

# PREA Facility Audit Report: Final

**Name of Facility:** Lovelock Correctional Center

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 05/25/2025

## Auditor Certification

The contents of this report are accurate to the best of my knowledge.



No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.



I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.



**Auditor Full Name as Signed:** Elaine Bridschge

**Date of Signature:** 05/25/2025

## AUDITOR INFORMATION

**Auditor name:** Bridschge, Elaine

**Email:** risingsunauditing@gmail.com

**Start Date of On-Site Audit:** 04/30/2025

**End Date of On-Site Audit:** 05/02/2025

## FACILITY INFORMATION

**Facility name:** Lovelock Correctional Center

**Facility physical address:** 1200 Prison Road, Lovelock, Nevada - 89419

**Facility mailing address:**

## Primary Contact

<b>Name:</b>	David Stevens
<b>Email Address:</b>	dstevens@doc.nv.gov
<b>Telephone Number:</b>	7759775402

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Nethanjah Breitenbach
<b>Email Address:</b>	nchilders@doc.nv.gov
<b>Telephone Number:</b>	7759775400

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	David Stevens
<b>Email Address:</b>	d-stevens@doc.nv.gov
<b>Telephone Number:</b>	775-977-5402

<b>Facility Health Service Administrator On-site</b>	
<b>Name:</b>	Erin Parks, Director of Nursing
<b>Email Address:</b>	eparks@doc.nv.gov
<b>Telephone Number:</b>	775-977-5496

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	1848
<b>Current population of facility:</b>	1584
<b>Average daily population for the past 12 months:</b>	1509
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>What is the facility's population designation?</b>	Men/boys

<b>In the past 12 months, which population(s) has the facility held? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For definitions of “intersex” and “transgender,” please see <a href="https://www.prearesourcecenter.org/standard/115-5">https://www.prearesourcecenter.org/standard/115-5</a>)</b>	
<b>Age range of population:</b>	18-82
<b>Facility security levels/inmate custody levels:</b>	Medium Security Institution/ Min Custody, Med Custody, Close Custody
<b>Does the facility hold youthful inmates?</b>	No
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	224
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	99
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	85

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

<b>Agency Chief Executive Officer Information:</b>
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<b>Name:</b>	James Dzurenda
<b>Email Address:</b>	jdzurenda@doc.nv.gov
<b>Telephone Number:</b>	725-216-6010

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

Facility AUDIT FINDINGS	
Summary of Audit Findings	
<p>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.</p> <p>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.</p>	
<b>Number of standards exceeded:</b>	
0	
<b>Number of standards met:</b>	
45	
<b>Number of standards not met:</b>	
0	

## POST-AUDIT REPORTING INFORMATION

### GENERAL AUDIT INFORMATION

#### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2025-04-30
2. End date of the onsite portion of the audit:	2025-05-02

#### 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

### AUDITED FACILITY INFORMATION

14. Designated facility capacity:	1848
15. Average daily population for the past 12 months:	1509
16. Number of inmate/resident/detainee housing units:	12
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

<b>18. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	1584
<b>19. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</b>	47
<b>20. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</b>	10
<b>21. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</b>	6
<b>22. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</b>	8
<b>23. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:</b>	51
<b>24. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</b>	56

<b>25. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</b>	20
<b>26. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</b>	4
<b>27. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</b>	82
<b>28. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>29. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</b>	N/A
<b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b>	
<b>30. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</b>	203
<b>31. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b>	107

32. Enter the total number of <b>CONTRACTORS</b> assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	37
33. 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:	N/A
<b>INTERVIEWS</b>	
<b>Inmate/Resident/Detainee Interviews</b>	
<b>Random Inmate/Resident/Detainee Interviews</b>	
34. Enter the total number of <b>RANDOM INMATES/RESIDENTS/DETAINEES</b> who were interviewed:	20
35. Select which characteristics you considered when you selected <b>RANDOM INMATE/RESIDENT/DETAINEE</b> interviewees: (select all that apply)	<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 checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None
36. How did you ensure your sample of <b>RANDOM INMATE/RESIDENT/DETAINEE</b> interviewees was geographically diverse?	Facility provided a detailed offender roster
37. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No



<b>38. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b>	N/A
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
<b>39. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	21
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<b>40. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b>	2
<b>41. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b>	1
<b>42. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b>	1

<b>43. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b>	0
<b>43. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b>	<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.  <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
<b>43. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b>	At the time of the audit there were no offenders housed in this targeted category. This was verified through conversations with staff and offenders, and observations made during the site review.
<b>44. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b>	2
<b>45. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b>	2
<b>46. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b>	5

<b>47. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</b>	4
<b>48. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</b>	3
<b>49. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</b>	0
<b>49. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b>	<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>
<b>49. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b>	At the time of the audit there were no offenders housed in this targeted category. This was verified through conversations with staff and offenders, and observations made during the site review.
<b>50. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b>	N/A

## Staff, Volunteer, and Contractor Interviews

### Random Staff Interviews

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

12

**52. 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

**If "Other," describe:**

Gender

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

- ☒ Yes
- ☐ No

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

N/A

### 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.

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

17

<b>56. Were you able to interview the Agency Head?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>57. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>58. Were you able to interview the PREA Coordinator?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>59. Were you able to interview the PREA Compliance Manager?</b>	<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)

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

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

	<input type="checkbox"/> Other
<b>61. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>61. Enter the total number of VOLUNTEERS who were interviewed:</b>	4
<b>61. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input checked="" type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input type="checkbox"/> Religious <input type="checkbox"/> Other
<b>62. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>62. Enter the total number of CONTRACTORS who were interviewed:</b>	3
<b>62. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Security/detention <input checked="" type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
<b>63. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	N/A

## 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.

**64. Did you have access to all areas of the facility?**

☒ Yes

☐ No

**Was the site review an active, inquiring process that included the following:**

**65. 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)?**

☒ Yes

☐ No

**66. 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)?**

☒ Yes

☐ No

**67. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?**

☒ Yes

☐ No

**68. Informal conversations with staff during the site review (encouraged, not required)?**

☒ Yes

☐ No



<b>69. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</b>	No text provided.
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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.

<b>70. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</b>	<input checked="checked" type="radio"/> Yes  <input type="radio"/> No
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<b>71. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</b>	No text provided.
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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.

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
<b>Inmate-on-inmate sexual abuse</b>	10	10	10	10
<b>Staff-on-inmate sexual abuse</b>	8	8	8	8
<b>Total</b>	18	18	18	18

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
<b>Inmate-on-inmate sexual harassment</b>	11	2	11	2
<b>Staff-on-inmate sexual harassment</b>	5	0	5	0
<b>Total</b>	16	2	16	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.

#### 74. 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	4	0	0	0	0
Staff-on-inmate sexual abuse	3	0	0	0	0
Total	7	0	0	0	0

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	4	1	4	0
Staff-on-inmate sexual abuse	3	0	0	0
Total	7	1	4	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.

