

PREA Facility Audit Report: Final

Name of Facility: Three Lakes Valley Conservation Camp

Facility Type: Prison / Jail

Date Interim Report Submitted: 04/09/2024

Date Final Report Submitted: 09/18/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Roger Lynn Benton	Date of Signature: 09/18/2024

AUDITOR INFORMATION	
Auditor name:	Benton, Roger
Email:	roger.benton@cdcr.ca.gov
Start Date of On-Site Audit:	03/01/2024
End Date of On-Site Audit:	03/02/2024

FACILITY INFORMATION	
Facility name:	Three Lakes Valley Conservation Camp
Facility physical address:	20825 Cold Creek Road , Indian Springs , Nevada - 89070
Facility mailing address:	

Primary Contact

Name:	Harold Allen
Email Address:	hallen@doc.nv.gov
Telephone Number:	725-216-6540

Warden/Jail Administrator/Sheriff/Director	
Name:	Ronald Oliver
Email Address:	roliver@doc.nv.gov
Telephone Number:	7252166400

Facility PREA Compliance Manager	
Name:	Harold Allen
Email Address:	hallen@doc.nv.gov
Telephone Number:	O: 725-216-6540
Name:	Kimberley McCoy
Email Address:	kmccoy@doc.nv.gov
Telephone Number:	O: 725-216-6420

Facility Health Service Administrator On-site	
Name:	Nowell Granados
Email Address:	ngranados@doc.nv.gov
Telephone Number:	7252166500

Facility Characteristics	
Designed facility capacity:	384
Current population of facility:	319
Average daily population for the past 12 months:	266

Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Males
Age range of population:	19-69
Facility security levels/inmate custody levels:	Minimum
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	45
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	2
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	119

AGENCY INFORMATION

Name of agency:	Nevada Department of Corrections
Governing authority or parent agency (if applicable):	
Physical Address:	5500 Snyder Avenue, Building 17, Carson City, Nevada - 89701
Mailing Address:	P.O. Box 7011, Carson City, Nevada - 89702
Telephone number:	725-216-6012

Agency Chief Executive Officer Information:

Name:	James Dzurenda
Email Address:	jdzurenda@doc.nv.gov
Telephone Number:	725-216-6010

Agency-Wide PREA Coordinator Information			
Name:	Deborah Striplin	Email Address:	dstriplin@doc.nv.gov

Facility AUDIT FINDINGS

Summary of Audit Findings

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:	
0	
Number of standards met:	
45	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-03-01
2. End date of the onsite portion of the audit:	2024-03-02

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Signs of Hope, formally Las Vegas Rape Crisis Center

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	284
15. Average daily population for the past 12 months:	266
16. Number of inmate/resident/detainee housing units:	2
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	320
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	5
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	2
40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	1
41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	4
43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	3

<p>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>1</p>
<p>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>3</p>
<p>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>Inmates are not placed in segregated housing for risk of victimization at Three lakes Valley Conservation camp as there is no Administrative Segregation housing. Learned through site tour and interviews.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>21</p>
<p>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>0</p>

<p>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>6</p>
<p>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</p>	<p>Custody staff not on-site during the audit were interviewed by telephone but were not counted in these numbers. (Used as Informal interviews)</p>
<p>INTERVIEWS</p>	
<p>Inmate/Resident/Detainee Interviews</p>	
<p>Random Inmate/Resident/Detainee Interviews</p>	
<p>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>18</p>
<p>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p> <input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None </p>
<p>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>Housing reviews and tour information, as well as the above listed characteristics.</p>
<p>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p> <input checked="" type="radio"/> Yes <input type="radio"/> No </p>

57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	16
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	3
61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	2
62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	1

<p>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>1</p>
<p>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>4</p>
<p>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>3</p>
<p>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Daily Count sheets Daily review sheets broken down by Targeted Category Staff and Inmate interviews Pre-Audit Questionnaire</p>

<p>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>1</p>
<p>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>1</p>
<p>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Daily Count sheets Daily review sheets broken down by Targeted Category Staff and Inmate interviews Pre-Audit Questionnaire</p>
<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>No text provided.</p>

Staff, Volunteer, and Contractor Interviews

Random Staff Interviews

71. Enter the total number of RANDOM STAFF who were interviewed:

14

72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)

- Length of tenure in the facility
- Shift assignment
- Work assignment
- Rank (or equivalent)
- Other (e.g., gender, race, ethnicity, languages spoken)
- None

73. Were you able to conduct the minimum number of RANDOM STAFF interviews?

- Yes
- No

74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):

No text provided.

Specialized Staff, Volunteers, and Contractor Interviews

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

75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):

27

76. Were you able to interview the Agency Head?

- Yes
- No

77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
78. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
79. Were you able to interview the PREA Compliance Manager?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

	<input checked="" type="checkbox"/> Other
If "Other," provide additional specialized staff roles interviewed:	Grievance, Mailroom, Training There are nom Youthful inmates. There are no Administrative Segregation
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of VOLUNTEERS who were interviewed:	4
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input checked="" type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	4
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input checked="" type="checkbox"/> Other

83. Provide any additional comments regarding selecting or interviewing specialized staff.	The contractors work for the Nevada Department of Forestry
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SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

84. Did you have access to all areas of the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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Was the site review an active, inquiring process that included the following:

85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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<p>88. Informal conversations with staff during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>No text provided.</p>
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Documentation Sampling

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

<p>90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>No text provided.</p>
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SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	1	0	0	1
Staff-on-inmate sexual abuse	2	0	0	2
Total	3	0	0	3

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	2	0	2	0
Staff-on-inmate sexual harassment	2	0	0	2
Total	4	0	2	2

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	0	0	0

Sexual Harassment Investigation Outcomes

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:

3

<p>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>1</p>
<p>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>2</p>
<p>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
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Sexual Harassment Investigation Files Selected for Review

<p>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>4</p>
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<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
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Inmate-on-inmate sexual harassment investigation files

<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>2</p>
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<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
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<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
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Staff-on-inmate sexual harassment investigation files	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	2
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	No text provided.
SUPPORT STAFF INFORMATION	
DOJ-certified PREA Auditors Support Staff	
115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the TOTAL NUMBER OF DOJ-CERTIFIED PREA AUDITORS who provided assistance at any point during this audit:	2

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

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Nevada Department of Corrections (NDOC) Administrative Regulation (AR) 421, Custodial Sexual Misconduct, Offender Sexual Offenses and Prison Rape Elimination Act, section 421.01, states “The Department has a Zero Tolerance policy for any form of sexual misconduct to include staff/contractor/or volunteer-on-offender or offender-on-offender sexual harassment, sexual assault, sexual abusive contact and consensual sex.” Section 421.01, page 3, this policy states that Three Lakes Valley Conservation Camp follows the Department’s Zero Tolerance policy for any form of sexual misconduct to include staff/contractor/or volunteer-on-offender or offender-on-offender sexual harassment, sexual assault, sexual abusive contact and consensual sex. Any staff member/contractor/volunteer who engages in, fails to report, or knowingly condones sexual harassment or sexual contact with or between offenders shall be subject to disciplinary action and may be subject to criminal prosecution. Three Lakes Valley Conservation Camp shall take a proactive approach regarding the prevention, detection, response and punishment of any type of sexual contact through education and training of staff, offenders, and the public.</p>

	<p>Administrative Regulation 421 defines sexual abuse and sexual harassment. The policy explains what behaviors are violation of the PREA policy. The zero-tolerance policy includes the statement that disciplinary action will be taken, including possible prosecution on any staff/volunteer or contractor who violates the PREA policy.</p> <p>NDOC's PREA Coordinator is Deborah Striplin. Ms. Striplin was assigned on January 1, 2019, as the PREA Coordinator for the Nevada Department of Corrections. During this PREA Audit, Ms. Striplin was readily available to assist the audit team and Three Lakes Valley Conservation Camp through the audit process. Prior to being appointed as the PREA Coordinator, Ms. Striplin assisted the Inspector General for the State of Nevada in developing, implementing, and overseeing the NDOC's efforts to comply with the PREA standards. During the interactions with Ms. Striplin, it is apparent that she is committed to ensuring that the State of Nevada is compliant with the PREA standards. She is actively involved with all of the facilities in Nevada, overseeing their PREA compliance efforts. The Director of Corrections has delegated Ms. Striplin the authority to implement agency wide policies, procedures and practices. She reports directly to the State Inspector General.</p> <p>Three Lakes Valley Conservation Camp's PREA Compliance Manager (PCM) is Harold Allen, Correctional Lieutenant. Lieutenant Allen has been assigned as the PREA Compliance Manager at Three Lakes Valley Conservation Camp for approximately two months. Lieutenant Allen reports directly to the Warden of the Southern Desert Correctional Center as they are on the same site and are the hiring authority for the Three lakes Valley Conservation Camp. Lieutenant Allen is the highest-ranking staff member posted at the Three lakes Valley Correctional Center.</p> <p>According to Lieutenant Allen, he feels that he has sufficient time to coordinate the facility's efforts to comply with PREA. The PREA Compliance Manager and his staff appear committed to insuring Three Lakes Valley Conservation Camp's commitment to preventing, detecting, responding to and reporting sexual abuse of offenders in their custody.</p>
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115.12	Contracting with other entities for the confinement of inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The last contract that Nevada Department of Corrections (NDOC) entered to house offenders was with CoreCivics to house 200 NDOC offenders in October 2017. In November 2020, all NDOC offenders were transferred out of the CoreCivics facility and returned to the State of Nevada. According to the PREA Coordinator, there are no future plans to enter any contracts with any other entity to house offenders for the State of Nevada.</p> <p>Further questions were asked to see if the NDOC uses contracted facilities to house offenders for substance abuse programs or "half way houses" for paroled offenders</p>

	<p>and the auditor was told that NDOC does not use outside contractors for these types of programs. The NDOC PREA Coordinator stated that she would be involved if a contract were to be initiated with an external entity for this function. She would ensure that language in the contract is consistent with the requirements of PREA.</p> <p>During the interview with the Agency Contract Administrator, he stated that if a new contract were to be negotiated, he would check to see if the company had any recent audits posted on line. He said he would look at their training history, their facility PREA history, and their PREA standard compliance. He stated that he would work with the contract negotiation team to make sure that the proper PREA compliance language was in the contract.</p>
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115.13	Supervision and monitoring
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Administrative Regulation 326, Posting of Shifts, requires that at least once a year the PREA Coordinator shall assess, determine, and document whether adjustments are needed to the staffing plan and or video monitoring system. This auditor was provided a signed copy of the Three Lakes Valley Conservation Camp Staffing Plan. According to the Staffing Plan, Nevada Department of Corrections' PREA Coordinator initiated a review and discussion of the staffing patterns for Three Lakes Valley Conservation Camp with the Director of Corrections.</p> <p>The staffing plan considers:</p> <ul style="list-style-type: none"> · Generally accepted detention and correctional practices; · Any Judicial findings of inadequacy (none); · Any findings of inadequacies from a federal investigation agency (none); · Any findings of inadequacies from an internal or external oversight body (none); · All components of the facilities physical plant; · The composition of the offender population; · The number and placement of supervisory staff; · Institutional programs occurring on a particular shift; · Any applicable state or local laws or regulations (none); · The prevalence of substantiated or unsubstantiated incidents of sexual abuse.

Three Lakes Valley Conservation Camp staff consists of 14 Correctional Officers, one Senior Correctional Officers, and one Correctional Lieutenant (Facility Manager).

Three Lakes Valley Conservation Camp also has one Correctional Caseworker Specialist II, one Correctional Caseworker Specialist I, one Retail Store Keeper II, one Part-time Mental Health Professional and one Maintenance Repair Specialist III. The minimum staffing for the facility is two officers. Overtime is hired to fill any needed vacancies.

Operational Procedure 326, Posting of Shifts/Overtime, defines two separate levels of staffing. Minimum Staffing is the number of staff required to for normal operation of the facility. There are no modifications to program during this staffing level.

