCC Operational Procedure OP 422 prohibit searches of transgender or intersex inmates for the sole purpose of determining gender status. NNCC reported that all security staff has received training on conducting pat down searches of transgender and intersex inmates. The standard requires that it is conducted in a professional, respectful, and least intrusive manner, while balancing the security needs of the facility.

115.16	INMATES WITH DISABILITIES AND INMATES WHO ARE LIMITED ENGLISH PROFICIENT
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

NDOC policy/procedure AR 421 states that all inmates will be afforded PREA education, including inmates who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. NDOC policy/procedure AR 421 and the PREA Manual outline the agency's established procedures to provide disabled inmates equal opportunity to benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. NNCC's comprehensive inmate education video has been formatted in English, Spanish, and close captioning for both, and NNCC has access to information in Braille, if an inmate had disabilities impacting both his sight and hearing.

NDOC policy/procedure AR 421 and the PREA Manual prohibit the use of inmate interpreters, inmate readers, or other types of inmate assistance. During inmate and staff interviews, some were not aware of the NDOC's contracted services for interpreters.

Based on the prison's population, the primary secondary language of inmates appears to be Spanish. The NDOC PREA handout, posters, and education video are formatted in both English and Spanish.

115.17	HIRING AND PROMOTION DECISIONS
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

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NDOC policy/procedure AR 300, AR 421, and the PREA Manual address the provision of 115.17(a)-1 by prohibiting the hiring and promoting of anyone, or utilizing the services of any contractor or volunteer, who:

- Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution;
- 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.

AR 300, AR 421, and the PREA Manual require that NDOC considers any incidents of sexual harassment when making a decision for hire, promotion or utilization as a contractor or volunteer. A provision was added to the performance evaluation to ensure that current employees acknowledge and certify annually based on another facility's corrective action plan.

AR 300, AR 421, and the PREA Manual state that before hiring any new staff member or utilizing the services of a contractor or volunteer, a criminal background records check shall be performed and HR will make its best effort 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. AR 212 Contracts, states that "mandatory background checks on contractors/vendors will be completed no less than every three years in compliance with PREA federal mandates; the Contracts unit is required to maintain tracking documentation for audit purposes."

AR 421 and the PREA Manual state that HR and IG shall perform criminal background records check of all current employees every three years, beginning the first year of each PREA audit cycle. This was the result of a prior corrective action in another facility's PREA audit. AR 421 also states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

AR 308 authorizes only the Department Personnel Division staff to provide employment verifications, references, or other requests pertaining to employment information. The confidentiality of the files covered by AR 308 is governed by NAC 284.718: Confidential Records and NAC 284-726: Access to Confidential Records. AR 339 categorizes any false or misleading statements, including omissions, either verbally or in a written report or other documents as a Class 5 offense with the sanctioned result being discharge.

Based on interviews with HR staff, they are conducting background checks of prospective employees, promotional employees, contractors, and volunteers by utilizing NCIC, screening with prior employers and institutional employers, and contacting job references. A review of random HR files did not reveal any significant discrepancies with practice, except when fingerprints were not done but local criminal background checks were cleared prior to receiving the fingerprint clearance, files were unorganized and clearances for new employees, promotions were out of order, unable to find. The PREA Audit team was given a current list to pick files from and several of the files were of employees that no longer worked for the department. Majority of the HR staff that we dealt with were new and had little knowledge to the PREA Standard and seemed to be unorganized. PREA Coordinator conducted immediate corrective action with HR staff to ensure the timely follow up with discrepancies such as consistent filing system and clearance forms, submissions, and a systematic way of conducting the clearances and files.