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

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
<b>Inmate-on-inmate sexual harassment</b>	3	0	0	0	0
<b>Staff-on-inmate sexual harassment</b>	1	0	0	0	0
<b>Total</b>	4	0	0	0	0

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	3	4	1	3
<b>Staff-on-inmate sexual harassment</b>	1	2	2	0
<b>Total</b>	4	6	3	3

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

**Sexual Abuse Investigation Files Selected for Review**

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

10

<b>79. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)
<b>Inmate-on-inmate sexual abuse investigation files</b>	
<b>80. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b>	6
<b>81. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
<b>82. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
<b>Staff-on-inmate sexual abuse investigation files</b>	
<b>83. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b>	4
<b>84. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

<b>85. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
<b>Sexual Harassment Investigation Files Selected for Review</b>	
<b>86. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	4
<b>87. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)
<b>Inmate-on-inmate sexual harassment investigation files</b>	
<b>88. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	3
<b>89. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
<b>90. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

**Staff-on-inmate sexual harassment investigation files**

**91. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:**

1

**92. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?**

☒ Yes

☐ No

☐ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)

**93. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?**

☒ Yes

☐ No

☐ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)

**94. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.**

N/A

**SUPPORT STAFF INFORMATION****DOJ-certified PREA Auditors Support Staff**

**95. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.**

☐ Yes

☒ No

## Non-certified Support Staff

**96. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.**

☐ Yes

☒ No

## AUDITING ARRANGEMENTS AND COMPENSATION

**97. Who paid you to conduct this audit?**

☒ The audited facility or its parent agency

☐ My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)

☐ A third-party auditing entity (e.g., accreditation body, consulting firm)

☐ Other



Standards
Auditor Overall Determination Definitions
<ul style="list-style-type: none"> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> <li>Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period)</li> <li>Does Not Meet Standard (requires corrective actions)</li> </ul>
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
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.11 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>AR 421 PREA Manual</li> <li>Organizational charts</li> <li>Memorandums from the PREA Coordinator, Director and Warden</li> <li>PREA posters in English and Spanish</li> <li>Interviews with the PREA Coordinator (PC) and the PREA Compliance Manager (PCM)</li> <li>Definitions of prohibited behaviors</li> <li>Transgender-Intersex review committee (review of one offender)</li> <li>Strategies for preventing, detecting, and responding to sexual misconduct</li> <li>Sanctions for violating the zero-tolerance policy</li> </ol> <p>Findings:</p> <p>115.11 Zero tolerance of sexual abuse and sexual harassment; PREA coordinator.</p> <p>A) The Department has a Zero Tolerance policy for any form of sexual misconduct to</p>

	<p>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. The Department shall take a proactive approach regarding the prevention, detection, response, and punishment of any type of sexual contact.</p> <p>B) As evidenced by a review of AR 421 PREA Manual, Organizational chart and a memo from the Director designating the PREA Coordinator, The Warden designated a PREA Compliance Manager, (PCM) who stated they did not have sufficient time and authority to coordinate the facilities' compliance with the PREA standards, the PREA Coordinator submitted a memo assigning a backup PCM. The PCM has direct access to the Warden, the facility's executive or senior leadership team, and the Department's PREA coordinator.</p> <p>C) The Director has designated a department-wide PREA Coordinator who will have sufficient time and authority to oversee the Department's efforts to comply with the PREA standards in all its facilities, including providing direction to all facility Wardens, Associate Wardens, and facility PREA Compliance Managers' efforts to comply with the PREA standards. This position is assigned to the Office of the Inspector General, PREA Management Division, and supervised by the Inspector General. The PREA Coordinator will have direct access to the Director and the Department's executive leadership team</p> <p>The Department prohibits retaliation against any person because of his/her involvement in the reporting or investigation of a complaint.</p> <p>Interviews with the PC and the PCM confirm that they have sufficient time to manage all of their PREA-related responsibilities.</p> <p>The facility meets compliance with this standard.</p>
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115.12	Contracting with other entities for the confinement of inmates
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. Pre-audit questionnaire (PAQ)</li> <li>2. Interview with the contract administrator</li> <li>3. Memorandum from the PREA Coordinator (PC)</li> </ol>

	<p>Findings:</p> <p>115.12 Contracting with other entities for the confinement of inmates.</p> <p>A) B) According to the memo from the PC and interview with the agency's contract administrator, the Nevada Department of Corrections (NDOC) had entered into a contract with Core Civic, Inc. to house NDOC offenders at the Saguaro Correctional Center (SCC) in Arizona. In November 2020, all NDOC offenders housed at SCC returned to NDOC. The contract has expired and was not renewed. As such, standard 115.12 is not applicable and therefore compliant.</p> <p>The facility meets compliance with this standard.</p>
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115.13	Supervision and monitoring
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>115.13 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. Sample logs documenting unannounced rounds (12 months)</li> <li>2. Staffing plan</li> <li>3. Staffing plan reviews for 2023 and 2024</li> <li>4. Site review observation</li> <li>5. Interviews with staff that conduct unannounced rounds, PREA Compliance Manager (PCM), PREA Coordinator (PC), and the Warden.</li> <li>6. AR 421 Policy</li> <li>7. OP 326 Minimum Staffing Requirements</li> <li>8. AR 400 The General Security Supervision guidelines</li> <li>9. Pre-audit Questionnaire (PAQ)</li> </ol> <p>Findings:</p> <p>115.13 Supervision and monitoring.</p> <p>A) As evidenced by the staffing plan the facility developed, documented, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect inmates against sexual abuse. As evidenced by the staffing plan submitted the Warden has developed a staffing plan that provides for adequate levels of staffing, and video monitoring, to protect offenders against sexual abuse.</p> <p>B) The facility documents and justify all deviations from the staffing plan. The facility has stated that there are no deviations from the staffing plan.</p>

C) As evidenced by the staffing plan review the facility at least once every year the facility in collaboration with the PREA Coordinator will review the staffing plan and make adjustments as needed in the following areas: The deployment of monitoring technology, the allocation of Agency/Institution or Facility resources to commit to the staffing plan to ensure PREA compliance. The Staffing Review will be submitted to the Deputy Director of Operations who will provide a copy to the PREA Coordinator for review.

D) AR 400 The General Security Supervision guidelines state: A high priority will be placed in all Department institutions/facilities to ensure the visibility of top staff in the facility. Daily Administrative Tours (DAT) are intended to bolster the visibility of administrative personnel within Department institutions. By fostering accessible communication with frontline staff, mid-level managers, and offenders, DAT plays a pivotal role in our institutional oversight strategy. This daily initiative ensures a continuous assessment of facilities, maintaining the highest standards of operation.

The auditor reviewed the logs of supervisor rounds noting the unannounced rounds were completed on each shift as required. After a review of the documents submitted in the PAQ, the staffing plan and logs of supervisory rounds, the facility meets all the elements of this provision.

During the site review observation, staffing numbers and placement matched the staffing plan. Tier tours are conducted hourly. Staff have a good line of sight with no blind spots observed. Offender movement is monitored by staff. Informal conversations with staff confirmed the staffing plan is followed. Informal conversations with offenders confirmed their accessibility to staff. Cameras/mirrors were observed with adequate placement and in operational order. Live view cameras were observed from a control area. Areas that are restricted from offenders are under video surveillance. Offender movement throughout the facility is monitored via cameras and offenders are escorted by staff.

When offenders are in cells, they are monitored through staff supervision and a closed camera system is in the suicide rooms. No cross-gender viewing was observed. Staff complete cell checks regularly.

Informal conversations with staff regarding staffing norms, understaffing, shortages, overcrowding and staffing ratios were unremarkable. Staff stated that unannounced rounds occur on each shift daily and that to meet staffing ratios, mandated overtime is enforced.

Informal conversations with offenders regarding safety, accessibility or limits to programming, education, work, and overcrowding in housing units were unremarkable. Offenders spoke to felt safe and seemed to have a good rapport with staff.