Emergency Operations is when there is just enough staff to fill the minimum number of posts to maintain the security of the facility. Whenever a modification to program is made, due to lack of staff, an incident report is created in Nevada Offender Tracking Information System (NOTIS). According to a memorandum signed by the Facility Manager, Three Lakes Valley Conservation Camp has not had fewer staff then the minimum level during this audit period.

Three Lakes Valley Conservation Camp has two housing units, named Unit 2 and Unit 3. Each of the housing units contain four pods, named A, B, C & D. Each section has their own telephones, toilets and showers. Other buildings and offices on site contain a Psychologist Doctors office, State wide transportation, (These staff do not work for the Three Lakes Valley Conservation Camp, they are a statewide program, only currently housed on-site), Administrative Office, Gymnasium, Visiting, Offender Canteen, a Dining Hall & Culinary, Laundry, Education and Maintenance. At the back of the facility is the Nevada Department of Forestry.

During the interview with the PREA Compliance Manager, he explained how the staffing plan is established, adjusted and enforced. The staffing plan is approved by the Nevada Legislature as part of the budget process. The plan is based on best practices, and the American Correctional Association's and National Institute of Correction's staffing models. Each year the plan is reviewed to see if adjustments need to be made based on mission changes, PREA and/or other serious incidents, program changes, legal challenges or legislative changes. According to the 2023 staffing plan, there are no findings of inadequacies by judicial ruling, Federal Investigative Agencies, or internal or external oversight bodies. There are no state, or local laws that dictate staffing requirements. The staffing plan contains an analysis of the offender population by ethnicity and security threat group.

Operational Procedure 400.03, General Security Supervision, requires that supervisors make unannounced rounds to identify and deter staff sexual abuse and sexual harassment. The policy also prohibits staff from alerting other staff members that the supervisory rounds are occurring. When supervisors make these rounds, they are required to document them in the housing unit log book and post an entry in NOTIS.

The Pre-Audit materials contained NOTIS entries demonstrating compliance with this standard. During the tour of the facility, the auditors were informed that the staff in

the control station enter the unannounced PREA rounds in NOTIS for the supervisor. A review of the NOTIS entries indicates that supervisor's rounds are being documented.

Two supervisors were interviewed and they stated that they do not let staff know when they are visiting the facility. There are a minimum of two staff on duty at all times. During the night time hours, the two staff are in constant communication with each other. At any given time, both staff know where each other are. Currently, there are no supervisors on the Graveyard shift on-site which is 2100-0500 hours. Their immediate Supervisor is the Officer in Charge, who is the Correctional Lieutenant, next door, at the Southern Desert Correctional Center.

During the tour of the facility the following opposite gender viewing/ Isolation area concerns were noted and were worked on during the corrective action period of the audit report. All areas have been brought in compliance and need no further action.

During the on-site tour, the audit team noted that the camera system appeared to be working. After discussion, we found that the monitors to the facility's cameras were in a room that the Three Lakes Valley Conservation Camp staff no longer have access to due to a relocation and repurposing of offices. This creates unmonitored blind spots throughout the Camp.

On August 5, 2024, the Acting Associate Warden, and current PREA Compliance Manager, emailed me a memorandum explaining the new procedures and improvements with the camera and monitoring system, since our on-site PREA audit.

With the new cameras, monitors, work schedules, room access and additional security rounds, these updates bring the Camp into compliance with this Standard. No further action is required.

During document reviews, to include Housing Unit Logbooks, we found that the Senior Correctional Officer's office is in Unit 3 and the Correctional Lieutenant's office is in Unit 2. When supervisory rounds are being made, the supervisory staff should also review and document the areas where they don't directly work. The facility staff are going through procedures to fix this concern.

Additionally, document reviews indicated that there are no supervisory rounds being conducted on a consistent bases on the Graveyard shift, (2100-0500 hours) at the Three lakes Valley Conservation Camp. Facility staff are working with the Southern Desert Correctional Center, next door, to assist in mitigating this concern.

I received emails and documentation from the PCM on May 20, 2024 and July 14, 2024, that documented training had occurred. Included was a memorandum from the Associate Warden and monthly shift log report/photocopies of the physical logbooks.

Documentation was imported into the OAS supplemental folder on or before the 1st of each month June, July and August. Additionally, copies of the physical logbook

which included entries by all staff, ensure to highlight the supervisor's entries and date.

This documentation and information bring the process into compliance with the Standard and requires no further action.

During the on-site tour, the audit team noted that the Phycologist Doctors office door was let unsecured and unattended during the audit tour. Facility staff secured the door while on site and will go over training reviews to ensure all areas are secured when no in the direct sight of staff.

On May 17, 2024 I received an email from the PREA Compliance Manager that included the documented training that was conducted with all facility staff to ensure all areas are secured when staff are not directly present.

This documentation and information bring the process into compliance with the Standard and requires no further action.

During the on-site tour, the audit team noted that the mirror, which is mounted on a back wall, in the laundry room just needs to be readjusted to see blind/isolation areas. Facility staff began working on this.

On August 19, 2024, I received an email from the PREA Compliance Manager, that included the documented information and photographs showing that the mirror in the laundry has been adjusted and the views shown indicate this new location is able to eliminate the blind/isolation area.

This new location/viewing area brings this Standard into compliance and needs no further action.

During the on-site tour, the audit team noted that the former Education area's Offender restroom has solid door. This creates blind spot/isolation area. Facility staff are working with maintenance to address this concern.

On September 12 2024, I received an email from the PREA Compliance Manager, that included the documented information and photographs showing that the door on the offender's restroom, in the former Education area, has had a small window placed in that door. Photograph's indicate this new window is placed where staff can check the safety of the offender within the restroom but does not provide opposite gender viewing concerns.

This window, eliminates the blind/isolation area, and brings this Standard into compliance and needs no further action.

	<p>During the on-site tour, the audit team noted that the Main Kitchen area's Offender restroom has solid door. This creates blind spot/isolation area. Facility staff are working with maintenance to address this concern.</p> <p>On September 12 2024, I received an email from the PREA Compliance Manager, that included the documented information and photographs showing that the door on the offender's restroom, in the Main Kitchen area, has had a small window placed in that door.</p> <p>Photograph's indicate this new window is placed where staff can check the safety of the offender within the restroom but does not provide opposite gender viewing concerns.</p> <p>This window, eliminates the blind/isolation area, and brings this Standard into compliance and needs no further action.</p>
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115.14 Youthful inmates	
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Nevada Department of Corrections (NDOC) requires that any juvenile offender housed at an adult correctional facility shall be housed in a location out of sight, sound and physical contact of the adult offenders. The youthful offenders are not to be placed in isolation for this purpose.</p> <p>The Nevada Department of Corrections houses all offenders under the age of 18 at Lovelock Correctional Center. There were no juveniles housed at Three Lakes Valley Conservation Camp at the time of the audit.</p>

115.15 Limits to cross-gender viewing and searches	
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Operational Procedure 422, Searches and Seizure Procedures, page 3, section 422.03, states that the facility shall not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners. All cross-gender strip searches and cross-gender visual body cavity searches will be documented in NOTIS.</p> <p>According to the staff and offenders interviewed, female staff have not conducted any</p>

strip searches on male offenders at Three Lakes Valley Conservation Camp. Staff stated that they would only do a strip search of a cross gender offender if it was an extreme emergency. These staff knew that in the event that they had to strip search a cross gender offender, they would document it. A memorandum authored by the PREA Coordinator, states that there have not been any cross gender unclothed body searches conducted at Three Lakes Valley Conservation Camp in the past year.

Operational Procedure 422, Search and Seizure Standards, section 422.03 states that Three Lakes Valley Conservation Camp shall not permit cross-gender pat down searches of female offenders, absent exigent circumstances. Any cross-gender pat search of a female offender must be documented in NOTIS. According to the PREA Compliance Manager, there have not been any pat searches of female offenders by male staff during this audit period.

OP 422, Search and Seizure Standards, section 422.03, states the facility will enable offenders to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to the routine performance of their job duties. Offenders are required to change clothes in the restroom area. There are doors on the toilet stalls and curtains on all of the functioning showers. When asked, all of the offenders stated that they are allowed to toilet, dress and shower without staff of the opposite gender watching them.

If an offender is suspected of trafficking contraband in from the community, they may be subject to strip search. The strip searches are conducted in the staff office restroom, with the door closed. Only staff of the same gender will strip search an offender. The auditors did not see any cameras in the offender restrooms or where offenders may be strip searched.

Operational Procedure 422, section 422.03, Staff of the opposite gender are required to be announced each and every time when entering a housing unit. The staff member who is entering the housing unit is required to make this announcement and document. A review of NOTIS confirmed this documentation. During the offender interviews, every offender stated that female staff's presence is announced every time that they enter the housing unit. During the tour the announcements were always made in our presence. All staff stated that the announcements are routine and expected.

OP 422, Search and Seizure Standards, section 422.03, restricts staff from searching offenders for the sole purpose of determining their genital statues. Information on an offender's genital statues is to be obtained during routine conversation or a review of medical records. All of the staff interviewed stated that they do not search offenders to determine their genitalia statues. None of the offenders claimed to have been strip searched for this reason.

The training that is provided to custody staff by NDOC is very thorough and comprehensive on searching methods. The training power point demonstrates, to staff, how to properly conduct a pat down search of transgender and intersex offenders. All staff are required to demonstrate proper search technics to the

	<p>instructor prior to passing the class. The training is provided annually during the Defensive Tactics Class. A review of the training files showed that all of the custody staff have attended this training.</p> <p>During the on-site tour, the audit team noted that the Visiting area needs notification signs when Unclothed Body Searches were taking place to prevent Opposite Gender Viewing. Facility staff are working with maintenance to address this concern.</p> <p>On August 6, 2024, the PREA Compliance Manager, sent me an email that contained a signed memorandum and photographs of the new sign that indicate Unclothed Body Searches were being conducting. These signs will be posted in the area when the searches are being conducted and removed when the area is clear. The memorandum was placed in the Visiting staffs Post Orders and training was conducted with all staff who work the area.</p> <p>This new process brings this Standard into compliance and needs no further action.</p>
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<p>115.16</p>	<p>Inmates with disabilities and inmates who are limited English proficient</p>
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Administrative Regulation 421, Prison Rape Elimination Act, section 421.07, states that all offenders will be afforded PREA education, including offenders who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to offenders who have limited reading skills. The PREA resource manual requires that the facility utilize the necessary resources that are available to assist offenders who have disabilities to ensure those offenders have equal access to participate in or benefit from every aspect of the prevention, detection and response to sexual abuse and sexual harassment.</p> <p>Operational Procedure 421, Prison Rape Elimination Act, section 421.07, states that Three Lakes Valley Conservation Camp will provide the offender education in formats accessible to all offenders, including those offenders who are limited English proficient, deaf, visually impaired or otherwise disabled as well as to those who have limited reading skills. If it appears that an offender is unable to comprehend the information being provided, staff will utilize effective communication (e.g. using simple language, requesting feedback confirming comprehension) to convey the PREA information to the offender.</p> <p>The offenders receive the PREA information in the Prison Rape Elimination Act Education and Information Sheet when they first arrive at the facility. The PREA information sheets are available in both English and Spanish. All offenders are also</p>

	<p>required to watch a 15-minute video on NDOC’s PREA policy. The video and handout are available in both English, and Spanish. The video does have closed caption for the hearing impaired. The policy is also available in braille format if needed. Due to the nature of the forestry program, the braille format is rarely needed. Offenders are required to sign acknowledgement of receiving and understanding the information.</p> <p>The PREA information posters and the Rape Crisis Center posters, that were posted in numerous places within the camp, are in both English and Spanish.</p> <p>Administrative Regulation 658, Reasonable Accommodations, section 658.07, states that the ADA Coordinator, with the assistance on the Medical Department, will ensure that hearing and vision impaired offenders have access to auxiliary aids when required for effective communication in assessing and participating in programs and services, including PREA reporting and follow-up. Since all offenders arriving at Three Lakes Valley Conservation Camp are transferred from a different facility, their medical appliances are transferred with them. In the event that an offender needs a hearing or vision assistive device, the medical department from Southern Desert Correctional Center will be contacted and an appointment for an assessment will be made.</p> <p>NDOC has contracted with CTS Language Link to provide both spoken interpretation and written translation services. Information on how to access those services can be found in the Supervisor’s office, and the caseworker’s offices. The audit team was provided copies of the contract with CTS Language Link. At the time of the audit there were several offenders housed at Three Lakes Valley Conservation Camp that did not speak fluent English.</p> <p>NDOC PREA Manual states that staff shall not use and/or rely upon offender interpreters, offender readers, or other types of offender assistants. Three Lakes Valley Conservation Camp has staff that are certified interpreters. All of the staff knew the limit of utilizing an offender interpreter. A majority of the staff were aware of and knew how to use the language link.</p>
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115.17	Hiring and promotion decisions
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Nevada Department of Corrections Prison Rape Elimination Act Manual, page 4, mandates that the Department shall not hire or promote an individual to a position that may have contact with offenders who meets any of the three criteria listed in section 115.17 (a). NDOC requires that every applicant/volunteer/contractor who may have contact with an offender disclose the following information prior to entering into any NDOC facility:</p> <p>Have they engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution, or have they been convicted of engaging</p>

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 have they been civilly or administratively adjudicated to have engaged in the activity described in any part of this question.