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115.18	UPGRADES TO FACILITIES AND TECHNOLOGY
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input checked="" type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action)	
Auditor comments, including corrective actions needed if does not meet standard	
<p>NDOC/NNCC has not acquired any new facilities or made any substantial expansions or modifications of existing facilities since August 20, 2012, or since the last PREA audit. NNCC has upgraded and repaired current monitoring systems in specific areas of NNCC, since August 20, 2012 or since the last PREA audit.</p>	

115.21	EVIDENCE PROTOCOL AND FORENSIC MEDICAL EXAMINATIONS
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input checked="" type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action)	
Auditor comments, including corrective actions needed if does not meet standard	
<p>NDOC's Inspector General (IG) is responsible for conducting both the administrative and the criminal investigations for sexual abuse and sexual harassment. According to policy/procedure AR 421 Investigations, the IG investigators follow a uniform evidence protocol when conducting sexual abuse investigations and it is based on the most recent edition of DOJ's Office on Violence Against Women Publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents".</p> <p>NNCC offers all inmates who experience sexual abuse access to forensic medical examinations. An MOU with Las Vegas Rape Crisis Center According to policy/procedure INP 200 and AR 421, forensic exams are offered without financial cost to the victim. Forensic exams are conducted by SAFEs or SANEs, and when SAFEs or SANEs are not available, a qualified medical practitioner performs forensic medical exams. Based on a MOU with the Crisis Call Center, Inc. (CCC) a victim advocate from CCC will be made available to the victim during forensic exams.</p> <p>According to policy/procedure INP 200, when requested by the victim, a qualified agency staff member shall accompany and support the victim through the forensic exam process and investigatory interviews. NNCC provided NIC training certificates for the medical or mental health staff, which completed the PREA: Behavior Health Care for Sexual Assault Victims in a Confinement Setting webinar.</p>	

115.22	POLICIES TO ENSURE REFERRALS OF ALLEGATIONS FOR INVESTIGATIONS
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input checked="" type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action)	

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Auditor comments, including corrective actions needed if does not meet standard

NDOC policy/procedure AR 421 Investigation of Allegations, states that the "NDOC Office of the Inspector General will investigate all allegations of staff on inmate sexual abuse, sexual harassment, and inmate on inmate sexual abuse." Also, NDOC policy/procedure AR 421 and the PREA Manual state that "investigative staff assigned to the IG's office will conduct investigations into allegations or reports of sexual abuse or suspected sexual abuse of an inmate by a staff member." The language required by PREA standard 115.22(a)-1 is that the "agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment." The PREA Coordinator initiated corrective action by drafting an amendment to add the specific language relevant to sexual harassment. AR 421 and the PREA Manual define inmate on inmate sexual harassment as "repeated and unwelcome sexual advances, requests for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one inmate directed toward another."

The NDOC's PREA website includes a link to NDOC policy/procedure AR421 that describes the referral of allegations of sexual abuse or sexual harassment for criminal investigation. The NDOC does publish an extensive list of their policies/procedures under the heading "about NDOC: Administrative Regulations Table of Context. PREA standard 115.22(c) is not applicable. NDOC documents all referrals of allegations of sexual abuse or sexual harassment for criminal and administrative investigation by the IG's Office, and there are procedures in place governing the conduct of these investigations.

115.31 EMPLOYEE TRAINING

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

Auditor comments, including corrective actions needed if does not meet standard

The lesson plan and the power point dated March 25, 2014 were reviewed and the training materials cover the required subject matter for this Standard. The PREA acknowledgement forms submitted for 2015 included an affirmation that the employee understood NDOC's zero tolerance policy and the parameters covered in the PREA training.

The training is tailored to both male and female inmates, NNCC indicated that all staff received the required PREA training and on "off years," the agency does provide employees with information about current policies regarding PREA sexual abuse and sexual harassment. In addition, staff have access to the PREA policies, posters, and memorandums year round. According to policy/procedure AR 421, employees will receive refresher trainings on PREA every two years and this was verified by staff interviews.

115.32 VOLUNTEER AND CONTRACTOR TRAINING

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

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Auditor comments, including corrective actions needed if does not meet standard

NDOC PREA manual stipulates volunteer and contractor receive training should they have contact with inmates for more than 20 hours a week. All volunteers and contractors will be notified of the departments zero tolerance policy. NDF volunteers / contractors are sent to the same training as the custody staff and receive the same updates. Interviews with NDF staff had verified their training by the knowledge they possessed of PREA. Chapel and re-entry volunteers receive a shorter training curriculum which, after reviewing meets the standard.