According to interviews, unannounced rounds are conducted randomly and at staggered times on every shift daily by shift supervisors. Completed rounds are documented in a logbook. The PCM was able to explain what the staffing plan

	<p>considers. The PC is consulted regarding any adjustments or assessments made to the staffing plan. The facility develops a staffing plan, and the Warden was able to explain what the staffing plan considers. Rounds are conducted to check for compliance. Deviations are documented.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.14 Youthful inmates</b>	
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. Pre-audit questionnaire (PAQ)</li> <li>2. Site review observations</li> </ol> <p>Findings:</p> <p>115.14 Youthful inmates.</p> <p>A) B) C) According to the information in the PAQ and the site review observation, the facility does not house juvenal offenders.</p> <p>This standard is not applicable, therefore is compliant.</p>

<b>115.15 Limits to cross-gender viewing and searches</b>	
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.15 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. AR 421 Search policy</li> <li>2. One-page instruction on Standard clothed body search.</li> <li>3. Officer training curriculum</li> <li>4. Site review observations</li> <li>5. Interviews with 12 random staff, five transgender offenders and three offenders who identified as gay or bisexual</li> <li>6. Signed training acknowledgement forms for defensive tactics on cross gender searches</li> <li>7. Pre-audit questionnaire (PAQ)</li> <li>8. Unannounced security checks</li> </ol>

- 9. AR 422 Search of Offenders
- 10. Memo by PREA Coordinator (PC)

Findings:

115.15 Limits to cross-gender viewing and searches.

A) As evidenced by AR 421 staff do not conduct cross-gender strip, Patt or cross-gender visual body cavity searches except in exigent circumstances or when performed by medical practitioners. All exigent cross-gender strip or cross-gender visual body cavity searches will be immediately reported to the Warden/designee and PCM in every instance. All exigent cross-gender strip or cross-gender visual body cavity searches will be documented in NOTIS for every instance. According to the information submitted thru the PAQ there have been no cross-gender searches.

B) does not apply the facility does not hold female inmates,

C) According to the information in the PAQ the facility did not conduct any cross-gender searches.

D) The facility implemented policies and procedures that enable 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. Such policies and procedures shall require staff of the opposite gender to announce their presence when entering an inmate housing unit. Auditor reviewed unannounced security checks.

E) Policy 422.04 Search of inmate's state: LCC shall not search or physically examine a transgender or intersex inmate for the is unknown, it may be determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner.

F) The facility trained security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. The auditor reviewed 18 signed acknowledgments from staff who attended the training on cross gender pat down searches and a list of all custody staff that received the training on cross gender searches. The PREA coordinator submitted a memo stating "all custody staff receive training on the agencies Universal Pat Search procedure. This style of pat search is conducted in the same fashion for all inmates by utilizing back of the hand/blade of the hand around the breast/chest area".

Offenders are required to undress in their sleeping rooms or showers. Shower rooms contain shower curtains for privacy. Same gender staff conduct the searches.

Medical exam rooms were observed. Exam rooms do not have cameras or mirrors and

	<p>have privacy curtains to use when needed. Security staff are posted outside of the exam rooms.</p> <p>The auditor observed verbal announcements being made by staff when entering housing units and shower areas. The announcement was loud and clear where offenders on all levels could hear, and the announcement provided ample time for offenders to cover up. Offenders that are deaf, hard of hearing, have a cognitive or physical disability, or limited English proficient would be properly alerted to staff of the opposite gender entering the housing unit. Administrative staff would seek assistance through the contracted interpreter's office. The facility also employed signage to alert offenders when female staff are present.</p> <p>Informal conversations with staff regarding procedures to prevent cross-gender viewing via electronic monitoring, staff assigned to monitor, live or recorded video, and frequency of monitoring was unremarkable. Staff verified that cross-gender announcements are made when entering the units and that unannounced rounds are conducted by higher level staff. Staff stated that they are prohibited from cross-gender viewing and searches.</p> <p>Informal conversations with offenders were held. Offenders stated that they are able to change clothes, use the toilet, and shower without staff of the opposite gender being able to view them. Offenders confirmed that staff announce themselves when entering the unit. Offenders also confirmed that cross-gender viewing and cross-gender searches are not allowed.</p> <p>According to interviews, the facility does not conduct cross gender pat-down, strip or visual body cavity searches. Searching a transgender or intersex offender for the sole purpose of determining that offender's genital status is prohibited by policy. Staff understand that they are to announce themselves when entering units that house the opposite gender from themselves.</p> <p>Staff understand that offenders are able to dress, shower, and use the toilet without being viewed by staff of the opposite gender. The facility does not have a unit designated solely to house LGBTI offenders.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.16</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>
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	<div data-bbox="256 118 959 152" data-label="Section-Header"> <p><b>Auditor Overall Determination: Meets Standard</b></p> </div> <div data-bbox="256 197 542 230" data-label="Section-Header"> <p><b>Auditor Discussion</b></p> </div> <div data-bbox="256 275 1495 2056" data-label="Text"> <p>115.16 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. The Policy and Correction Administrative Regulation 658 " Reasonable accommodation for offenders with Disabilities"</li> <li>2. Contract for American Sign Language</li> <li>3. Contract for interpretation service with CTS Language Link (provides services for 240 languages)</li> <li>4. Contract with CAS (Communication Access Services) that provides services for the deaf and the hard of hearing.</li> <li>5. A large font PREA orientation handout</li> <li>6. PREA education video</li> <li>7. Site review observations</li> <li>8. Interviews with the Director; 12 random staff; two limited English proficient offenders; one offender with a physical disability, one offender with a visual impairment, and one offender with a cognitive learning disability.</li> <li>9. Pre-audit questionnaire (PAQ)</li> <li>10. Memo from the PREA Coordinator (PC)</li> </ol> <p>115.16 Inmates with disabilities and inmates who are limited English proficient.</p> <p>A) The facility does not rely solely on printed materials to communicate with residents; intake, education, acceptance of complaints and reports of abuse or harassment, and investigations all involve face-to-face staff/resident contact so that an assessment can be made of the resident's understanding of the communication. The facility has a Contract for American Sign Language, contract for interpretation service with CTS language Link (provides services for 240 languages), contract with CAS (Communication Access Services) that provides services for the deaf and hard of hearing They submitted a large font PREA orientation handout. All the PREA education is in English and Spanish. The PREA education is presented in a video that is in English and Spanish that has close captioning and sign language.</p> <p>B) The facility has developed a procedure that utilizes 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 or sexual harassment. Reviewed MOUs.</p> <p>C) The staff do not use and/or rely upon offender interpreters, offender readers, or other types of offender assistants. The facility stated they have not used offender interpreters. Memo from the PREA Coordinator stating "The facility must have material printed and accessible to all offenders including those who are limited English proficient, deaf/hard of hearing, blind/visually impaired, limited reading skills, mental/cognitive disabilities etc. If an offender does not speak, read, or fully comprehend English, designated bilingual staff at the facility must be contacted or contact CTC. Translation Services to conduct PREA risk screening assessments and verbally translate PREA education/orientation handout (if other than Spanish). The</p> </div>
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	<p>facility must document and notify the PCM when using designated staff translators or translation services."</p> <p>According to interviews, the agency does not allow offenders to interpret PREA-related information to other offenders. Policies and contracts are in place to assist with interpretation. The facility contracts with multiple interpretation agencies. The facility provides information regarding sexual abuse and sexual harassment that offenders are able to understand. The facility staff are able to help offenders read, write, speak or explain things. The facility has designated bilingual staff that can be called to translate.</p> <p>Language link information was readily available to staff and offenders. The auditor made a test call to the Language Link when interviewing limited English proficient offenders. A voice service answers and asks them to select a language, then transfers you to the appropriate interpreter. The call is free for offenders and does not require a PIN number to be entered. Services are available on demand.</p> <p>Informal conversations with staff and offenders confirm their understanding of the services available and how to access them if needed.</p> <p>The facility meets compliance with this standard.</p>
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115.17	Hiring and promotion decisions
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>115.17 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. Volunteer and Contractor background record checks</li> <li>2. Seven background records checks on staff</li> <li>3. New hire questionnaire that asks all applicants and employees who may have contact with offenders directly about previous sexual misconduct.</li> <li>4. Consent to release criminal history that all new hires, contractors and volunteers have to sign.</li> <li>5. Interview with HR staff</li> <li>6. A set of background forms used</li> <li>7. Acknowledgement Form and cooperation agreement for contractors or vendors that require PREA training and background checks</li> <li>8. A list of new staff and staff who have been employed for 5 years who needed background checks</li> </ol>

9. 421.04 Hiring and Promotion Decision Policy

115.17 Hiring and promotion decisions.

A) As evidenced by the backgrounds submitted the department does not hire or promote anyone who may have contact with offenders and does not enlist the services of any contractor or volunteer who may have contact with an offender who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other facilities. Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above.