Have they been adjudicated as having engaged in any type of offender Sexual Harassment, which includes as a staff member, volunteer, contractor, or as any type of service provider coming in contact with an offender in the facilities mentioned in question 1.

Answering affirmative to either of these questions can result in the denial of employment or, in the case of contractors and volunteers, denial of access into the facility. Providing false information is grounds for dismissal. Staff answer these questions during the initial interview process, and during any promotional interview. A review of the personnel and volunteer's files demonstrated compliance with this policy. Every file reviewed had a copy of these questions answered by the employee.

NDOC Administrative Regulation 300 requires that NDOC complete a background check before hiring or promoting any staff member. NDOC uses National Crime Information Center (NCIC) and the Nevada Department of Public Safety, Records, communications and Compliance Division to complete background clearances.

Sixteen employee's personnel files were reviewed. All sixteen of the personnel filed showed that a background check had been completed upon initial hiring or during the last promotion.

Human Resources must 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. During the interview with the head of personnel, she explained the hiring process and how back ground checks are conducted. She explained what her staff would do if they discovered that an employee was dishonest during the application and hiring process.

The Office of the Inspector General is required to do a biannual audit of random HR files for employees of the Department who were hired in the previous six months to ensure compliance with the required background check. According to Administrative Regulation 4521.04, NDOC conducts background checks on all current employees every three years. The month that the employee was hired determines which month the follow-up background check will be conducted. The last cycle was conducted in spring of 2023.

According to the tracking list provided with the pre-audit materials, all Three Lakes Valley Conservation Camp employees have had their background checks completed upon initial hiring and within the past five years (most within 2 years). All sixteen of the personnel files reviewed showed that a background check completed by the Office of the Inspector General within the past three years.

NDOC policy requires Human Resources to disclose any substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom the employee has applied for work.

	<p>Three Lakes Valley Conservation Camp did not have any occurrences of requests from other agencies since the last audit. The head of personnel stated that she would provide any information on prior sexual abuse or sexual harassment of an offender if she received an inquiry from another institution about a previous employee.</p> <p>NDOC Operational Procedure SS-0063, Background Clearance Application Procedure, requires that every contractor must have a background check completed prior to entering the facility. Additionally, AR 212 requires that the background check be completed every three years thereafter. According to this policy, a contractor is always denied if they have any type of sexual conviction.</p> <p>Three Lakes Valley Conservation Camp was able to provide the documents that all contractors and volunteers must fill out and sign prior to being allowed to have contact with offenders. Additionally, they are required to disclose any prior sexual misconduct convictions, administrative or civil actions, annually during their PREA training. Policy requires the volunteer or contractor to disclose any sexual misconduct. Failure to do so would result in restriction from grounds. Three examples of the volunteer background clearance were provided with the pre-audit materials.</p> <p>A list of all of the volunteers and contract staff approved to enter NDOC facilities was provided to this auditor. The seven contractor files and twelve volunteer files were reviewed by the audit team. The documents viewed by the audit team showed that all of the approved individuals have had their background cleared within the past three years and had signed a document disclosing any prior sexual misconduct in an institutional setting.</p>
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115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The NDOC PREA Manual requires that when the Department is designing or acquiring any new facility or planning any major expansion, acquisition or modification, that the Director, Deputy Director(s) and designee consider the effect of the design, acquisition, expansion or modification on the Department's ability to protect offenders from sexual abuse. Additionally, the manual requires the Department when installing new electronic monitoring systems, to consider how the technology will enhance the Department's ability to protect offenders from sexual abuse.</p> <p>According to the PREA Compliance Manager, Three Lakes Valley Conservation Camp has not had any upgrades completed since the last audit. The current video monitoring system appears to be operational but the Three Lakes Valley Conservation Camp staff do not have access to the monitors.</p>

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Administrative Regulation 421, states that NDOC office of the Inspector General, will investigate all allegations of staff on offender sexual abuse and sexual harassment and all offender-on-offender sexual abuse. Operational Procedure 421.12, Prison Rape Elimination Act, address the protocols for collection of evidence for use in an administrative proceedings and criminal prosecution. The policies include discovery, handling, delivery, retrieval, logging, storage, retention and destruction of all evidence.</p> <p>NDOC policies mirror the National Protocol for Sexual Assault Medical Forensic Examinations as set forth by the Office of Violence Against Women. Three Lakes Valley Conservation Camp uses a coordinated team approach to respond to reports of sexual assault. They provide access to a victim advocate, and provide immediate medical care through the local medical center. All allegations are investigated. Three Lakes Valley Conservation Camp utilizes a qualified SAFE/SANE nurse from the community to conduct medical exams and the process is handled, keeping the victims confidentiality in mind. The policy states that the offender will be provided medical and emotional support at no cost to the offender.</p> <p>Operational Procedure 421, Prison Rape Elimination Act, sections 421.12 and 421.13, provides staff with guidance on to transport an offender that is in need of a forensic exam. The procedure explains the evidence collection process, prior to the exam, the time frames for conducting the exam and the location to transport the offender victim to. The facility utilizes a check list (form B2093 and C2094) to make sure that all procedures are followed during the initial PREA response. These check lists cover evidence collection, crime scene preservation, medical referral and transfer to a medical exam. No offenders requested or accepted the request of a forensic exam during this audit period.</p> <p>NDOC and Three Lakes Valley Conservation Camp utilize a local hospital's Sexual Assault Nurse Examiner (SANE) to conduct the forensic exams. Currently NDOC has an agreement with University Medical Center in Las Vegas Nevada to conduct forensic exams. The audit team contacted the SAFE/SANE Coordinator with UMC and confirmed that they conduct the forensic exams for Three Lakes Valley Conservation Camp. If an offender is taken to UMC for a SAFE/SANE exam, they report to the emergency room. A SAFE/SANE nurse is called in to perform the exam. If there is no SAFE/SANE nurse available, the physician on duty will perform the exam. The person that the team spoke to stated that all of the certified SAFE/SANE nurses' training follows the National Protocol for Sexual Assault Medical Forensic Examinations as set forth by the Office of Violence Against Women.</p> <p>Three Lakes Valley Conservation Camp uses the Signs of Hope, formally called the Rape Crisis Center in Las Vegas for victim advocacy services.</p>

The audit team was provided a copy of the contract and Memorandum of Understanding. The victim advocate is still providing emotional support services and schedules ongoing emotional support telephonic meetings with offenders. According to the coordinator, they will accompany the offender, if requested, during the exam and investigation process under normal conditions. Signs of Hope has either staff or volunteers answering the rape hotline 24 hours a day, seven days a week. All of the volunteers are required to take a 50-hour training course on crisis intervention.

During the interviews with the investigators and the PREA Compliance Manager, they stated that offenders are offered a victim advocate in the event that they are going to have a forensic exam. The investigators also stated that they would let the victim advocate accompany the victim offender during the investigation interview if the offender requests it. No offenders requested to speak to a victim advocate during their interview during this audit period.

During the audit the PREA incident log was reviewed. There were seven cases, which could be both Administrative and Criminal, were reported during the audit period. Once the auditor is given the remainder of the investigation files, they will be reviewed for accuracy and completeness.

Between the dates of May 23, 2024 through August 2, 2024, the auditor received via email or uploaded directly into the Online Audit System, five additional investigation reports that had been completed. I reviewed each investigation and found that the concerns I had with the previous files have all been brought into compliance, either through clarifications, process changes or additional material. This update brings these Standards into compliance and need no further action.

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Administrative Regulation 421, Custodial Sexual Misconduct, Offender Sexual Offenses and Prison Rape Elimination Act, section 421.12, states “NDOC Office of the Inspector General will investigate all allegations of staff on offender sexual abuse, sexual harassment and offender on offender sexual abuse.” Additionally, the AR states that all substantiated criminal cases shall be referred to the applicable prosecutorial authority for review of prosecution. This information is on the NDOC website. AR 457, Investigations, states that all incidents shall be reported to the IG per the requirements of AR 332. The IG or designee shall be immediately notified of PREA related or serious incidents involving suspected criminal activity by offenders, staff, or outside parties; or serious violations of Department policy.</p> <p>Three Lakes Valley Conservation Camp Operational Procedure 421, Prison Rape</p>

Elimination Act, section 421.21, requires that all allegations of sexual abuse and sexual harassment will be investigated by the Inspector General. It is the responsibility of every employee, regardless of assignment or class, to report Sexual assault/abuse/harassment according with PREA Standard 115.22.

This auditor spoke with the Inspector General for the NDOC. He confirmed that it is the IG Office's responsibility to investigate PREA allegations in NDOC. The IG's office is notified via the Nevada Offender Tracking Information System (NOTIS), the electronic incident notice system used by NDOC. In emergency cases they are notified via telephone. Once the IG's office receives the notice, they will assign an investigator to the case. At the conclusion of the investigation, if it appears that a felony has taken place, the IG will refer the case to the Attorney General. The Nevada Department of Corrections Prison Rape Elimination Act Manual provides further direction on the Office of Inspector General's responsibility while conducting a criminal investigation.

I interviewed the Supervising Investigators for the Inspector General's Office regarding the investigation of PREA allegations. The investigator stated that they (the IG's Office) investigate all PREA cases that may result in prosecution. If the incident does not appear to be a criminal act, or involve a staff member, the case may be assigned to a supervisor at the institution for fact finding and investigation. One of the institutional investigators was also interviewed. He stated that, if an investigation is not criminal or involve staff, the investigation may be delegated to him through the Facility Manager's Office.

During the audit the PREA incident log was reviewed. There were seven cases, which could be both Administrative and Criminal, were reported during the audit period. Once the auditor is given the remainder of the investigation files, they will be reviewed for accuracy and completeness.

Between the dates of May 23, 2024 through August 2, 2024, the auditor received via email or uploaded directly into the Online Audit System, five additional investigation reports that had been completed. I reviewed each investigation and found that the concerns I had with the previous files have all been brought into compliance, either through clarifications, process changes or additional material. This update brings these Standards into compliance and need no further action.

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Administrative Regulation 360, Correctional Employee/Officer Basic Training Program, requires that all staff attend the 80-hour new employee training upon employment.

Included in this training is PREA training. The training syllabus was provided with the pre-audit materials. The training includes the following:

Zero Tolerance Policy

How to report, detect, prevent and respond to such allegations

Offender's right to be free from sexual abuse/harassment

Offender's right to be free from retaliation from reporting incidents

The dynamics of sexual abuse and harassment in confinement

The common reactions of sexual abuse and harassment victims

How to detect and respond to signs of threatened and actual abuse

How to avoid inappropriate relationships with offenders

How to communicate effectively and professionally with the LGBTI

How to comply with relevant laws related to mandatory reporting

The policy requires staff to be trained initially in PREA upon employment through the Correctional Employee/Officer Basic Pre-Service Training (PST). After the PST, the training is required every two years. In years which an employee does not receive PREA refresher training, the employee shall receive refresher information on current PREA policies.