115.33

INMATE EDUCATION

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

Auditor comments, including corrective actions needed if does not meet standard

According to policy/procedure AR 421, all inmates during the initial intake orientation receive information explaining the department's zero tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. NNCC is an intake facility in the Northern Region and it has a reception, assessment, and diagnostic unit. The inmate receives PREA handouts upon admission and the comprehensive inmate education video is shown to the inmate at intake, or at the intake housing unit. NNCC provides comprehensive education through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding Departmental policies and procedures for responding to such incidents.

The inmates sign the PREA orientation acknowledgment form, acknowledging receipt of this information and this is entered into NOTIS. The facility does have the PREA information available in Braille for those who are visually impaired.

115.34

SPECIALIZED TRAINING: INVESTIGATIONS

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

Auditor comments, including corrective actions needed if does not meet standard

Policy/procedure AR 421 states that the IG shall ensure that investigators are trained in conducting sexual abuse investigations in confinement settings. NNCC provided training certificates from investigators showing that they completed the three hour training titled PREA: Investigating Sexual Abuse in a Confinement Setting, presented by the National Institute of Corrections.

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115.35	SPECIALIZED TRAINING: MEDICAL AND MENTAL HEALTH CARE
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input checked="" type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action)	
Auditor comments, including corrective actions needed if does not meet standard	
<p>NDOC has a policy/procedure, AR 421, which states that all full and part time medical and mental health service providers who work regularly in its facilities have received specialized PREA training. NNCC maintains documentation showing that medical and mental health practitioners have completed the required training. Certificates of Completion on the PREA trainings: Behavioral Health Care for Sexual Assault Victims in a Confinement Setting and Medical Health Care for Sexual Assault Victims in a Confinement Setting, were provided as proof of training and documentation.</p>	

115.41	SCREENING FOR RISK OF VICTIMIZATION AND ABUSIVENESS
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input checked="" type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action)	
Auditor comments, including corrective actions needed if does not meet standard	
<p>NDOC has a policy/procedure, AR 421, that all inmates shall be assessed for their risk of being sexually abused by or abusive toward other inmates during an intake screening and upon transfer to another institution/facility. According to policy/procedure AR 573 PREA Screening and Classification, screening for risk of sexual victimization or sexual abusiveness shall be completed within 72 hours of arrival at an institution or facility, excluding holidays.</p> <p>NDOC has a policy/procedure, AR 573, that requires the facility to reassess each inmate's risk of victimization or abusiveness within 30 days of arrival at the facility, or when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of being sexually victimized or being sexually abusive. AR 573 prohibits the facility from disciplining inmates for refusing to answer, or for not disclosing complete information in response to questions asked during the assessments. Inmates will be reassessed at each 6 month regular review.</p>	

115.42	USE OF SCREENING INFORMATION
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input checked="" type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action)	
Auditor comments, including corrective actions needed if does not meet standard	
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NDOC has a policy/procedure, AR 573, which states that staff shall use the information from the risk assessment to make informed housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. NNCC utilizes NOTIS alerts and all inmates are reviewed every six months at their classification reviews.

AR 573 makes no mention of the PREA standard 115.42(c)-1 that states the agency/facility makes housing and program assignments for transgender or intersex inmates in a facility on a case-by-case basis. AR 573 does contain a generalized statement that staff shall make individualized determinations about how to ensure the safety of each inmate. NDOC/NNCC does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status.

115.43	PROTECTIVE CUSTODY
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

NDOC has a policy/procedure, AR 573, that prohibits the placement of inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made and it has been determined that there are no available alternative means of separation from likely abusers.