B) As evidenced by the questionnaires asking about any previous misconduct. The Department considers any incidents of sexual harassment in determining whether to hire or promote anyone or enlist the services of any contractor, who may have contact with offenders.

C) As evidenced by the 8 backgrounds submitted the facility AR 421 states that before hiring new employees, who may have contact with offenders, Human Resources (HR) Performs a National Criminal Information Center (NCIC) and FBI fingerprint criminal background records check and Consistent with Federal, State, and local law and makes its best effort to contact all prior facility employers for information on substantiated allegations of sexual base or any resignation during a pending investigation of an allegation of sexual abuse a criminal background records check shall be performed.

D) Policy 421.04 Hiring and Promotion Decision states: As evidenced by the background checks reviewed the Department performs a criminal background records check before enlisting the services of any contractor who may have contact with offenders.

E) Policy 421.04 Hiring and Promotion Decision states: The Department shall conduct criminal background records checks at least every five (5) years of current employees and contractors who may have contact with offenders. The facility provided the list of all employees and their hire dates to identify when employees should have a background check.

F) AR 421 States: The Department shall ask all applicants and employees who may have contact with offenders directly about previous misconduct referenced above under 1. (a-c), in written applications or interviews for hiring and promotions Any material omissions or false or misleading information shall be grounds for termination. Auditor reviewed the questionnaires concerning previous sexual misconduct. All staff have an affirmative and immediate duty to disclose any sexual abuse conduct.

According to interviews, the facility performs criminal background record checks on all newly hired employees, employees considered for promotion and contractors. The

	<p>facility considers prior incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contactor. All applicants and employees are asked about previous misconduct for hiring and promotions using a PREA questionnaire sheet. The facility imposes upon employees a duty to disclose any such previous misconduct. When a former employee applies for work at another institution, the facility will provide information on substantiated allegations of sexual abuse or sexual harassment involving that former employee.</p> <p>The facility meets compliance with this standard.</p>
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115.18 Upgrades to facilities and technologies	
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. Pre-audit questionnaire (PAQ)</li> <li>2. Interviews with the Director and the Warden</li> <li>3. AR 421 PREA Manual</li> <li>4. Purchase orders</li> <li>5. Receipts for new cameras</li> </ol> <p>Findings:</p> <p>115.18 Upgrades to facilities and technologies.</p> <p>A) When the Department is designing or acquiring any new institutions or facilities or planning any substantial expansion or modification to existing facilities the Director, Deputy Director(s), and designees shall consider the effect of the design, acquisition, expansion, or modification on the agency's ability to protect offenders from sexual abuse. According to the information in the PAQ the facility has not made any major changes to the facility.</p> <p>B) When installing or updating any video monitoring system, electronic surveillance system, or other types of monitoring technology, the Department shall consider the technology and how it may enhance the Department's ability to protect offenders from sexual abuse. The facility has installed new cameras.</p> <p>According to interviews, PREA would be considered in any facility expansion, modification or camera upgrade.</p>

	The facility meets compliance with this standard.
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<b>115.21</b>	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.21 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. 421.11 Criminal and Administrative Investigations Policy</li> <li>2. National Protocol for Sexual Assault Medical Forensic Exams</li> <li>3. Recommendations for administrators from the US Department of Justice on forensic exams and the medical Directive.</li> <li>4. Memo from the PREA Coordinator (PC)</li> <li>5. Contract for victim advocacy with Signs of Hope</li> <li>6. Flyer that describes how to contact Signs of Hope</li> <li>7. Community advocate questionnaire with Signs of Hope</li> <li>8. Interviews with random staff, PREA Compliance Manager (PCM), and four offenders who reported sexual abuse</li> <li>9. Investigator training curriculum and certificates</li> <li>10. Advocacy Request Forms DOC 1919-1 (English) and DOC 1919-2 (Spanish)</li> <li>11. Nevada Sexual Assault Survivors Bill of Rights</li> </ol> <p>Findings:</p> <p>§ 115.21 Evidence protocol and forensic medical examinations.</p> <p>A) According to 421.11 Criminal and Administrative Investigations: 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. Reviewed training curricular and certificates for all investigators.</p> <p>B) The protocol shall be developmentally appropriate for youth where applicable, and, as appropriate, shall be 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.</p> <p>There are no youth housed at the facility, but the investigative protocol meets “The National Protocol for Sexual Assault Medical Forensic Examinations, Adults/ Adolescents.”</p> <p>C) Memo from the PC states: "The State of Nevada only has two geographical locations where incarcerated offenders who report an allegation of sexual abuse</p>

requiring a sexual assault forensic exam are transported to. Depending on the geographical location of the facility the offender would be transported to a hospital in Las Vegas or Renown Hospital in Reno. Exams are performed by a Sexual Assault Nurse Examiner (SANE) or Sexual Assault Forensic Examiner (SAFE)." A memo from PREA Coordinator "Medical staff will contact the signs of hope in Las Vegas, NV and request services from the contracted volunteer. The volunteer from the Signs of Hope will be approved to meet with the victim at the hospital and/or institution."

D) The facility makes available to the victim a victim advocate from a rape crisis center. The facility submitted a contract for victim advocacy with Signs of Hope and a flyer that describes how to contact Signs of Hope

E) As evidenced by the MOU a victim advocate, qualified agency staff member, or qualified community-based organization staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals.

A Memo from the PREA Coordinator states: Effective immediately Institutions and Facilities will utilize Advocacy Request Forms DOC 1919-1 (English) or DOC 1919-2 (Spanish) when an offender reports an incident of sexual abuse in confinement (new report). These forms were developed to support compliance with the above standards and the Nevada Sexual Assault Survivors Bill of Rights. These new forms will ensure offender victims of sexual abuse understand their right to request support from the community victim advocate during the sexual assault forensic exam (if applicable), during the investigation interview, and ongoing emotional support. The facility submitted the advocacy request form.

F) The Office of the Inspector General (OIG), Criminal Investigators is responsible for investigating all allegations of sexual abuse. Criminal investigators and facility supervisors shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecution.

According to interviews, SAFE/SANE examinations are not provided by facility medical staff. This specific exam is conducted at two regionalized hospitals. Staff understand the agency's protocol for obtaining usable physical evidence if an offender alleges sexual abuse. The facility allows the victim to contact a victim advocacy agency. The facility has a contract with a victim advocacy agency. Staff are aware that the OIG conducts sexual abuse investigations.

The facility meets compliance with this standard.