Operational Procedure 421, Prison Rape Elimination Act, section 421.05, states that in a staff member transfers from an all-male facility, they will receive PREA training tailored specifically toward female offenders. Completed training will be documented on an On-The-Job training form and placed in the employee's training file.

In 2017, all current employees were to receive one-time training in cross gender/transgender pat down searches. Any employee that is hired after 2017 receives the training in the PST. Additionally, this training is provided in the annual Defensive Tactics Course. PREA training for 2022 and 2023 are computer-based training. This is a full PREA training course, including any relevant updates or changes to PREA policies. Participants must pass a quiz to receive credit for the course. A certificate of completion is printed at the completion of these courses.

Training for Three Lakes Valley Conservation Camp is conducted by NDOC Central Office. In an attempt to determine compliance with this standard, the audit team was provided with a printout of all staff that work at Three Lakes Valley Conservation Camp who have received the training for 2017 (pat-down search of transgender offenders), 2022 (current PREA training) and 2023, (refresher PREA training) from the Training Manager. The Training Manager was able to provide the lists of staff who completed the training and staff who had not completed the training. A review 16 of

	<p>the training files showed that all staff attend the required PREA training in 2022 and 2023. Computer generated certificates of completion were provided to the auditor.</p> <p>All of the staff interviewed were able to explain their role in the PREA process. Every staff knew the zero-tolerance policy. They knew that they were mandated to report any PREA allegation to their supervisor and to maintain confidentiality. The staff stated that they would make sure the alleged victim was safe and preserve any crime scene. The general view of the staff that were interviewed was that they would take any allegation serious and would respond accordingly.</p>
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115.32	Volunteer and contractor training
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Administrative Regulation 802, Community Volunteer Program, requires that all volunteers and contractual staff shall attend PREA training. The training covers the NDOC zero tolerance policy, and the volunteer/contractor’s responsibility under the NDOC’s sexual abuse and sexual harassment prevention, detection and response policies and procedures. An acknowledgment of receipt of training is then signed by the volunteer or contractual staff. This training is required prior to having contact with offenders and then every three years after that.</p> <p>Three Lakes Valley Conservation Camp has 12 volunteers on their Gatehouse list that actually come into the facility. Four examples of the zero tolerance acknowledgment forms were provided with the pre-audit materials. Documentation was provided showing that all 12 volunteers have received the PREA training. All of them signed acknowledging that they have received and understood the PREA training. All of the documents were signed by the volunteer within the past 24 months.</p> <p>I was given a list of all contractors that are currently able to provide services to the offender population. The facility provided proof that the contractors attended PREA training.</p> <p>During the interview with the contractor, they were able to explain the NDOC zero tolerance policy. All of them knew their responsibility to report sexual abuse/sexual harassment and they was able to adequately describe what they would do if an offender disclosed to them that they had been sexually abused or harassed.</p>

115.33	Inmate education
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p>

Administrative Regulation 511, Offender Orientation Program, requires that offenders receive information on PREA upon arrival. The offenders are provided an orientation handbook and a PREA Information and Education Sheet. This document explains the NDOC zero tolerance policy, the offender's rights under PREA and how to report a PREA incident. The Information and Education Sheet are available in both English and Spanish. AR 511 requires that when a literacy problem exists, staff will assist an offender in understanding the material. AR 421 states that offenders are shown the NDOC Comprehensive PREA video within 30 minutes of upon arrival. The offenders then sign a document acknowledging that they watched the video and understand the information. The information that the offender received the training is input into NOTIS.

The Offender Handbook contains the NDOC zero tolerance policy on sexual abuse and sexual harassment, that offenders have a right to be free from sexual abuse/harassment and how to report sexual abuse/harassment. The handbook provides the phone numbers and addresses to the State of Nevada's Inspector General's Office, the Signs of Hope main number, in Las Vegas and the New Mexico Department of Correction PREA Unit so that offenders can report to an outside government agency.

NDOC has a contract in place with CTS Language Link to provide interpretive services for offenders who do not understand English. This line was used during some interviews.

Three Lakes Valley Conservation Camp has the policy available in written format in both Spanish and English. The PREA and Orientation videos are available in both Spanish and English and includes closed caption for the hearing impaired. Three Lakes Valley Conservation Camp has access to the PREA policy in braille for offenders who are vision impaired. According to the intake staff who provide the offenders the education, if the offender is unable to comprehend the information, it is explained to them in detail.

The audit team requested that the intake staff show them through the intake process. When the offenders first arrive, they are shown a 15-minute video. This video explains the NDOC zero tolerance policy and how to report a PREA allegation. The offenders are then interviewed and asked the PREA screening questions addressed in standard 115.41. The offenders are also provided the offender handbook and PREA information and Education Sheet. The caseworker then interviews the offender and discusses the PREA information that was provided with the offender to make sure that the offender understands the information that they are received. The offender then signs the acknowledgment sheet at that time. If the offender arrives after normal business hours, they are provided the information the next day. The intake staff explained to the audit team what they do if an offender does not comprehend English. They provide the Spanish version of the video for them to watch and give them copies of PREA Information and Education Sheet in Spanish. If the offender does not speak either English or Spanish, they would use the Language Link.

According to the intake staff, they have only used the Language Link a few in the past as Spanish speaking interpreters were on-site at the time of the intake. At the time of the on-site portion of the audit, there were four offenders that was Limited English Proficient.

	<p>None of the offenders currently housed at Three Lakes Valley Conservation Camp were housed at Three Lakes Valley Conservation Camp prior to NDOC's implementation of the PREA policies.</p> <p>Twenty-two examples of the offender education acknowledgment forms were provided with the pre-audit materials. Documentation provided to this auditor, along with random reviews of 18 offender files, and offender interviews indicated that the offender education portion of PREA is well within the standard. A review of offender files revealed that copies of the signed acknowledgement form were in 18 of the 18 files reviewed. All of the offenders were provided the comprehensive PREA education on the day of arrival or the next day.</p> <p>Of the offenders 22 offenders interviewed, all of those stated that they remember receiving the PREA information upon arrival. All 22 offenders were familiar with the PREA policy and knew that sexual assault and harassment were a violation of the rules. Every one of the offenders that were interviewed knew at least three ways that they could report a PREA.</p> <p>All of the common areas had posters, in English and Spanish, explaining the NDOC PREA zero tolerance policy and how to report sexual abuse/sexual harassment visible to the offender population. Additionally, the posters with the zero-tolerance policy and the telephone numbers to report sexual abuse to an outside agency are painted on the walls near the offender telephones.</p>
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115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>NDOC utilizes investigators from the Inspector General's Office to conduct all PREA allegation investigations. The investigators are required to attend the same PREA training as all NDOC employees. Additionally, they are required to take the National Institute of Corrections course on Investigating Sexual Abuse in a Confined Setting. This course covers techniques for interviewing sexual abuse victims, compelled interview warnings, sexual abuse evidence collection and criteria and evidence required to substantiate a case for administrative or criminal prosecution.</p> <p>This auditor was provided a copy of the training syllabus and completion certificates of the investigators for the Inspector General's Office. The IG's Office has nineteen PREA trained investigators. The audit team was provided copies of all nineteen investigator's training certificates. Three Lakes Valley Conservation Camp has two supervisors that are used as local investigators to investigate non-criminal, non-staff PREA cases. Their training certificates, demonstrating completion of the NIC courses, were provided to the audit team for review.</p> <p>The audit team interviewed one investigator from Three Lakes Valley Conservation Camp and one Investigator from the IG's Office. During the interview with the</p>

	<p>investigators, they demonstrated knowledge on how to conduct a PREA investigation. This knowledge included what evidence to look for during an investigation, how to interview the alleged victim, suspect and potential witnesses. The investigators were able to explain how and when they would refer a case for prosecution. Both of the investigators interviewed knew how to conduct compelled interviews.</p>
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115.35 Specialized training: Medical and mental health care	
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>NDOC policy on medical training requires that all full and part time medical and mental health care practitioners who work regularly in the facility receive specialized PREA training.</p> <p>The NDOC PREA Manual states that all medical and mental health employees assigned in the Department will complete specialized training specifically in:</p> <ul style="list-style-type: none"> How to detect and assess signs of sexual abuse and sexual harassment How to preserve physical evidence of sexual harassment How to respond effectively and professionally to victims of sexual abuse and sexual harassment How and to whom to report allegations or suspicions of sexual abuse and sexual harassment <p>This training is provided by the National Institute of Corrections on-line training facility. A printed certificate documenting the completion of the class is to be placed in the employee’s supervisory file at the institution and within the Department’s employee training file. The two on-line classes that medical/mental health staff are required to take to fulfill this standard are “Medical Health Care for Sexual Assault Victims in a Confined Setting” and “Behavioral Health Care for Sexual Assault Victims in a Confined Setting”.</p> <p>All medical and mental health care practitioners are also required to receive the training mandated for employees in PREA standards 115.31 and 115.32, depending on their employment status.</p> <p>Administrative Regulation 360, Correctional Employee/Officer Basic Training Program, requires that all staff attend the 80-hour new employee training upon employment. Included in this training is PREA training. Medical Staff are not excluded from this requirement.</p> <p>Three Lakes Valley Conservation Camp does not have any mental health staff assigned and had a limited medical presence, to the facility. There are medical and mental health staff, which work at the Southern Desert Correctional Center who</p>

	regularly visit Three Lakes Valley Conservation Camp to provide routine medical and mental health services to the offender population. In the event of a medical or mental health emergency, the offender is transferred to the local hospital or a local NDOC facility.
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115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Three Lakes Valley Conservation Camp Operational Procedure 573, PREA Screening and Classification, section 573.01, states that a transfer screening should take place as soon as possible, but shall be completed within 72 hours of arrival at a new facility. Whenever possible, and consistent with the safety and security needs, offenders are not to be housed together in two-man cells prior to PREA screening. A case note (PREA-Intake Assessment) will be generated to document said action.</p> <p>The PREA Risk Assessment Tool (DOC 2097) utilized by NDOC has 10 questions to assess the offender's vulnerability toward victimization and 4 questions to assess his potential toward predatory behavior.</p> <p>The PREA Risk Assessment will be used for all screenings and assessments include the following factors:</p> <p>Possible Victim Factors:</p> <ul style="list-style-type: none"> Whether the offender has a mental, physical or developmental disability. The age of the offender. The physical build of the offender. Whether the offender has previously been incarcerated. Whether the offender's criminal history is exclusively nonviolent. Whether the offender has prior convictions for sex offenses. Whether the offender is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming. Whether the offender has previously experienced sexual victimization. The offender's own perception of vulnerability. A transgender and/or intersex offender's own views with respect to his/her safety shall be given serious consideration.

Possible Aggressor Factors:

History of institutional violent behavior.

Any history of sexual abuse.

History of convictions for violent offenses.

History of correctional facility sexual abuse, which may include violations contained in AR 707 that are of a sexual nature.

A corresponding alert in NOTIS will be entered on all known victims (PREA-High Risk of Sexual Victimization) and all known predators (PREA-High Risk of Sexual Abusiveness).

The audit team reviewed the intake process during the on-site tour. When an offender arrives at Three Lakes Valley Conservation Camp, a designated Correctional Casework Specialist interviews the offender in a confidential, secure office. The Counselor completes the objective screening assessment, with the input of the offender. A case note is entered in NOTIS to document that the assessment tool was completed and note if any alerts were added. All data will be entered into the Microsoft Access PREA tracking database. Once the assessment tool is completed, it will be placed in the I-file. If Three Lakes Valley Conservation Camp receives an offender from another NDOC facility after normal business hours, the offender is screened the next business day.

Policy requires that the offender is personally interviewed again within 30 days. If there are no additional concerns, a case note (PREA 30 Day Follow Up) is generated to reflect that there have been no changes to the PREA Intake Assessment. If, upon interview, additional information is received, a PREA Risk Assessment is completed. A corresponding Alert in NOTIS is entered on all known victims (PREA High Risk of Sexual Victimization) and all known predators (PREA High Risk of Sexual Abusiveness).