According to NDOC policy/procedure AR 573 and NNCC OP 573, inmates placed in segregated housing for protective custody shall have access to programs, privileges, education, and work opportunities to the extent possible; however HDSP has a practice to ensure safe housing in general population for the victim, if applicable. If an involuntary segregated housing assignment is made, then every 30 days, NNCC staff shall afford each inmate a review to determine whether there is a continuing need for separation from the general population.

115.51	INMATE REPORTING
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

NDOC has established procedures allowing for multiple internal ways for inmates to report privately to agency officials about PREA allegations. NDOC policy/procedure AR 421 states that reporting can include verbal complaints to any department employee, written complaints by inmate grievances or inmate kites, calling or emailing the NDOC Family Services Office, or writing to the Nevada Attorney General's Office. NDOC does not house inmates solely for civil immigration purposes and the U.S. Marshals would manage these inmates at the relevant federal facility.

NDOC policy/procedure AR 421 and the PREA Manual states that all staff shall accept reports made verbally, in writing, anonymously, and from third parties. It also requires that "any staff member who receives a verbal or

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written report of a sexual assault to immediately report the information through their chain of command." The Auditor verified through staff interviews, that in practice, oral reports are sufficient and it is the staff member's responsibility to document the oral report in a written report and in NOTIS.

A memorandum was generated by Deborah Striplin, NDOC PREA Program Manager notifying staff / employees of an anonymous reporting website and instructions on how staff can report anonymously.

115.52	EXHAUSTION OF ADMINISTRATIVE REMEDIES
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- Exceeds Standard (substantially exceeds requirement of standard)
 - Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
 - Does Not Meet Standard (requires corrective action)
- Auditor comments, including corrective actions needed if does not meet standard**

NDOC has a policy/procedure, AR 740 Inmate Grievance Procedure, which outlines the administrative procedure for dealing with inmate grievances regarding sexual abuse. It states that grievances alleging staff on inmate sexual misconduct or inmate on inmate sexual abuse will be forwarded immediately to the Appointing Authority and followed by a confidential report completed in NOTIS. Then, a copy of the grievance will be forwarded to the PREA Management team in the IG's Office for review and investigation.

AR 740 also states that all time frames are waived for allegations of sexual abuse, regardless of when the incident is alleged to have occurred, allegations of sexual abuse will not be referred to a staff member, who is the subject of the accusation of sexual abuse, inmates are not required to use an informal grievance process, or to otherwise attempt to resolve with staff an alleged incident of sexual abuse, and that a final decision on the merits shall be made within 90 days of the initial filing of the grievance. AR 421 and the PREA Manual state that third parties shall be permitted to assist and/or file on behalf of an inmate's request for administrative remedies.

NDOC policy/procedure AR 740 outlines the agency's procedure for filing an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse. The grievance shall be immediately forwarded to the highest ranking staff member on duty so that corrective action may be taken immediately, the inmate shall receive an initial response within 48 hours, and the final decision shall be issued within five calendar days. AR 740 limits the agency's ability to discipline an inmate for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the inmate filed the grievance in bad faith.

115.53	INMATE ACCESS TO OUTSIDE CONFIDENTIAL SUPPORT SERVICES
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- Exceeds Standard (substantially exceeds requirement of standard)
 - Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
 - Does Not Meet Standard (requires corrective action)
- Auditor comments, including corrective actions needed if does not meet standard**

NNCC's inmate education PREA poster does provide inmates with the contact information for outside emotional support services, including a toll free 24 hours hotline.

NDOC/NNCC does not house inmates solely for civil immigration purposes, therefore 115.53(a)-1 is not

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applicable. NNCC informs the inmates, prior to giving them access to outside support services, the extent to which communications will be monitored. AR 421 and the PREA Manual outline the confidentiality of the communication between inmates and the outside advocacy or rape crisis center. On July 13, 2015 NDOC finalized a MOU with Crisis Call Center, Inc. to provide inmates with reporting options and emotional support services related to sexual abuse.