115.22	Policies to ensure referrals of allegations for investigations
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.22 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. AR 457 policy on PREA investigations</li> <li>2. Investigation tracking sheets for offender on offender and staff on offender allegations of sexual harassment or sexual abuse.</li> <li>3. Link on the department's website describing the investigation protocol authored by the Office of the Inspector General (OIG)</li> <li>4. AR 421 Policy</li> <li>5. Interviews with the Director and investigators</li> <li>6. PREA incidents and annual reports from 2009 through 2023</li> <li>7. 115.22 policies</li> </ol> <p>Findings:</p> <p>115.22 Policies to ensure referrals of allegations for investigations.</p> <p>A) As evidenced by 115.22 Policies to ensure referrals of allegations for investigations the department supports the zero-tolerance standard for sexual abuse and sexual harassment by aggressively responding to, investigating, and supporting the prosecution of incidents of sexual abuse and sexual harassment in all department facilities. The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. The Department policy requires that criminal investigators and facility supervisors shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecution.</p> <p>B) AR 457 department policy submitted requires the IG's (Inspector General) Office will review, assign and investigate as promptly, thoroughly and objectively as possible, all reports of offender sexual harassment and sexual abuse, including third-party and anonymous reporting. All investigations will include collection, preservation, and documentation of any direct and/or circumstantial evidence. There is a link on the department's website describing the investigation protocol.</p> <p>C) D) E) are not applicable due to the OIG investigating all sexual misconduct. The agency has published such policy on its website. The auditor checked the website to ensure compliance. There is a link on the department's website describing the investigation protocol. The Department policy requires that criminal investigators and facility supervisors follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecution.</p> <p>According to interviews, the OIG conducts all criminal investigations. The agency ensures that investigations are completed for all allegations of sexual abuse and sexual harassment.</p>

	The facility meets compliance with this standard.
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<b>115.31</b>	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.31 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. PREA policy on training</li> <li>2. Staff PREA training curriculum (initial and annual)</li> <li>3. Signed training acknowledgements</li> <li>4. Pre-audit questionnaire (PAQ)</li> <li>5. Interviews with random staff</li> <li>6. 421.02 Preventing, Detecting and Responding to Allegations of Sexual Abuse or Sexual Harassment</li> <li>7. Policy 115.31</li> <li>8. Policy AR 421</li> <li>9. Complete list of staff and what training the completed</li> <li>10. Negative tacking report</li> </ol> <p>Findings:</p> <p>115.31 Employee training.</p> <p>A) The facility trains all employees who may have contact with inmates on: Its zero-tolerance policy for sexual abuse and sexual harassment. How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures. Inmates' right to be free from sexual abuse and sexual harassment. The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment. The dynamics of sexual abuse and sexual harassment in confinement. The common reactions of sexual abuse and sexual harassment victims. How to detect and respond to signs of threatened and actual sexual abuse. How to avoid inappropriate relationships with inmates. How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.</p> <p>As stated in AR 421 to be most effective in providing a safe environment, all staff members must recognize the signs of sexual abuse and sexual harassment and understand their responsibility in the detection, prevention, response and reporting of alleged sexual abuse or sexual harassment of residents. The Employee Development Division (EDD), with input from the PREA Coordinator, will develop, revise, and provide a block of instruction to all staff on the requirements and responsibilities</p>

	<p>related to PREA. The facility training coordinator ensures training is properly delivered and documented. Staff, volunteers, and contractors must verify by signature, or electronic confirmation, that they have received and understand the PREA training.</p> <p>B) Such training is tailored to genders of the inmates at the department. As stated in AR 421 the department employee training is tailored to address all genders of offenders in a correctional facility; therefore, additional training is not required when a staff member transfers to a different gender facility.</p> <p>C) All current employees who have not received such training shall be trained within one year of the effective date of the PREA standards, and the agency shall 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. In years in which an employee does not receive refresher training, the agency shall provide refresher information on current sexual abuse and sexual harassment policies. AR 421 states: At a minimum of every two years, all staff will receive a refresher PREA training during even years as part of in-service training (IST). In odd years, all staff will receive information on the Department's current sexual abuse and sexual harassment policies. In-service refresher training will be provided during in class instruction or web-based computer training. EDD will maintain a negative tracking report and provide a copy to the facility Wardens to ensure staff have completed PREA training. EDD will maintain signed training acknowledgment forms, training certificates, and/or electronic training verification for all employees.</p> <p>D) The agency documents, through employee signature or electronic verification, that employees understand the training they have received. The signature or electronic verification is an affirmative acknowledgment that each staff member understands the training received.</p> <p>According to interviews, staff receive PREA training at hire and refresher training and/or information related to the PREA policy every year thereafter.</p> <p>The facility meets compliance with this standard.</p>
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115.32	Volunteer and contractor training
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.32 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. The volunteer and contractors PREA training requirements</li> </ol>



	<p>2. The contracts policy</p> <p>3. Community volunteer program policy</p> <p>4. The training curricular and sample training records for twelve volunteers and contractors</p> <p>5. The approved Volunteer list (agency-wide)</p> <p>6. Volunteer and Contractor signed training acknowledgements for PREA training</p> <p>7. Interviews with contractors and volunteers</p> <p>8. AR 212 policy</p> <p>9. AR 421 policy</p> <p>10. OP 422 policy</p> <p>11. Vender background report</p> <p>12. Twelve volunteer and Contractor training files that contain a volunteer agreement, confidential agreement, tobacco prohibition form, information and technology and telecommunication devices requirements form, offender familiarity disclosure form, previous sexual misconduct questionnaire, zero-tolerance policy and PREA training acknowledgement forms.</p> <p>13. 115.32 Contracts policy</p> <p>Findings:</p> <p>115.32 Volunteer and contractor training.</p> <p>A) As evidenced by the training curricular and signed acknowledgments the facility ensures 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</p> <p>B) According to 115.32 contracts policy states: The level and type of training provided to contractors shall be based on the services they provide and the level of contact they have with inmates. All contractors who have contact with inmates shall be notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.</p> <p>C) The facility maintains documentation confirming that volunteers and contractors understand the training they have received. As evidenced by the training files the facility maintains documentation confirming that volunteers and contractors understand the training they have received.</p> <p>According to interviews, contractors and volunteers have been trained in their responsibilities regarding sexual abuse and sexual harassment prevention, detection and response, to include the agency's zero tolerance policy and how to report incidents. Training is received prior to them working with offenders.</p> <p>The facility meets compliance with this standard.</p>
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<b>Auditor Overall Determination:</b> Meets Standard
<b>Auditor Discussion</b>
<p>115.33 Evidence analyzed:</p> <ol style="list-style-type: none"><li>1. The offender orientation manual</li><li>2. Offender PREA education facilitator guide</li><li>3. Large font orientation handout in English and Spanish</li><li>4. The Intake PREA training video in English, Spanish, close caption that includes sign language</li><li>5. "Don't touch me" video</li><li>6. Comprehensive PREA training video English, Spanish, close caption, includes sign language</li><li>7. Large font orientation handout</li><li>8. Photos of the posters that state the zero-tolerance policy and hot line number</li><li>9. The offender PREA training curriculum</li><li>10. Samples of training acknowledgement forms of attendance</li><li>11. Site review observations</li><li>12. Interviews with intake staff and random offenders</li><li>13. AR 421 PREA Manual</li><li>14. Memo from the PREA Coordinator (PC)</li><li>15. 25 signed offender training acknowledgement forms</li><li>16. OP 504 Processing of Offenders policy</li><li>17. Website review</li></ol> <p>Findings:</p> <p>§ 115.33 Inmate education.</p> <p>A) As evidenced by OP 504 Processing of inmates received, the Intake PREA training video in English, Spanish, close caption that includes sign language, the comprehensive PREA training video in English, Spanish, close caption, includes sign language, large font orientation handout all describes how the facility developed and implemented a policy and practice that upon intake of any new offender to the facility, that offender will receive information about the Department's zero-tolerance policy and how to report a suspicion or an incident of sexual abuse or sexual harassment. All inmates will be required to watch a 3-minute video within 72 hours of intake on PREA and reporting.</p> <p>B) According to requirements of AR 421 and a review of the PREA training curricular the facility has developed and implemented a policy and practice that upon intake of any new offender to the facility, that offender will receive information about the Department's zero-tolerance policy and how to report a suspicion or an incident of sexual abuse or sexual harassment. The facility has developed and implement a process wherein every offender will receive a block of comprehensive education within 30 days of intake or reception to the institution or facility. The block of education includes:</p>

- a. Their rights to be free from sexual abuse and sexual harassment.
- b. Their rights to be free from retaliation for reporting such incidents; and
- c. The policies and procedures for responding to such incidents.