Offenders are reassessed at each 12-month regular review and a PREA Regular Review Assessment case note will be entered to document said action. Offenders will also be reassessed if; the offender requests it, a staff member refers an offender for reassessment, if additional information is received or if the offender is involved in an incident of sexual abuse. According to the Operational Procedure, Offenders cannot be disciplined for refusing to answer these questions. The PREA Compliance Manager and the caseworker, both stated that the offenders are not disciplined if they refuse to answer the screening questions.

The audit team reviewed 22 random offender files. All of the files included the initial screening and all but three contained the information of the 30-day follow-up screening. All three of the offenders had not yet been at Three Lakes Valley Conservation Camp for 30 days.

	<p>During interviews with a sample of the offender population, all 22 offenders interviewed remember going through the PREA screening process on the day of arrival. Of those same 22 offenders, all but two remember being asked questions regarding their sexual safety a second time within 30-days of arrival (most offenders stated they were seen again in about 10 days).</p> <p>Only limited staff have access to the files. The results of the risk assessment are not shared with any other offenders.</p>
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115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Administrative Regulation 573, Prison Rape Elimination Act Screening and Classification, section 573.03, states that staff shall use information from the risk assessment to make informed housing, bed, work, education and program assignments with the goal of keeping separate those offenders at high risk of being sexually victimized from those at high risk of being sexually abusive. Staff shall make individualized determinations about how to ensure the safety of each offender. Prior to initiating a bed move, the caseworker must check PREA Alerts for victimization and/or abusiveness. At no time will a known victim and a known aggressor be housed together in a two-man cell. A possible victim and a possible aggressor should not be housed together unless necessary. Non-victims and non-aggressors may be housed with any other category, subject to individual case factors.</p> <p>Three Lakes Valley Conservation Camp is a Nevada Department of Forestry work facility. The offenders housed here have jobs working with the Nevada Department of Forestry, in one capacity of another, or are working on the Camp site. The physical design of the facility is comprised of two housing units. Each housing unit has four pods. If the facility had any offenders classified as victim likely or aggressor likely, they would not be housed in the same unit.</p> <p>AR 494, evaluation, Placement, and Treatment of Transgender and/or Intersex Offenders, requires the Non-Conforming Gender Review Committee (NGRC) to determine where to house transgender offenders. The committee requires the input from medical doctors and Mental Health Clinicians. A complete medical and mental health history is required and any relevant information from the offender is considered. The NGRC convenes every quarter. Notes from the NGRC were provided with the pre-audit materials. The committee was attended by the NDOC Medical Director, Mental Health Director, the PREA Coordinator, and Deputy Director. The committee was chaired by the NDOC Director.</p> <p>All NDOC offenders' safety and program needs are reassessed every twelve months. Three Lakes Valley Conservation Camp OP 573, PREA Screening and Classification, section 573.01, states that Placement and programming assignments for each</p>

	<p>transgender or intersex offender will be reassessed at least twice each year to review any threats to safety experienced by the offender. These reassessments should be completed in conjunction with the offender’s regularly scheduled periodic/six-month review. Offenders will be personally interviewed by a Caseworker, a PREA Special Assessment will be completed in NOTIS, and a PREA Special Referral case note will be generated documenting that the assessment was completed. Policy requires that the view of the transgender or intersex offender toward their safety will be given serious consideration. There were no transgender or intersex offenders housed at Three Lakes Valley Conservation Camp during the time of the on-site audit.</p> <p>AR 573, section 573.02, requires that transgender and intersex offenders are given the opportunity to shower separately from the other offenders. The design of the showers at Three Lakes Valley Conservation Camp allows all offenders to shower separately from each other. There were no transgender offenders housed at Three Lakes Valley Conservation Camp during the time of this audit.</p> <p>NDOC does not house transgender, intersex, lesbian, gay or bisexual offenders in specific facilities. Three Lakes Valley Conservation Camp does not house transgender, intersex, homosexual or bi-sexual offenders in specific housing units. At the time of the on-site portion of the audit, there were no offenders identified as transgender, or intersex. There were three offenders that identified as gay or bisexual.</p>
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115.43	Protective Custody
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>NDOC does not allow offenders to be placed in involuntary segregated housing based solely on victimization concerns unless there are no other safe housing options. Administrative Regulation 573.04, states “Offenders at high risk for sexual victimization shall not be placed 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. If a facility cannot conduct such an assessment immediately, the facility may hold the offender in involuntary segregated housing no more than 24 hours. During the weekends or holidays the on-duty Associate Warden must be notified to make appropriate arrangements. If the offender voluntarily requests segregated housing, the offender will be seen by classification within 72 hours of segregation. Offenders placed in segregated housing for this purpose shall have access to programs, privileges, education and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education or work opportunities, the facility shall document:</p> <p>The opportunities that have been limited;</p>

	<p>The duration of the limitation; and</p> <p>The reasons for such limitations.</p> <p>The facility shall assign such offenders to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged and such assignment shall not ordinarily exceed a period of 30 days. If an involuntary segregated housing assignment is made the facility shall clearly document the basis for the facility’s concern for the offender’s safety and the reason why no alternative means of separation can be arranged. Every 30 days the facility shall afford each such offender a review to determine whether there is a continuing need for separation from the general population.”</p> <p>Three Lakes Valley Conservation Camp does not have Segregated Housing. Any offender that requests separation is transferred to an alternate facility. They would initially be transferred to the Southern Desert Correctional Center, on the same site. There have been no offenders transferred from Three Lakes Valley Conservation Camp due to victimization concerns during this audit period.</p>
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115.51	Inmate reporting
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Administrative Regulation 421, Prison Rape Elimination Act, section 421.09, states that offenders, visitors, offender family members, associates, and other community members can privately report sexual abuse and sexual harassment, retaliation by other offenders or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Such reporting can include, but not limited to:</p> <p>Verbal complaints to any Departmental employee</p> <p>Written complaints, which may be made through the following processes:</p> <p>Offender grievances</p> <p>Grievances alleging staff on offender sexual misconduct or offender on offender sexual abuse will be forwarded immediately to the PREA Compliance Manager and/or AW followed by a confidential report completed in NOTIS. A copy of the grievance will be forwarded to the PREA Coordinator and Office of the Inspector General for review and investigation.</p> <p>Offender kites, written notes or letters to staff or administrators,</p> <p>Any letter directed to the PREA coordinator or any member of the Inspector General’s Office.</p>

NDOC Family Services Office by phone or email at info@doc.nv.gov.

Writing the Nevada Attorney General's Office

Calling the internal PREA Hotline telephone number at 775-887-3152

Written documentation received by custody staff will be forwarded to the PREA compliance manager for retention after the allegation has been handled appropriately.

The NDOC has an agreement with the New Mexico Department of Corrections to accept PREA allegations from NDOC offenders, family or public. This gives the offenders a chance to report PREA to another law enforcement agency that is not associated with NDOC. The contact information for the PREA Coordinator at New Mexico Department of Corrections is provided to the offenders via the PREA Information and Education Sheet, the PREA offender handbook and it is posted on the walls in common areas around the facility. The letters and envelopes for New Mexico Department of Corrections is maintained in the caseworker's offices of each housing units. Unfortunately, most of the staff working the housing units did not know where this information was maintained.

Additionally, the IG's PREA hotline is available on the offender's phone. The offenders only need to enter a four-digit number, provided to the offender whenever the phone receiver is picked up, to prompt a direct line to the IG's PREA hotline to report an incident. The offenders are not required to give their name to make a report. The access to the PREA hotline was checked by the audit team. We were able to contact the number and leave a message without providing any identifying information about ourselves. Shortly after testing the phone line, we received confirmation from the IG's office that the message was received.

All of the offenders interviewed were aware of at least three different ways to report a PREA incident. Some of the examples that the offenders provided included, tell staff, call their family to have them report it, file a grievance, call the hot line or write a kite.

AR 421, requires that all staff report immediately any knowledge, suspicion, or information regarding any incidents of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. Staff shall privately report sexual abuse and sexual harassment incidents with their on-duty supervisor. Avenues of reporting can be either in person or by telephone. No other person shall be in the vicinity of hearing the reporting information. Staff is required to report known incidents involving both other staff and offenders. Staff is required to accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports. Information is disseminated on a need-to-know bases according to policy.

All of the staff interviewed during this audit stated that they would report a PREA allegation immediately no matter how they received the information.

	<p>The random staff that were interviewed said that they felt that they could report confidentially to their supervisor or the PREA Compliance Manager. Some of them said that they could also report it on the PREA hotline.</p> <p>NDOC does not house any offenders solely for civil immigration purposes.</p>
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115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Administrative Regulation 740, Offender Grievance Procedure, section 740.06, states that all grievances containing allegations of sexual abuse will be referred to the Inspector General's Office for investigation and they will be designated as "PARTIALLY GRANTED" indicating that it has been submitted for investigation by the Inspector General's Office. Operational Procedure 740, Offender Grievance Procedure, section 740.08, removes all time frame restrictions for the filing of a grievance when the grievance alleges sexual abuse.</p> <p>Operational Procedure 740, section 740.03, states that any grievance that alleges sexual assault by a staff member, the offender is not required to give the grievance to the staff member named in the grievance, nor is the offender required to attempt to resolve the issue with that staff member. AR 740 states that the grievance will not be forwarded to the staff member who is the subject of the complaint.</p> <p>Policy requires that all grievances alleging sexual abuse are forwarded to the Inspector General's (IG) Office. The IG's Office will render a decision of the outcome of the appeal within 90 days and initiate an investigation, if appropriate. In the event that more time is needed to resolve the grievance the IG's Office may ask for a 70-day extension. If an extension is needed, the IG's Office will notify the offender of the extension and the expected date of the reply. Upon the completion of the investigation the IG's Office will notify the offender of the results of the investigation. If the offender does not receive a response within the allotted time limits, the offender may consider this a denial.</p> <p>NDOC and Three Lakes Valley Conservation Camp's Operational Procedures do allow for third party reporting. Third party individuals could be a fellow offender, staff member, family member, attorney or an outside advocate. If a grievance is filed via third party, the offender is to be interviewed. The offender must confirm the allegation and agree to the administrative remedies. If the offender declines to have the request processed, it shall be documented in the tracking log and on NOTIS (Nevada Offender Tracking Information System).</p> <p>Operational Procedure 740, section 740.10, addresses the emergency grievance process. If an offender submits an emergency grievance, the Shift Supervisor will be notified immediately. The Shift Supervisor is to determine if the grievance constitutes</p>

an emergency. The highest-ranking officer on duty will respond to the grievance. At any time, an offender may file an Emergency Grievance for issues involving substantial risk of imminent sexual abuse. The person responding to the Emergency Grievance alleging substantial risk of imminent sexual abuse will separate the offender, speak to the offender, and give the offender a bed move if necessary to protect them. The grievance will be responded to on the same day it is received and the response to the will be documented in NOTIS. PREA Compliance Manager will ensure that the grievance has been referred for investigation.

An offender may not be disciplined for filing a grievance related to alleged sexual abuse unless the Department has demonstrated that the offender filed the grievance in bad faith.

The Grievance Coordinator for Three Lakes Valley Conservation Camp, who works out of the Southern Desert Correctional Center, explained how the grievance process works when there is an allegation of PREA. The offender gives the grievance to any staff member. The staff member gives the grievance to the Grievance Coordinator. If the grievance alleges PREA, the coordinator scans the grievance and forwards a copy to the PREA Compliance Manager and Facility Manager. The PREA Compliance Manager enters the information into NOTIS. If the IG’s office initiates an investigation, the grievance is returned to the offender with a “partially granted” response. At the conclusion of the investigation, if the offender is still not satisfied, they may submit the appeal directly to the IG’s Office as a second level appeal.

The Grievance Coordinator also stated that they do not require the offender to give the grievance to the staff member that the grievance is against nor do they require the offender to try to settle the grievance informally with that staff member.