115.54 THIRD-PARTY REPORTING

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

Auditor comments, including corrective actions needed if does not meet standard

NDOC provides a method to receive third-party reports of inmate sexual abuse or sexual harassment. Policy/procedure AR 421, which is available on NDOC's PREA website, outlines ways that visitors, inmate family members or associates, and other community members can privately report sexual abuse or sexual harassment.

115.61 STAFF AND AGENCY REPORTING DUTIES

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

Auditor comments, including corrective actions needed if does not meet standard

In compliance with PREA standard 115.61(a)-1, NNCC Operational Procedure OP 421 states that staff is required to and have a duty to report misconduct. Requires that staff immediately report any PREA violation by staff or inmates whether witnessed or reported, to the Area Supervisor. OP 421, NDOC AR 421 and the PREA Manual state that all Department staff have the affirmative duty to immediately report any retaliation against inmates or staff, who reported any knowledge, suspicion, or information regarding an incident of inmate on inmate or staff/contractor/volunteer on inmate sexual abuse or inmate on inmate or staff/contractor/volunteer on inmate sexual harassment

NDOC AR 421 and the PREA Manual require that all staff immediately report any staff neglect or violation of responsibilities that may have contributed to any incident of inmate on inmate or staff/contractor/volunteer on inmate sexual abuse or inmate on inmate or staff/contractor/volunteer on inmate sexual harassment or retaliation for reporting of an allegation by other staff or inmates. It further states that all case records associated with claims of sexual assault, sexual activity, sexual misconduct or any attempt thereof, including written reports, investigation reports, evidence, offender information, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment and/or counseling are confidential.

115.62 AGENCY PROTECTION DUTIES

- Exceeds Standard (substantially exceeds requirement of standard)

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- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
 Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

NDOC policy/procedure AR 740 requires that immediate action shall be taken once the facility learns that an inmate is subject to a substantial risk of imminent sexual abuse. During staff interviews, it was evident that HDSP staff understood the seriousness of a potential substantial risk situation and the need to immediately (now) respond.

115.63 REPORTING TO OTHER CONFINEMENT FACILITIES

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

Auditor comments, including corrective actions needed if does not meet standard

In application, the IG's Office manages PREA allegations received from other NDOC facilities and external correctional agencies and is responsible for notifying the applicable NDOC facility and external correctional agency when a complaint is received at a NDOC facility.

According to NDOC policy/procedure AR 421, all agency allegations of sexual abuse and sexual harassment not generated from a facility must be reported to the Inspector General's Office. The PREA Coordinator confirmed that the IG's Office would manage the report of a PREA incident at facility or entity that was not currently housing the inmates.

115.64 STAFF FIRST RESPONDER DUTIES

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

Auditor comments, including corrective actions needed if does not meet standard

NDOC Policy AR 421, NNCC OP 458 and the PREA Manual outline the procedure for the first security staff member to respond to an allegation of sexual abuse. It states that in cases of sexual assault for incidents reported within 72 hours of occurrence, custody staff shall ensure the victim is safe and kept separated from the aggressor, notify the supervisor, begin crime scene identification and protections measures until released by investigating body, escort the victim to the Regional Medical Facility (RMF), collect clothing, ensure each clothing item is bagged separately in brown paper bags and booked into evidence, temporarily place the suspect in a cell and immediately collect suspect's clothing prior to being left alone, escort suspect to infirmary after victim has been assessed, collect any other evidence and book it with the appropriate chain of evidence form, and include all written reports related to the sexual assault.

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If the incident occurred within a 72 hour time frame, a shift supervisor is required to complete Form B. According to Form B, if the assault was within the last 12 hours, the suspect is to be placed in an area where he/she cannot clean himself/herself. After discussion with the PREA Coordinator it was determined that the sample form B was an older version with a typo and should have read 72 hours. A directive was issued to NDOC facilities to ensure that they are using the current form.

NDOC Policy AR 421 and the PREA Manual do not include the language from PREA standard 115.64(b)-1, however NDOC Policy AR 332 Staff Reporting Responsibilities, contains a general statement requiring employees to make timely notifications to their supervisors, using the appropriate chain of command, concerning incidents, activities or events of immediate interest or concern within the jurisdiction of, or which impacts the Department and for which the employee has knowledge. It was verified that the training curriculum for all staff inclusive of non-security staff does explain this provision.