C) Current inmates who have not received such education shall be educated within one year of the effective date of the PREA standards and shall 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.

Not applicable all inmates have received the training.

D) The facility has provided inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. As evidenced by OP 504 Processing of inmates received and the memo from the PREA Coordinator the facility will provide education in formats accessible for all inmates. Education includes the Intake PREA training video in English, Spanish, close caption that includes sign language, the comprehensive PREA training video in English, Spanish, close caption, includes sign language, large font orientation handout. Offender education is available in formats accessible to all offenders including those offenders that are:

- a. Limited English proficiency.
- b. Visually impaired.
- c. Otherwise disabled; and
- d. Limited in their reading skills.

E. The facility maintains documentation of inmate participation in these education sessions. Confirmation of all offenders participating in PREA offender education will be documented within the Nevada Offender Information Tracking System (NOTIS) case note each time the initial intake information or comprehensive education is provided to each offender. After a review of the 25 training acknowledgments the facility is providing the required PREA training.

F) Each facility PCM has placed PREA posters in areas where staff and offenders are present and make readily available offender handbooks for all offenders. The facility submitted pictures of posters placed around the institution.

Third party reporting information is posted in each unit, public lobby, and other areas frequented by offenders, staff, visitors and contractors. It is also located on the agency website. Other PREA signage, such as zero tolerance information are available in each unit. This information is readily available throughout the facility. PREA flyers are in all units. Electronic reporting methods are not available to offenders. Staff and third-party electronic reporting are available on the agency's website.

Informal conversations with staff and offenders were held during the facility tour. All stated that PREA information is readable and accessible; contains consistent and accurate information; and always posted. The Audit Notice has been posted for

	<p>several weeks and offenders pointed out that the Notice contains the date it was posted.</p> <p>The auditor observed a mock demonstration of the intake process where PREA information/zero tolerance is provided to all offenders upon entry to the facility. Designated intake staff are responsible for this process. Offenders receive a PREA handout and zero tolerance information containing PREA information. The handout is reviewed verbally with each offender. Written information is clear and at an appropriate reading level. Offenders also watch a PREA video.</p> <p>Offenders sign an acknowledgement of understanding form after the review. Materials are available in English and Spanish. Language Link information was readily available to staff and offenders. The auditor made a test call to the language line during interviews with limited English proficient offenders. A message asks that you select a language from a list of languages, and then you are transferred to a person that speaks the requested language. The call is free to offenders and does not require a PIN number to be entered. Services are available on demand.</p> <p>Staff demonstrated to the auditor how comprehensive education is provided to all offenders during the intake process upon arrival via a PREA video. Additionally, posters are provided throughout the facility containing PREA education and information. After the video, offenders are able to ask questions from intake staff. Offenders sign an acknowledgement of understanding. The video contains their rights to be free of sexual abuse and sexual harassment and to be free of retaliation for reporting such incidents. Video is available in multiple languages and in closed captioning. It can be viewed, listened to and read.</p> <p>Informal conversations with staff confirmed their understanding of the information provided during the intake process. Informal conversations with staff and offenders confirm their understanding of the language services available and how to access them if needed.</p> <p>According to interviews, intake staff provide offenders with information about the agency's zero- tolerance policy and how to report incidents or suspicions of sexual abuse and sexual harassment during the PREA orientation upon arrival to the facility. Offenders are provided with a PREA video, PREA packet and in-person review by intake staff. PREA signage is located throughout the facility.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

115.34 Evidence analyzed:

1. The NIC Training curricula for initial and advanced investigators training
2. The Investigator PREA training tracker log
3. All investigator training certifications
4. Memo from the PREA Coordinator (PC)
5. Interviews with investigators

Findings:

115.34 Specialized training: Investigations.

A) The Department PREA policy stated that training for investigators in addition to required staff PREA training, all Office of the Inspector General Criminal Investigators, and facility custody supervisors will complete specialized investigator training in conducting sexual abuse investigations in a confinement setting.

B) Training includes but not be limited to: Techniques for interviewing sexual abuse victims; Proper use of Miranda and Garrity warnings; Sexual abuse evidence collection in confinement settings; and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

C. OIG Investigators will complete this training within one month of the date of hire. Facility supervisors, Sergeant or above will complete within one month of hire/ promotion date. Facility supervisors will complete a refresher course every three years and the facility PREA compliance manager will maintain the signed training acknowledgment forms, training certificates, and/or electronic training verification. The auditor reviewed all investigator training certifications.

D. The OIG investigates all sexual misconduct allegations. The auditor received a memo from the PC stating: "In compliance with the standard, the Office of the Inspector General Criminal Investigators and designated facility supervisory staff take the National Institute of Corrections on-line Specialized Investigator training at <https://nic.learm.com/learmcenter>. The main purpose of this course is to assist agencies in meeting the requirements of Prison Rape Elimination Act (PREA) Section 115.34 Specialized Training for Investigators. At the end of this course, investigators and designated facility staff will be able to explain the knowledge, components, and considerations that an investigator must use to perform a successful sexual abuse or sexual harassment investigation consistent with PREA standards".

The auditor received a memo from the PREA Coordinator stating: "In compliance the standard, the Office of the Inspector General Criminal Investigators and designated facility supervisory staff take the National Institute of Corrections on-line Specialize Investigator training at <https://nic.learm.com/learmcenter>. The main purpose of this course is to assist agencies in meeting the requirements of Prison Rape Elimination Act (PREA) Section 115.34 Specialized Training for Investigators. At the end of this course, investigators and designated facility staff will be able to explain the knowledge, components, and considerations that an investigator must use to perform a successful sexual abuse or sexual harassment investigation consistent with PREA standards".