According to a memorandum date January 10, 2024, authored by the Warden, Three Lakes Valley Conservation Camp has not received a grievance alleging PREA during this audit period. A review on the facilities grievance log did not reveal any PREA grievances being filed.

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Currently Three Lakes Valley Conservation Camp utilizes the Signs of Hope in Las Vegas for victim advocacy. The offenders receive the information via PREA Education and Information Sheet and the PREA handbook when they first arrive at the facility; additionally, there are posters on the walls of the housing units with this information and the phone number is posted on the wall by the telephones. Only 10 out of 13 of offenders interviewed knew about the type of services provided even though the information was visible everywhere.

	<p>Phone calls to the IG’s office are recorded by the IG’s office only. The recordings can only be shared for investigation or security reasons. Phone calls to the Signs of Hope are not recorded. Any mail to the Signs of Hope or IG’s office is treated as legal mail and not read by the staff. This information is included on the posters, the PREA Education and Information Sheet and the PREA handbook that the offenders receive upon arrival.</p> <p>Copies of the Memorandum of Understanding, the PREA Information and Education Sheet and Offender PREA handbook were provided to the auditors with the pre-audit materials.</p> <p>The Victim Advocate from the Signs of Hope was interviewed in February 2024. She stated that she had had limited contact with any staff and can’t remember any offenders, at Three Lakes Valley Conservation Camp. If she were to receive a request for emotional support from an offender at Three Lakes Valley Conservation Camp, she would provide the support and teach coping skills over the phone. If the offender needed direct contact, she would request a meeting with the offender through the PREA Compliance Manager. She further stated, that if an offender were reporting an incident to her, she would receive consent from the offender prior to reporting it as a third party.</p>
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115.54	Third-party reporting
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The Offender Handbook provided to the offenders as they arrive at Three Lakes Valley Conservation Camp explains that a PREA allegation can be reported to family or friends who can report on their behalf (third party reporting). This information is also on the posters in the housing units and in the visiting room. The Inspector General’s website contains this information and is available to the public. The visiting rules provided to visitors by Three Lakes Valley Conservation Camp contains the information on how to report a PREA on behalf of an offender.</p> <p>Operational Procedure 421, Custodial Sexual Misconduct, Offender Sexual Offenses (PREA), section 421.02, reiterates that offenders, family, friends and associates may file a PREA allegation on an offender’s behalf. Staff must report all allegations, even those received from third party. Administrative Regulation 421 states that offenders, visitors, offender family members, associates, and other community members can privately report sexual abuse and sexual harassment, retaliation by other offenders or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.</p> <p>During the interviews with the offenders, they all knew that they could have somebody else (friend, family member or another offender) report the allegation for them and that they could report a PREA allegation for another offender. Most of the</p>

	<p>offenders stated that this was one of the methods that they would use to report a PREA incident.</p> <p>Every staff member stated that they would accept a third party PREA report the same as a first party report when asked. All of the investigators that were interviewed stated that they would investigate a third-party report, just like any other allegation.</p>
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115.61	Staff and agency reporting duties
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	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Administrative Regulation 421, section 421.05, requires that all staff must report immediately any knowledge, suspicion, or information regarding any incidents of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. Staff is required to report known incidents involving both other staff and offenders. Policy also requires an employee to report any other employee's neglect or violation of responsibilities that may have contributed to an incident of sexual abuse, sexual harassment or retaliation. Three Lakes Valley Conservation Camp OP 421, Prison Rape Elimination Act, section 421.02, reiterates the employee's responsibility to report any knowledge or reasonable suspicion of sexual misconduct by another employee, contractor or volunteer to a supervisor or Inspector General.</p> <p>Medical Directive 117, Sexual Assaults, section 117.02, requires that medical staff report sexual assault or misconduct in accordance with AR 332, OP421, and PREA standards.</p> <p>Three Lakes Valley Conservation Camp Operational Procedure 421, Custodial Sexual Misconduct, Offender Sexual Offenses (PREA), section 421.10, states Three Lakes Valley Conservation Camp will accept reports from any and all sources to include but not limited to: offenders, visitors, offender family members, associates, and other community members. These individuals can privately report sexual abuse and sexual harassment, retaliation by other offenders or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.</p> <p>NDOC policy mandates that staff shall not reveal any information related to a sexual abuse report to anyone other than their immediate supervisor. All reports of sexual abuse to include offenders and staff are to be kept confidential. Section 421.17 states all case records associated with claims of staff sexual abuse, sexual harassment, offender sexual abuse 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. OP 421, section 421.05, states that apart from reporting to designated supervisors or officials, staff shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as</p>

	<p>specified in agency policy, to make treatment, investigation and other security and management decisions.</p> <p>NDOC policy requires that all allegations of sexual abuse and sexual harassment, including third party reports, be forwarded to the Inspector General’s Office for review and possible investigation. The IG’s Office then either assigns an investigator from the IG’s Office or refers the case back to the Facility Manager to handle the case administratively. The Facility Manager then assigns a local investigator to investigate the allegations.</p> <p>There were seven PREA allegations made during this audit period at Three Lakes Valley Conservation Camp.</p> <p>All of the staff interviewed knew their responsibility to report all allegations of sexual abuse and sexual harassment. They stated that they would report the information immediately to their supervisor or the PREA Compliance Manager. They also explained that they would not share any information about a PREA incident with any other staff except of those that have a need to know (such as an investigator). The Facility Manager stated that he makes sure that all PREA allegations are entered into the Nevada Offender Tracking Information System (NOTIS).</p> <p>According to the Inspector General, their office receives all NOTIS entries. They would receive any PREA allegation entered in the system and immediately initiate a response by contacting the facility to provide direction or obtain additional information.</p> <p>Institutional Nursing Procedure 200, Prison Rape Elimination Act, section II, A. 4, states that medical and mental health practitioners will obtain informed consent from offender prior to reporting information about prior sexual victimization that did not occur in an institutional setting, unless the offender is under 18. There are no mental health and limited medical staff assigned to Three Lakes Valley Conservation Camp.</p> <p>Due to the nature of the facility’s mission (Department of Forestry) Three Lakes Valley Conservation Camp does not house minors or vulnerable adults.</p>
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115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Administrative Regulation 421 states that if any NDOC employee becomes aware that an offender is subject to a substantial risk of imminent sexual abuse, they shall take immediate action to protect the offender. If the knowledge is obtained by receiving a verbal/written report, the employee will immediately notify the on-duty shift supervisor. If the knowledge is obtained by visual observance, the employee will initiate first responder duties in accordance with PREA guidelines. In the Sexual</p>

	<p>Assault Response procedure, it requires staff to separate the victim from the aggressor and keep the victim safe.</p> <p>Three Lakes Valley Conservation Camp Operational Procedure 421, section 421.12, Requires Three Lakes Valley Conservation Camp staff will ensure that immediate action is taken to protect an offender who is subject to substantial risk of imminent sexual abuse.</p> <p>If information that an offender is at substantial risk of imminent sexual abuse is received via emergency grievance, the grievance is to be taken to the supervisor. The supervisor shall take immediate action to protect the potential victim and document their actions in NOTIS. According to Operational Procedure 740, Offender Grievance Procedure, the supervisor will prepare a response to the grievance.</p> <p>During the interviews, staff explained what they would do if they received information that an offender was at imminent risk of being sexually assaulted. All of the staff responses were variations of what policy requires. In general, most staff responses were as follows:</p> <p>Based on how the information was received, they would interview the potential victim to ensure their safety. They would notify their supervisor and advise them of the situation. They would separate the potential victim from the potential predator while arrangements were made to rehouse either or both offenders or to transfer to alternate institutions. All of the actions taken would be documented in NOTIS. If the potential victim made a PREA allegation, the Inspector General’s Office would be notified.</p>
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115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Operational Procedure 421, Prison Rape Elimination Act, Section 421.20, states that upon receiving an allegation that an offender was sexually abused while confined at another institution/ facility, the PREA Compliance Manager or Facility Manager must be notified immediately. If the offender reports that this sexual abuse had been previously reported, a review of NOTIS will be conducted, and if necessary, the PREA Coordinator will be contacted, in an attempt to ascertain if there is documentation of the report. The Facility Manager will notify the head of the facility or appropriate office of the agency where the alleged abuse occurred as soon as possible but no later than 72 hours after receiving the allegation. The PREA Coordinator will also be notified.</p> <p>Upon receiving notification from another facility/agency claiming that a possible PREA incident had occurred at Three Lakes Valley Conservation Camp, the Facility Manager will refer the allegation to the Inspector General’s Office for investigation. The PREA</p>

	<p>Coordinator will ensure the allegation is investigated.</p> <p>The Facility Manager stated that he forwards any allegations that occurred at a different facility, made by offenders at Three Lakes Valley Conservation Camp, to his Warden that would then be sent to the Warden of that facility. He also notifies the Inspector General's Office of the allegation. He further stated that if he receives an allegation from another institution, he would make sure that it was investigated per policy.</p>
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115.64	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Three Lakes Valley Conservation Camp Operational Procedure 421, Prison Rape Elimination Act, section 421.12, provides a detailed process for first responders to follow upon learning of a sexual assault. The manual states that upon learning of an allegation that an offender was sexually abused, the first security staff member to respond to the report shall be required to:</p> <p>Separate the alleged victim and abuser. The victim and the suspect will not have any contact with each other either visually or audibly. The victim will be held in medical and the suspect will be placed in a holding cell;</p> <p>Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence;</p> <p>If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating;</p> <p>The supervisor will complete the check list, notify the Facility Manager, PREA Compliance Manager and the Inspector General's Office. The supervisor will complete all reports in NOTIS;</p> <p>If the alleged victim agrees to a forensic exam, they will be transferred to University Medical Center to be evaluated by the SAFE/SANE Nurse. Upon completion of the exam the offender will be transferred to the Southern Desert Correctional Center medical department;</p> <p>NDOC policy and training states that whomever receives the allegation from the offender is a first responder.</p> <p>During the interviews with staff, they were able to explain their role in the response to a sexual assault. The general response was that the staff would separate the alleged victim from the alleged suspect (if known). They would contact their supervisor and</p>

	<p>medical at the Southern Desert Correctional Center (if needed). They would secure the area and/or preserve the crime scene until the investigation team arrives to process the crime scene. They would discourage the alleged victim from washing their hands, change their clothes, shower, brush their teeth or use the toilet to preserve any possible evidence. They would prevent the alleged suspect from washing their hands, change their clothes, shower, brush their teeth or use the toilet.</p> <p>At no time do they let the alleged victim or the alleged suspect have communication with each other while awaiting transportation to the SAFE/SANE Nurse. The alleged victim and the alleged suspect are kept in separate rooms out of sight and ear shot from each other. They are transported in separate vehicles.</p>
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115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Operational Procedure 421.2, PREA Sexual Assault Response-Staff First Responder Duties, provides a detailed process for a coordinated response to a sexual assault.</p> <p>The OP requires upon learning of an allegation that an offender was sexually abused; the first security staff member to respond to the report shall be required to separate the alleged victim and abuser. The victim and suspected abuser shall not have any contact with one another either visually or audibly.</p> <p>The suspected abuser shall be secured in a temporary holding cell. Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.</p> <p>If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. The Custody Officer shall notify the Facility Manager immediately, who will then notify the Inspector General’s Office as soon as practical. The Custody Officer will complete a detailed NOTIS entry and the Facility Manager will complete an Incident Report for the Deputy Director.</p> <p>Custody staff shall collect and book into evidence all clothing from the offender victim. The offender will wear an orange jumpsuit to the forensic examination. If the offender victim agrees to a forensic exam, transportation to the contracted provider to be evaluated by the SAFE/SANE nurse shall be arranged. The offender victim shall be transported to Southern Desert Correctional Center for a follow-up medical exam.</p> <p>Staff are to secure the incident area and treat it as a crime scene until released by the Deputy Director, Inspector General or designee.</p> <p>The Facility Manager will interview the victim, if possible, to get a preliminary statement. The Investigator from the Inspector General Office will report to the facility and process the crime scene. The medical and Mental Health Staff at</p>