115.65	COORDINATED RESPONSE
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

NNCC utilizes OP 458: Crime Scene Preservation and Investigation and OP 613: Medical Sexual Assault Protocol as the written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership, as required by PREA standard 115.65.

115.66	PRESERVATION OF ABILITY TO PROTECT INMATES FROM CONTACT WITH ABUSERS
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

NDOC and NNCC does not deal with Unions or Collective Bargaining Agreements, however there are statutory requirements related to disciplinary action based on the Peace Officer's Bill of Rights. It is perceived that this Standard is not implicated by the mandates of State or Local laws.

115.67	AGENCY PROTECTION AGAINST RETALIATION
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

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Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

NDOC policy/procedure AR 421 states that no staff member or inmate who reports sexual abuse or sexual harassment or cooperates with sexual abuse or sexual harassment investigations will be subjected to any form of retaliation from other staff members or inmates of the Department. NNCC has designated staff with monitoring inmates for possible retaliation and documents assessments in NOTIS and to the Facility PREA Compliance Manager. NDOC/NNCC monitors the conduct or treatment of inmates or staff who reported sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation by inmates or staff. The monitoring is documented on the Policy/procedure OP 421 Sexual Assault of Inmates requires that monitoring for retaliation be conducted and documented by the assigned staff member for ninety (90) days after an incident or longer if deemed necessary.

115.68 POST-ALLEGATION PROTECTIVE CUSTODY

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

Auditor comments, including corrective actions needed if does not meet standard

NDOC policy/procedure AR 573 PREA Screening and Classification and NNCC OP 573 prohibits the placement of inmates who allege to have suffered sexual abuse in involuntary segregated housing, unless an assessment of all available alternative means of separation from likely abusers has occurred. In the past 12 months, no inmates who alleged to have suffered sexual abuse were held in involuntary segregated housing.

115.71 CRIMINAL AND ADMINISTRATIVE INVESTIGATIONS

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

Auditor comments, including corrective actions needed if does not meet standard

NDOC is obligated to comply with the Peace Officer's Bill of Rights, which has stringent time requirements for criminal and administrative investigations related to staff. The IG Investigators have been trained as required by this Standard. NDOC AR 421 and the PREA Manual state that the IG Criminal Investigators will refer all substantiated criminal violations to the Attorney General's Office for criminal prosecution.

The IG's office retains all written reports pertaining to administrative or criminal investigations of alleged sexual assault or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus an additional five years.

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115.72	EVIDENTIARY STANDARDS FOR ADMINISTRATIVE INVESTIGATIONS
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input checked="" type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action)	
Auditor comments, including corrective actions needed if does not meet standard	
<p>According to the IG Investigator and the PREA Coordinator, who is the head of the IG's Office, NDOC imposes a standard of a preponderance of the evidence for determining whether allegations of sexual abuse or sexual harassment are substantiated in an administrative investigation.</p>	

115.73	REPORTING TO INMATES
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input checked="" type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action)	
Auditor comments, including corrective actions needed if does not meet standard	
<p>NDOC has a policy, AR 457 Investigations, requiring that any inmate who makes an allegation that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency. PREA standard 115.73(b)-1 to (b)-3 is not applicable as NDOC is responsible for conducting administrative and criminal investigations. NNCC OP 740 also states that upon completion of the investigation into sexual abuse incidents the inmate "shall" be informed of the outcome by the IG Office. NOTIS entries show notification to inmate victims.</p> <p>NDOC subsequently informs the inmate, unless the agency has determined that the allegation is unfounded, whenever: the staff member is no longer posted within the inmate's unit; the staff member is no longer employed at the facility; the agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.</p> <p>The IG subsequently informs the alleged victim whenever: the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.</p>	

115.76	DISCIPLINARY SANCTIONS FOR STAFF
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input checked="" type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action)	

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Auditor comments, including corrective actions needed if does not meet standard

NDOC policy AR 421 and the PREA Manual state that all terminations for violations of the Department's sexual abuse policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies and/or relevant licensing bodies by the Inspector General's Office with documentation in the NOTIS entry related to the incident.