	<p>According to interviews, investigative staff received training specific to conducting sexual abuse and sexual harassment investigations.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.35</b>	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.35 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. AR 421 Policy</li> <li>2. List of medical and mental health staff</li> <li>3. National Institute of Corrections (NIC) Specialized training for medical and mental health staff curricular</li> <li>4. Memo from the PREA Coordinator (PC)</li> <li>5. PREA training acknowledgement forms for all medical and mental health staff</li> <li>6. Interviews with medical and mental health staff</li> </ol> <p>Findings:</p> <p>115.35 Specialized training: Medical and mental health care.</p> <p>A) As evidenced by the training records the facility has ensured that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: (1) How to detect and assess signs of sexual abuse and sexual harassment; (2) How to preserve physical evidence of sexual abuse; (3) How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and (4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.</p> <p>B) If medical staff employed by the agency conduct forensic examinations, such medical staff shall receive the appropriate training to conduct such examinations. Memo from the PREA Coordinator stating: "This element is not applicable to NDOC. Inmates alleging sexual assault within time frame for physical evidence collection are transported to off-site for a sexual assault forensic exam, which are conduct by a certified sexual assault nurse examiner."</p> <p>C) As evidenced by the training records the facility maintains documentation that medical and mental health practitioners have received the training referenced in this standard. The institution and facility PREA compliance manager maintains the signed training acknowledgment forms, training certificates, and/or electronic training verification.</p>

	<p>D) All full-time and part-time medical and mental health care practitioners, including contract medical practitioners completes this training as soon as they have received computer access and again every three years. The Auditor reviewed an excerpt from a memo from the PREA Coordinator: "In compliance the standard all Medical and Mental Health practitioners take the National Institute of Corrections on-line Specialized Medical and Mental Health training. Medical Health Care for Sexual Assault Victims in Confinement Setting: The purpose of this course is to assist agencies in meeting the requirements of the Prison Rape Elimination Act (PREA) Section 115.35. At the end of this course staff will be able to explain the PREA standards that relate to the provision of medical care for victims of sexual abuse. They will also be able to describe their role and responsibilities in providing this care."</p> <p>According to interviews, facility medical staff do not conduct forensic examinations. Medical staff will complete an initial wellness assessment prior to sending the offender out to the local hospital. Medical and mental health staff receive regular staff training and specialized training regarding sexual abuse and sexual harassment. Training is documented.</p> <p>The facility meets compliance with this standard.</p>
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115.41 Screening for risk of victimization and abusiveness	
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.41 Evidence Analyzed:</p> <ol style="list-style-type: none"> <li>1. The assessment flow chart identifies the steps for assessments from the time the offender arrives at the facility (initial assessment, follow-up assessment within 21 days, and special assessments).</li> <li>2. Offender PREA assessments</li> <li>3. Follow up tracking logs (offender tracker)</li> <li>4. 19 samples of PREA assessments and reassessments</li> <li>5. AR 573 policy</li> <li>6. Site review observations</li> <li>7. Interviews with risk screeners, random offenders, the PREA Coordinator (PC), and the PREA Compliance Manager (PCM)</li> <li>8. Offender PREA assessment logs</li> <li>9. Transgender intersex questionnaire</li> <li>10. Screening for risk of victimization and abusiveness</li> <li>11. List of arrival dates for offenders entering the facility</li> </ol> <p>Findings:</p> <p>115.41 Screening for risk of victimization and abusiveness.</p>

A) AR 573 states: All inmates shall be assessed, during intake and upon transfer to another facility, for their risk of being sexually abused by other inmates or sexually abusive toward other inmates in accordance with federal PREA standards. Auditor reviewed 19 assessments.

B) AR 573 States: All offenders are assessed during intake and again upon transfer between facilities for their risk of being sexually abused by or abusive toward other offenders. Intake screening ordinarily takes place within 72 hours of arrival at the facility and again within a set time period, not to exceed 21 days from the offender's arrival at the facility.

C) The facility uses an objective screening instrument. The intake assessments submitted verified the department PREA risk screening instrument includes(1) Whether the inmate has a mental, physical, or developmental disability; (2) The age of the inmate; (3) The physical build of the inmate; (4) Whether the inmate has previously been incarcerated; (5) Whether the inmate's criminal history is exclusively nonviolent; (6) Whether the inmate has prior convictions for sex offenses against an adult or child; (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; (8) Whether the inmate has previously experienced sexual victimization; (9) The inmate's own perception of vulnerability; and (10) Whether the inmate is detained solely for civil immigration purposes.at a minimum:

D) The intake screening considers, 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; 2. The age of the inmate; 3. The physical build of the inmate; 4. Whether the inmate has previously been incarcerated; 5. Whether the inmate's criminal history is exclusively nonviolent; 6. Whether the inmate has prior convictions for sex offenses against an adult or child; 7. Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; 8. Whether the inmate has previously experienced sexual victimization; 9. The inmate's own perception of vulnerability; and 10. Whether the inmate is detained solely for civil immigration purposes.

E) The auditor reviewed criteria for assessments, the assessment used meets the elements of the standard by having possible victim factors and possible aggressor factors. The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing inmates for risk of being sexually abusive.

F. Within a set time period, not to exceed 30 days from the inmate's arrival at the facility, the facility reassesses the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening.

G) AR 573 states All offenders will be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that could



impact the offender's risk of being sexually victimized or sexually abusive. Offenders shall not be disciplined for refusing to answer or for failing to disclose complete information in response to questions asked on the intake screening related to: Any mental, physical, or developmental disability. Whether the offender is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming. Whether or not the offender has previously experienced sexual victimization; or the offender's own perception of vulnerability.

H) Inmates are not required but are encouraged to participate in the PREA questionnaire and cannot be disciplined for not taking part.

I) All staff are prohibited from the dissemination of any of the PREA screening for risk of victimization and abusiveness except on a need and right-to-know basis. The Reports of the unauthorized dissemination of confidential information shall be investigated and may result in disciplinary action up to and including termination.

The auditor observed a mock demonstration of the intake process where the PREA risk screening is administrated by designated intake staff and medical staff. The screening takes place in the intake area that allows for privacy and sensitive information to be discussed. Staff ask screening questions in a manner that fosters comfort and elicit responses. Intake staff use a screening tool to collect information during the risk screening process. Staff ask questions about offenders' sexual orientation and gender identity by asking if they identify as LGBTI as well as making a subjective determination about perceived status. Staff utilize other forms of documentation to complete the full risk assessment.

Informal conversations with staff confirm their understanding of the risk screening process.

The auditor was able to observe the physical storage and electronic storage of the risk assessments, medical records, and sexual abuse allegation reports. The physical storage was secured under lock and key. Electronic records are password protected with restricted and limited access.

Informal conversations with staff verified that records are securely stored and access to electronic information is highly restricted on a need-to-know basis.

According to interviews, offenders are screened at time of admission or within 24 hours to the facility for risk of sexual abuse victimization or sexual abusiveness toward other offenders. A standardized set of questions is utilized. Only case workers, investigators, Inspector General Investigators and upper-level managers have access to risk assessments. Risk levels are reassessed every six months. Information is used to determine risk, safety planning and housing/bed assignments. Placement and programming assignments for transgender and intersex offenders are completed every six months. Transgender and intersex offenders are given the opportunity to shower separately. Medical and mental health follow-ups and post screening occur within 14 days. Offenders recall being asked risk screening questions at time of

	<p>intake. The PCM and PC are aware that only case workers have access to the risk of screening.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.42</b>	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.42 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1, The assessment flow chart</li> <li>2. Bed roster that identifies offenders that are possible victims or possible aggressors</li> <li>3. PREA incident summary from the transgender intersex review committee</li> <li>4. Samples of offender or intersex questionnaires</li> <li>5. Interviews with medical and mental health staff; risk screeners; Warden; PREA Coordinator (PC); PREA Compliance Manager (PCM); five transgender offenders; and three offenders that identified as gay/lesbian/bisexual. There were no offenders held in isolation.</li> <li>6. Memo on showers for transgender offenders</li> <li>7. Transgender Intersex review committee</li> <li>8. Eight samples of offender or intersex questionnaires</li> <li>9. OP 504 policy</li> <li>10. AR 573 policy</li> </ol> <p>Findings:</p> <p>115.42 Use of screening information.</p> <p>A) OP 504 states: Staff shall use information from the PREA Risk Assessment to make informed housing/bed. Staff shall use information from the PREA Risk Assessment to make informed housing/bed assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexual predators. Staff shall make individualized determinations about how to ensure the safety of each inmate.</p> <p>B) AR 573 states staff will use information from the risk assessment to make informed housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. Staff shall make individualized determinations about how to ensure the safety of each inmate.</p> <p>C) In deciding whether to assign a transgender or intersex residents to a facility for</p>