	<p>Southern Desert Correctional Center will conduct all follow-up medical and mental health requirements.</p> <p>Each staff member that was interviewed knew their role when responding to a sexual assault. Three Lakes Valley Conservation Camp has had seven PREA allegations reported during this audit period.</p>
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115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>According to the State of Nevada PREA Coordinator, the contract is in effect from July 2023 through June 2025. Within the 119-page contract, several items indicate compliance with this Standard:</p> <p>8.11.2 The Employer has the right to reassign employees to post assignments as required due to operational need and cross-training.</p> <p>8.23.3 The Employer may temporarily change an employees duty assignment to another work area and/or shift for 5 consecutive months or less. The decision of the Employer to implement a short-term change in duty assignment shall be final and may not be grieved.</p> <p>11.1.1 The Employer has the right to place an employee on paid Administrative Leave.</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Administrative Regulation 421, Prison Rape Elimination Act, Section 421.13, states that no staff member or offender who reports sexual abuse or sexual harassment or cooperates with asexual abuse or sexual harassment investigation will be subjected to any form of retaliation from other staff members or offenders of the Department.</p> <p>Operational Procedure 421, Prison Rape Elimination Act, section 421.25, requires the PCM to monitor and track all offenders and staff who reported the sexual abuse, or cooperate with an investigation, from retaliation from both staff and offenders. The monitoring will be conducted for at least 90 days.</p> <p>One of the Caseworkers or the facility Manager is responsible to meet with the</p>

	<p>offender who is being monitored at least every 30 days for a total of 90 day. The caseworker will review documents such as housing assignments, job assignments and disciplinary reports to determine if retaliation is occurring. Once per month, the Caseworker completes a NOTIS Chrono entry for each offender who has been tracked for protection purposes.</p> <p>If any facility staff member learns of or receives information that a person who cooperated with an investigation, including an offender or staff reporter, has expressed a fear of retaliation, the Inspector General’s Office will be immediately notified. The matter will be immediately reviewed by PREA management staff of the Inspector General’s Office and contact made with the person by the assigned staff member of the IG’s Office. Appropriate measures will be taken by the assigned investigator, including, follow up with the person who expressed the fear and if applicable referral to an outside law enforcement body or advocacy group.</p> <p>Three Lakes Valley Conservation Camp has had seven PREA allegations reported during this audit cycle. Additionally, there have not been any offenders transferred to Three Lakes Valley Conservation Camp, from other facilities, which were currently being monitored for retaliation.</p>
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115.68	Post-allegation protective custody
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Operational Procedure 573, PREA Screening and Classification, section 573.03, states that offenders who have been a victim of sexual assault shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the offender in involuntary segregated housing for less than 24 hours while completing the assessment.</p> <p>Administrative Regulation 573.04, states “Any use of Segregated Housing to protect an offender who is alleged to have suffered sexual abuse shall be subject to the requirements of standard 115.43.”</p> <p>Three Lakes Valley Conservation Camp does not have segregated housing for the purpose of Protective Segregation. If an offender requires Protective Segregation, that offender will be temporarily housed in a secure cell until transportation and reclassification to another facility can be completed. Male offenders are transferred to Southern Desert Correctional Center and female offenders are transferred to Florence McClure Women’s Correctional Center. This should take place within 24 hours of separation from the population at Three Lakes Valley Conservation Camp.</p>

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Administrative Regulation 421, Custodial Sexual Misconduct, Offender Sexual Offenses and Prison Rape Elimination Act, mandates that the NDOC, Office of the Inspector General (IG), will investigate all allegations of staff on offender sexual abuse, sexual harassment and offender on offender sexual abuse within the NDOC. This includes third party and anonymous reporting of a PREA allegation.</p> <p>Investigators are assigned to cases via the IG's Office as soon as a complaint is received. The investigators are trained in how to do criminal and sexual assault investigations. This includes a thorough, complete and objective investigation.</p> <p>Investigators assigned to investigate allegations of sexual abuse or sexual assault shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. If the case is determined to be none criminal, and does not involve staff, the IG's Office may assign it to an investigator from the facility.</p> <p>The IG's Office has a team of 19 criminal investigators trained in investigating sexual assault cases. The training includes conducting sexual assault investigations in a confinement setting, interviewing victims of sexual assault, proper use of Maranda and Garrity warnings, sexual abuse evidence collection, and preparing a case for referral for prosecution. Reviewing the training record confirmed that the investigation team had all received the proper training. Local investigators who work at the institution, not assigned to the IG's Office, receive the same training. These local investigators typically investigate offender on offender sexual harassment or other non-criminal cases that do not involve staff.</p> <p>The investigators that were interviewed for this audit were able to explain the investigation process. When they are first assigned to a case, they make sure that the alleged victim is safe and receiving medical attention, including a forensic exam if needed. They report to the crime scene and collect any evidence. They also collect the evidence from the forensic exam. They review staff reports and interview the victim. They then interview the suspect (if known) and any witnesses. The investigators stated that they also review any video tapes, phone calls, documents or other relevant evidence. Once all of the interviews are completed and evidence has been reviewed, they write a report stating the facts of the case. The investigator then submits the case to the Attorney General's for possible prosecution. The evidentiary standard to substantiate a case is preponderance of evidence.</p> <p>Policy requires that all substantiated criminal cases shall be referred to the applicable prosecutorial authority for review of prosecution. This is done by the Attorney General's Office.</p> <p>During interviews and discussion with investigative staff, each of them stated that the creditability of the individual being interviewed is not based on their status as an employee or offender, it is based on an individual bases. NDOC policy forbids the use</p>

	<p>of any form of lie detector test when interviewing the victim. Prior to conducting a compelled interview, the investigator will consult with the Attorney General’s Office for advice and direction.</p> <p>According to the IG, all completed investigations are retained in their office for at least five years after the alleged abuser is no longer in the control of NDOC or separated from state service.</p> <p>Policy states that the departure of the alleged abuser or victim from the employment of the Department or control of the institution/facility shall not provide a basis for terminating an investigation. Both investigators that were interviewed stated that they would continue with the case, even if the victim or suspect was released to the community or, in the case of an employee, the suspect resigns from the Department.</p> <p>During the audit the PREA incident log was reviewed. There were seven cases, which could be both Administrative and Criminal, were reported during the audit period. Once the auditor is given the remainder of the investigation files, they will be reviewed for accuracy and completeness.</p> <p>Between the dates of May 23, 2024 through August 2, 2024, the auditor received via email or uploaded directly into the Online Audit System, five additional investigation reports that had been completed. I reviewed each investigation and found that the concerns I had with the previous files have all been brought into compliance, either through clarifications, process changes or additional material.</p> <p>This update brings these Standards into compliance and need no further action</p>
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115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The NDOC PREA Manual states that the Department shall impose no standard higher than a preponderance of the evidence in determining whether an allegation(s) of sexual abuse is substantiated.</p> <p>During the interviews with the investigators, they knew what level of evidence was required to substantiate a case. The Facility Manager was also aware of these criteria. All three expressed that preponderance of evidence means that the incident was more likely to have happened than not to have happened.</p>

	<p>During the audit the PREA incident log was reviewed. There were seven cases, which could be both Administrative and Criminal, were reported during the audit period. Once the auditor is given the remainder of the investigation files, they will be reviewed for accuracy and completeness.</p> <p>Between the dates of May 23, 2024 through August 2, 2024, the auditor received via email or uploaded directly into the Online Audit System, five additional investigation reports that had been completed. I reviewed each investigation and found that the concerns I had with the previous files have all been brought into compliance, either through clarifications, process changes or additional material.</p> <p>This update brings these Standards into compliance and need no further action</p> <p>.</p>
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115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Administrative Regulation 421, Custodial Sexual Misconduct Offenders Sexual Offences and Prison Rape Elimination Act, requires that, at the conclusion of an investigation, the offender be informed on whether the allegation has been substantiated, unsubstantiated or unfounded. Additionally, if the allegation is against a staff member, the department will inform the offender when the staff member no longer works in the unit, when the staff member no longer works at the facility, if the staff member is indicted on charges related to sexual abuse within the facility or if the staff member is convicted of a charge related to sexual abuse within the facility. If the allegation is against another offender, the departmental policy requires the victim be notified if the perpetrator has been indicted or convicted on a charge related to sexual abuse. The NDOC PREA Manual requires that staff will notify the offender and enter a case note within the NOTIS system indicating that the offender had been notified.</p> <p>Operational Procedure 421, Prison Rape Elimination Act, section 421.27, the caseworker is responsible to notify the offender of the outcome of the investigation. The caseworker is provided a form DOC 2095, Notification of Investigation/Inquiry Resolution, by the PREA Compliance Manager. The offender is required to sign the notification document which is then forwarded to the PREA Compliance Manager, who ensures that the document is placed in NOTIS.</p> <p>Following an offender's allegation that a staff member committed sexual abuse against the offender, and the allegation was shown to be substantiated or unsubstantiated, the NDOC Offender PREA Notification of Investigation/Inquiry Resolution (DOC 2095) will also be utilized to notify the offender that the staff member is no longer posted within the offender's unit; the staff member is no longer</p>

	<p>employed at the facility; the staff member has been indicted on a charge related to sexual abuse within the Department; or the Department learns that the staff member has been convicted on a charge related to sexual abuse within the Department. The NDOC Offender PREA Notification of Investigation/Inquiry Resolution (DOC 2095) will also be utilized to make notifications following an offender’s allegation of sexual abuse by another offender to advise that the alleged abuser has been indicated on a charge related to sexual abuse within the Department or that the alleged abuser has been convicted of a charge related to sexual abuse within the Department.</p> <p>The Facility Manager explained the process he would follow when notifying an offender that the investigation is closed. Either the Facility Manager or one of the two Correctional Counselors would bring the offender into their office and inform them of the conclusion of the investigation. If the case was substantiated or unsubstantiated, they would inform the offender of the work statuses of the employee (if staff-on-offender) and the statuses of the case with the Attorney General. The conversation would be documented in NOTIS.</p> <p>Three Lakes Valley Conservation Camp had one offender housed who have made a PREA allegation in this past PREA audit cycle.</p> <p>During the audit the PREA incident log was reviewed. There were seven cases, which could be both Administrative and Criminal, were reported during the audit period. Once the auditor is given the remainder of the investigation files, they will be reviewed for accuracy and completeness.</p> <p>Between the dates of May 23, 2024 through August 2, 2024, the auditor received via email or uploaded directly into the Online Audit System, five additional investigation reports that had been completed. I reviewed each investigation and found that the concerns I had with the previous files have all been brought into compliance, either through clarifications, process changes or additional material.</p> <p>This update brings these Standards into compliance and need no further action</p>
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115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The State of Nevada defines sexual abuse of a prisoner as a class D Felony. Administrative Regulation 421, Custodial Sexual Misconduct, Offender Sexual Offenses and Prison Rape Elimination Act, section 421.14, states that NDOC staff shall be subject to disciplinary sanctions up to and including termination for violating Departmental sexual abuse or sexual harassment policies. All terminations for violations of Departmental sexual abuse or sexual harassment policies, or</p>

	<p>resignations by staff that would have been terminated if not for their resignation, shall be reported to law enforcement agencies and to any relevant licensing bodies, by the Inspector General’s office.</p> <p>Administrative Regulation 339, Code of Conduct, defined sexual abuse as a Class 5 disciplinary offence for employees. The Administrative Regulation requires that all Class 5 disciplinary actions result in termination, even for the first offence.</p> <p>Three Lakes Valley Conservation Camp OP 421, Prison Rape Elimination Act, section 421.22, states that Three Lakes Valley Conservation Camp staff shall be subject to disciplinary sanctions up to and including termination for violating Departmental sexual abuse or sexual harassment policies. All terminations for violations of Departmental sexual abuse or sexual harassment policies, or resignations by staff that would have been terminated if not for their resignation, shall be reported to law enforcement agencies and to any relevant licensing bodies, by the Inspector General’s office.</p> <p>During the interview with the Facility Manager, he stated that it is the expectation that staff be terminated if they sexually assault an offender, even if the offender appears to give consent. There were two sexual abuse and two sexual harassment allegations against NDOC employees at Three Lakes Valley Conservation Camp during this audit period.</p>
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115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Administrative Regulation 421, Custodial Sexual Misconduct, Offender Sexual Offenses and Prison Rape Elimination Act, section 421.15, states that any contractor or volunteer who engages in an activity that could be interpreted as sexual abuse shall be prohibited from contact with offenders and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. The institution/facility shall take appropriate remedial measures, and shall consider whether to prohibit further contact with offenders, in the case of any other violation of Departmental sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p>Three Lakes Valley Conservation Camp OP 421, Prison Rape elimination Act, section 421.23, requires that any contractor or volunteer at Three Lakes Valley Conservation Camp who engages in sexual abuse shall be prohibited contact with offenders and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.</p> <p>The Facility Manager stated that he would restrict a volunteer or contractor from grounds (gate stop) if they sexually assaulted or harassed an offender. Additionally,</p>