AR 339 states that staff members will be subject to internal discipline to include termination as defined in NDOC policy AR 339 Code of Ethics Employee Conduct Prohibitions and Penalties. AR 339 indicates that staff penalties for prohibited activities should be assessed based upon criteria established in the Chart of Corrective/Disciplinary Sanctions, which describes an available range of disciplinary action for each class of prohibited activity. According to the policy, sexual misconduct is in Class 5 which would warrant dismissal on the first offense.

115.77 CORRECTIVE ACTION FOR CONTRACTORS AND VOLUNTEERS

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

Auditor comments, including corrective actions needed if does not meet standard

NDOC policy/procedure, AR 421, does require that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. AR 421 and the PREA Manual state that any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with inmates and reported to any relevant licensing body by the Inspector General's Office with applicable NOTIS entries documented. In the past 12 months, no contractors/volunteers have been reported to law enforcement agencies and relevant licensing bodies for engaging in sexual abuse of inmates.

115.78 DISCIPLINARY SANCTIONS FOR INMATES

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

Auditor comments, including corrective actions needed if does not meet standard

In accordance with PREA standard 115.78, AR 707 states that inmates are subject to Notice of Charges resulting in disciplinary sanctions only pursuant to a formal Disciplinary Hearing following an administrative finding and/or criminal finding that an inmate engaged in inmate-on-inmate sexual abuse.

AR 421, NNCC OP 421 and the PREA Manual make no mention of providing counseling to sexual abusers; however, interviews with medical and mental health staff verified that the facility does offer therapy/individual counseling, or other interventions designed to address and correct underlying reasons or motivations for abuse.

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AR 421 also states that facilities and the Department are prohibited from applying disciplinary action against an inmate for filing any level of a grievance, unless it is clearly demonstrated and documented that the inmate filed the grievance in bad faith.

NDOC prohibits all sexual activity between inmates and consensual sexual activity between inmates is a criminal offense in Nevada. The inmates will be subject to administrative discipline and criminal prosecution.

115.81	MEDICAL AND MENTAL HEALTH SCREENINGS; HISTORY OF SEXUAL ABUSE
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

NDOC does have a policy/procedure, INP 200 and NNCC OP 613 Follow up Meeting that states that all inmates who have disclosed any prior sexual victimization during the screening process will be offered a follow-up meeting with a medical or mental health practitioner within "14 days" of the intake screening. According to policy/procedure INP 200, "a specialized binder will be located and maintained in the medical and mental health areas to identify the inmates in need of this follow-up." Notifications are notated in NOTIS.

Regarding PREA standard 115.81(b)-1, requiring that all inmates who have previously perpetrated sexual abuse during the screening be offered a follow-up meeting with mental health, NNCC medical and mental health staff claim that all inmates who have previously perpetrated sexual abuse during the screening are offered a follow-up meeting with a mental health professional within 14 days. Although information related to sexual victimization or abusiveness that occurred in an institutional setting is not strictly limited to medical and mental health practitioners, the information shared with other staff is strictly limited to informing security and management decisions, including treatment plans, housing, bed, work, education, and program assignment, or as otherwise required by federal, state, or local law.

According to policy/procedure INP 200, medical and mental health practitioners shall obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18, by completing the Consent-Release Medical Information DOC #2548.

115.82	ACCESS TO EMERGENCY MEDICAL AND MENTAL HEALTH SERVICES
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

NNCC OP 613 states inmate victims of sexual abuse while incarcerated shall be offered timely information about, timely and unimpeded access to emergency medical treatment to include timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

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According to NDOC policy procedure INP 200 Contraception, inmate victims of sexual abuse while incarcerated shall be 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.