	<p>the volunteer or contractor would be removed from the clearance list and no longer allowed in any NDOC facility.</p> <p>Three Lakes Valley Conservation Camp did not have any allegations filed against any volunteers or contractors during this audit period.</p>
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115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Administrative Regulation 421, Custodial Sexual Misconduct, Offender Sexual Offenses and Prison Rape Elimination Act, section 421.16, addresses the discipline process for offenders that are charged with sexual abuse/harassment of another offender. The policy states that offenders shall be subject to disciplinary sanctions pursuant to Administrative Regulation 707, Offender Disciplinary Process, following a finding that the offender engaged in offender-on-offender sexual abuse, sexual harassment or consensual sexual activity. Offenders shall be subject to administrative disciplinary sanctions. Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the offender’s disciplinary history, and the sanctions imposed for comparable offenses by other offenders with similar histories. The disciplinary process shall consider whether an offender’s mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.</p> <p>According to Operational Procedure 421, Prison Rape Elimination Act, section 421.24, the agency may discipline an offender for sexual contact with staff only upon a finding that the staff member did not consent to such contact. For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation. Three Lakes Valley Conservation Camp prohibits all sexual activity between offenders and may discipline offenders for such activity. The Hearing Officer may not, however, deem such activity to constitute sexual abuse if he/she determines that the activity is not coerced.</p> <p>During the interview with the Facility Manager, he stated that the offender disciplinary process is an objective process that takes all factors into account when determining guilt or innocence of an offender. Additionally, any penalty administered as a result of a guilty finding is within established policy. All factors, including the offender’s mental health concerns are considered during the disciplinary process.</p> <p>Three Lakes Valley Conservation Camp did not have any substantiated allegations of offender-on-offender sexual abuse/harassment during this audit period.</p>

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	<p data-bbox="256 264 544 297">Auditor Discussion</p> <p data-bbox="256 338 1469 461">Medical INP 200, Health Care Services, section II, address how NDOC will provide medical and mental health treatment to an offender who discloses prior victimization or predatory sexual abuse.</p> <p data-bbox="256 495 1453 824">The policy reads “All offenders will receive screenings upon initial intake (reception) and upon arrival at each institution the offender may be transferred to during his or her incarceration. The Offender will be asked if he has experienced prior sexual abuse, whether it occurred in an institutional setting, jail, or in the community. If the offender answers yes, staff will ensure that the offender is offered a follow-up meeting with a medical or mental health practitioner within "14 days" of the intake screening. A specialized binder will be located and maintained in the medical and mental health areas to identify the offenders in need of this follow-up.</p> <p data-bbox="256 857 1485 1104">Any information obtained from the offender related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State or local law.</p> <p data-bbox="256 1137 1469 1261">Medical and mental health practitioners shall obtain informed consent from offenders before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the offender is under the age of 18.</p> <p data-bbox="256 1294 1469 1709">Three Lakes Valley Conservation Camp does not have any mental health staff and limited medical services. There are Medical and Mental Health staff from the Southern Desert Correctional Center, which is on the same site, who conduct regular weekly visits at the facility. If an offender discloses that they were a victim of a prior sexual assault, the offender is offered a mental health consolation. If the offender accepts the Mental Health consultation, they are given an appointment at the Southern Desert Correctional Center. Three offenders at Three Lakes Valley Conservation Camp disclosed prior victimization upon arrival. Documentation signed by the offenders showed that all three were offered Mental Health, however they all declined.</p>

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	<p>NDOC Departmental Policy, Medical INP 200, Health Care Services, states that all offender victims of sexual abuse will receive timely unimpeded access to emergency medical/mental health treatment which will be determined by the health practitioner's professional judgment.</p> <p>When an incident is of an Emergent Nature, medical staff will:</p> <p>Perform a cursory, visual exam for any signs of injury, without manipulating any of the victims' body parts.</p> <p>Injuries will be documented by camera and utilizing NDOC Form 2514 (Unusual Occurrence).</p> <p>Victims will be offered immediate medical attention for any injuries that require treatment.</p> <p>If SANE exam is requested, treatment can be briefly deferred if it appears it will affect evidence, and the injuries are not life threatening.</p> <p>Medical staff, if available, may assist in the collection of evidence, except for obtaining specimens.</p> <p>When an incident is of an Emergent Nature, Mental Health staff will:</p> <p>During normal working hours, mental health staff will provide an immediate consultation with the victim if requested.</p> <p>After hours, in the absence of mental health personnel, medical staff can provide basic counseling and support until the victim can be seen by mental health personnel.</p> <p>Offenders can be sent to any hospital in the Hometown Health PPO Network that NDOC is a member of. All of the hospitals in this network have emergency rooms. Salem Health is their closest hospital.</p> <p>All services provided for the above related treatments, shall be free of charge regardless whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>Three Lakes Valley Conservation Camp has had 7 PREA allegations during this audit period.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	<p>NDOC policy requires that offenders who have been victims of sexual abuse receive medical and mental health treatment as prescribed by a physician. Medical INP 200, PREA, requires that the follow-up treatment provided will be consistent with the community standard level of care. Sexual abuse victims will be offered tests for sexually transmitted infections as deemed medically appropriate. Female offenders will be offered pregnancy tests and provided information about available pregnancy services. Mental health will attempt to conduct mental health evaluations of all known offender-on-offender abusers within 60 days of learning of the known abuse.</p> <p>Three Lakes Valley Conservation Camp does not have any mental health services on site and limited medical services. Upon return from the SAFE/SANE exam, the offender would first be seen by NDOC Medical Staff at Southern Desert Correctional Center before returning to Three Lakes Valley Conservation Camp.</p> <p>Three Lakes Valley Conservation Camp has had 7 PREA allegations during this audit period.</p> <p>According to NDOC policy all services provided for the above related treatments, shall be free of charge regardless of whether or not the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>Policy requires that the facility attempt to conduct a mental health evaluation on all offender-on-offender abusers within 60 days of learning of such abuse history.</p>
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115.86 Sexual abuse incident reviews	
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Operational Procedure 421, Prison Rape Elimination Act, section 421.26, states that at the conclusion of every investigation into an allegation of sexual abuse which was determined not to be unfounded, a Sexual Abuse Incident Review (SAIR) will be done. The review will normally be done within 30 days of the conclusion of the investigation, including any administrative and criminal, and will include upper-level management officials such as the Facility Manager/Correctional Lieutenant from the facility and include input from line supervisors, investigators and medical or mental health clinicians.</p> <p>The SAIR will review each sexual abuse incident to determine if:</p> <ul style="list-style-type: none"> Policy or practice needs to be changed or modified; The incident was motivated by race, ethnicity, gender identity or gang affiliation; If physical barrier in the area enabled the abuse; If staffing levels were appropriate and adequate;

	<p>Or if monitoring technology should be deployed or augmented.</p> <p>The results of the discussion will be documented. At the conclusion of the SAIR, the Facility Manager is responsible to implement any recommendations.</p>
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115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The NDOC PREA handbook requires that the Inspector General (IG), PREA Management Team (PMT), is responsible to collect accurate, uniform data for every allegation of sexual abuse at every institution and facility using a standardized instrument and set of definitions. The incident-based sexual abuse data shall be aggregated, at a minimum, annually. The data shall include all of the data necessary to answer all questions from the most recent version of the Survey of Sexual Victimization (SSV-2) conducted by the Department of Justice. The IG PMT shall maintain, review, and collect data as needed from all incident-based documents including reports, investigation files and sexual abuse reviews. The PREA Compliance Manager maintains a record of all reports of sexual abuse at the facility.</p> <p>Although the PREA Coordinator was not present during this audit, during numerous telephone conversations and emails, she explained her agencies role in collecting, reviewing and maintaining the data. A review of the documents provided demonstrated compliance with this standard. The Inspector General’s PREA Unit receives all of the PREA incident reports within the NDOC via the Nevada Offender Tracking Information System (NOTIS). This allows for the NDOC to ensure that all reports are consistent. The information provided to the PREA Coordinator is sufficient to complete the Department of Justice’ Survey of Sexual Violence form. Each Prison within the NDOC uses the same set of definitions when documenting sexual assault and sexual harassment within the corrections system.</p>

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The NDOC PREA Manual requires that the Director, or designee, Deputy Director of Operations, and the Inspector General’s PREA Coordinator, review the data in order to</p>

	<p>assess and improve, if necessary, the effectiveness of its sexual abuse prevention, detection and response policies practices and training. This review includes identifying problem areas, taking corrective action on an ongoing basis and preparing an annual report of its findings and corrective actions for each facility and the department where offenders may be present.</p> <p>The report shall include a comparison of the current year’s data and corrective action with those from prior years and shall provide an assessment of the department’s progress in addressing sexual abuse. The Department’s report must be approved by the Director and made readily available to the public through the Department’s public website. Prior to placing any reports on the Department’s website, all personal information of the victims and subjects are redacted.</p> <p>The 2021 and 2022 reports were reviewed by this auditor. The report contained the PREA data on each of the NDOC facilities, identifying problem areas, any corrective action taken and the effectiveness of the sexual abuse prevention program. The report did not contain any confidential information such as victim’s information. The 2009 through 2022 reports are posted on the NDOC, Inspector General’s website. The web site is doc.nv.gov. Click on “PREA Management Division” and then select “PREA Incidents and Annual Reports.”</p>
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115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>All of the PREA data is maintained in the Inspector General’s Office. According to policy the data is maintained 10 years. The aggregated data is maintained on the NDOC website. There are no personal identifiers included in the information posted.</p> <p>According to the PREA Coordinator, they maintain the documents in their headquarters for over ten years. A review of the data available to the public, there were no personal identifier included in the information.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The NDOC website contains the results of all of the PREA audits conducted since 2013. A review of these audits appears to show that all of the facilities operated by NDOC were audited in a three-year period starting in August 2013. The number of audits conducted was approximately one third of their facilities each of the three</p>

	<p>years. This is the second year of this audit cycle.</p> <p>During this audit, the auditor had access to, and toured, the entire facility. This auditor had access to every offender, staff member, volunteer and contractor that this auditor requested to interview. The interviews were all conducted in the privacy of a staff office either in person or telephonically. Each document that was requested was received, including sensitive documents, such as investigation reports, personnel information, medical/mental health documents and offender files.</p> <p>Offenders were allowed to send confidential correspondence to this auditor, if they wished. No letters were received from offenders prior to the audit.</p>
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Nevada Department of Corrections (NDOC) website contains a copy of the previous audits conducted for NDOC facilities. It can be found by going to the NDOC home page and selecting the PREA Management Division under quick links. Once that page loads, select PREA Audits under the Resource tab. All of the PREA audits conducted are listed by facility name. Currently listed on the site were the past three audits of the Three Lakes Valley Conservation Camp, with the last one completed on May 1, 2020.</p> <p>The site also lists the statewide Annual Reports from 2009 to 2022.</p>

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

	that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	
115.13 (a)	Supervision and monitoring	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes

	this standard.)	
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
115.52 (f)	Exhaustion of administrative remedies	

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	na

	including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual	yes

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

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

	response to an incident of sexual abuse?	
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

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