Treatment services are provided without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

115.83	ONGOING MEDICAL AND MENTAL HEALTH CARE FOR SEXUAL ABUSE VICTIMS AND ABUSERS
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

According to NDOC policy/procedure INP 200, NNCC offers medical and mental health evaluations and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility. The policy outlines the procedure by stating that all inmates will be assessed during the intake process, inmates will be offered a follow-up within 14 days of intake screening, and treatment will be provided by practitioners when applicable, and referrals to community services if needed.

According to NDOC policy/procedure INP 200, HDSP offers tests for STIs, as medically appropriate, for inmate victims of sexual abuse while incarcerated. According to NDOC policy/procedure INP 200, NNCC attempts to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatments when deemed appropriate by mental health practitioners.

115.86	SEXUAL ABUSE INCIDENT REVIEWS
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

NDOC policy/procedure AR 421 Sexual Assault of Inmates outlines the facility's Sexual Abuse Incident Review process. The SAIR, conducted by a Multi-Disciplinary Team, shall be held 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. According to OP 421 the investigative staff member assigned to investigate allegations on inmate sexual abuse along with specifically identified facility staff will participate in the mandatory sexual abuse incident review will be upper-level management officials who will receive input from line supervisors, and medical or mental health professionals and the facility shall implement the recommendations for improvement or document its reasons for not doing so. OP 421 also states specific information to be included in the review as to whether the incident was motivated by race; ethnicity; gender identity; LGBTI identifications, status or perceived status; or gang affiliation; physical barriers and adequacy of staffing levels.

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NNCC OP 153 specifically deals with Sexual Abuse Incident Reviews and relates step by step procedures in conjunction with AR / OP 421 policy and procedures.	
115.87	DATA COLLECTION
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input checked="" type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action)	
Auditor comments, including corrective actions needed if does not meet standard	
<p>According to NDOC policy AR 421 and the PREA Manual, the IG is responsible to collect accurate, uniform data for every allegation of sexual abuse from every institution and facility using a standardized instrument and set of definitions. The PREA Manual states that the data shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Victimization conducted by Department of Justice. The incident based sexual abuse data shall be aggregated, at a minimum, annually. According to the policy, the IG and the Department shall maintain, review and collect data as needed from all incident based documents, including reports, investigation files, and sexual abuse reviews, and the data from the previous calendar year shall be available for production upon a request from the Department of Justice.</p>	

115.88	DATA REVIEW FOR CORRECTIVE ACTION
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input checked="" type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action)	
Auditor comments, including corrective actions needed if does not meet standard	
<p>According to NDOC policy AR 421 and the PREA Manual, the data collected and aggregated shall be reviewed by the Director, or designee, Deputy Director of Operations, and the IG PREA Coordinator in order to assess and improve, if necessary, the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training.</p> <p>The review will include: identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective actions for each institution, facility and the Department where inmates may be present. The policy states that the annual report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the Department's progress in addressing sexual abuse. The Department's report is readily available to the public on the Department's website after it is approved by the Director.</p>	

115.89	DATA STORAGE, PUBLICATION, AND DESTRUCTION
<input type="checkbox"/> Exceeds Standard (substantially exceeds requirement of standard) <input checked="" type="checkbox"/> Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period) <input type="checkbox"/> Does Not Meet Standard (requires corrective action)	

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Auditor comments, including corrective actions needed if does not meet standard

According to NDOC policy AR 421 and the PREA Manual, all data collected related to incidents that are alleged to be sexual abuse will be securely retained and made readily available to the public through the website, annually. Before being made publicly available, all personal identifiers will be removed. The sexual abuse data collected will be maintained for a minimum of 10 years after the date of the initial collection.

AUDITOR CERTIFICATION:

The auditor certifies that the contents of this report are accurate to the best of his/her knowledge and no conflict of interest exists with respect to his or her ability to conduct an audit of agency under review.



Cheyenne Evans
Certified DOJ PREA Auditor

9/17/15

Date