	<p>male or female residents, and in making other housing and programming assignments, the agency considers on a case-by-case basis whether a placement would ensure the offenders health and safety, whether the placement would present management or security risks. I reviewed 1 file from the Transgender-Intersex review committee meeting.</p> <p>D) AR 573 requires placement and programming assignments for each transgender or intersex residents shall be reassessed at least twice each year to review any threats to safety experienced by the residents. An individualized assessment will be completed on offenders who identify as transgender or intersex by utilizing confidential document Transgender or Intersex Offender Questionnaire at intake, the 21-day follow-up, when new information is presented and at the 6-month wellness review.</p> <p>E) A transgenders own views with respect to their safety will be given serious consideration.</p> <p>F) Transgender and intersex inmates are given the opportunity to shower separately from other inmates. Memo from the PREA Compliance manager states: Transgender and intersex offenders shall be given the opportunity to shower separately from other offenders. Transgender or Intersex offender can request a review for a separate shower plan. Institutions and facilities will implement a shower plan so long as they are able to accommodate the request and there are no safety and security concerns. Any deviations from the plan will be documented. Institutions and facilities may temporarily deviate from a shower plan in exigent circumstances.</p> <p>G) The agency shall not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such 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 such inmates. G is not applicable the facility does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status.</p> <p>According to interviews and observation, the facility does not have a housing unit solely for LGBTI offenders. The PCM was able to explain how information is used from the risk screening. The agency considers whether the placement of a LGBTI offender will ensure the offenders health and safety and if it would present management or security problems. Placement and programming assignments for each transgender or intersex offender is reassessed every six months and upon a report or concern.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.43</b>	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

	<p>115.43 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. Operating procedures</li> <li>2. AR 573 policy</li> <li>3. Pre-audit questionnaire (PAQ) stating they have not placed any offender in isolation due to risk of sexual abuse.</li> <li>4. Interview with the Warden. There were no offenders held in segregated housing for having a high risk of sexual victimization.</li> </ol> <p>Findings:</p> <p>115.43 Protective custody.</p> <p>A) AR 573 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. There were (0) number of inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months.</p> <p>B) AR 573 states inmates 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.</p> <p>C) AR 573 state Inmates at high risk for sexual victimization will 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 inmate in involuntary segregated housing no more than 24 hours while completing the assessment. This assessment will determine if an immediate institutional bed move will alleviate the issue. If not, the inmate will be given a Notice for Placement in Administrative Segregation and will be seen by the Caseworker within 72 hours to determine the appropriate placement of the inmate. This review will include a reassessment using the PREA Risk Assessment instrument.</p> <p>D) AR 573 states Inmates placed in segregated housing will document the basis for the facility's concern for the inmate's safety; and the reason why no alternative means of separation can be arranged.</p> <p>E) AR 573 states the inmate will be reviewed every 30 days.</p> <p>According to interviews, offenders are not held in segregated housing due to having a high risk of sexual victimization.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard

## Auditor Discussion

115.51 Evidence analyzed:

1. The training curriculum on PREA reporting
2. PREA posters in English and Spanish
3. Intergovernmental agreement with the state of New Mexico for accepting PREA allegations
4. New Mexico report form
5. PREA policy
6. "PREA at a Glance" form that outlines 1st responder duties and how to report a PREA allegation
7. Attendance records
8. Site review observations
9. Testing documentation
10. Interviews with random staff; random offenders; and the PREA Compliance Manager (PCM)
11. Offender handbook
12. Website review for staff reporting

Findings:

115.51 Inmate reporting.

A) The Department policy provides multiple ways for offenders to report allegations of sexual abuse, sexual harassment, or retaliation by other offenders or staff for reporting or cooperating with an investigation related to PREA, or any staff negligence or violation of responsibilities that may have contributed to sexual assault or sexual harassment.

- a. Verbally report to any staff member, contractor, or volunteer;
- b. A written report submitted via any staff member, contractor, or volunteer;
- c. Filing a grievance, or
- d. Calling the PREA hotline

B) The facility provides at least one way for offenders to report abuse or harassment to a public or private entity or office that is not part of the agency, and that is able to receive and immediately forward offender reports of sexual abuse and sexual harassment to agency officials, allowing the offender to remain anonymous upon request. The facility does not detain offenders solely for civil immigration purposes. Offenders may report anonymously or otherwise to an outside public agency (New Mexico Department of Correction), which is able to immediately report to the Department complaints from offenders about sexual abuse, sexual harassment, or retaliation by staff or other offenders. Written notification to offenders of the outside public agency identifiers is included on PREA posters placed in all housing units, work, and program areas, and within the written intake/reception offender orientation packet. Offenders can write directly to the New Mexico Department of Corrections or request the outside agency reporting form.

C) All staff are required to report immediately without reservation any corrupt or

unethical behavior which could affect either offenders, employees or the integrity of the Department of Corrections any knowledge, suspicion, or information regarding any incidents of sexual abuse, sexual harassment or retaliation that occurred inside or outside of the facility to their immediate supervisor, another supervisor, warden, or inspector general. In the event the allegations of sexual abuse or sexual harassment concern is the immediate supervisor the report shall be made to another supervisor, warden, or OIG. Staff shall privately report sexual abuse and sexual harassment incidents to supervisory staff. Staff can report either in person, by telephone, email or via the NDOC website, PREA incident report form. No other person shall be in the vicinity of hearing the reporting information. Staff shall not reveal any information related to the report to anyone other than to the extent necessary as specified in department policy.

PREA Audit Notices are posted abundantly and visible to staff, offenders, and visitors. Notices are posted in each unit, culinary, lobby, administration area, intake, and other areas throughout the facility. Emotional support services information is posted in each unit, lobby, administration area, and other areas throughout the facility. Phones were accessible to offenders. Reporting sexual abuse/sexual harassment information is posted in each unit, lobby, administration area, and other areas throughout the facility. Civil immigration is not applicable to this facility. Third party reporting information is posted in each unit, public lobby, and other areas frequented by offenders, staff, visitors and contractors. It is also located on the agency website. Other PREA signage, such as zero tolerance information are available in each unit. This information is readily available throughout the facility. The PREA flyer is in all units.

Electronic reporting methods are not available to offenders. Staff and third-party electronic reporting are available on the agency's website.

Informal conversations with staff and offenders were held during the facility tour. All stated that PREA information is readable and accessible, contains consistent and accurate information, and always posted.

The Audit Notice has been posted for several weeks and offenders pointed out that the Notice contains the date it was posted.

The auditor was able to observe the physical storage and electronic storage of the risk assessments, medical records, and sexual abuse allegation reports. The physical storage was secured under lock and key. Electronic records are password protected with restricted and limited access.

Informal conversations with staff verified that records are securely stored and access to electronic information is highly restricted on a need-to-know basis.

Each unit contains written materials, and a secure drop box is available. The boxes are checked on weekdays by designated staff. Boxes can be used for any note,

	<p>grievance or concern. Mail is picked up from units on weekdays and mailed out. Mail is not read but is checked for contraband prior to sending and receiving.</p> <p>Informal conversations with staff regarding the process of sending and receiving mail to/from the external reporting entity, outside emotional support services, and legal mail were unremarkable. Staff understood which mail is to remain private and confidential. Staff are also aware of having writing tools available and that designated staff check the locked boxes every weekday.</p> <p>Multiple internal ways of reporting were observed. Offenders are provided with paper/ forms, pencils (upon request), envelopes and secure boxes to report in writing in each unit. Boxes are checked by designated staff on weekdays. An offender was asked to walk the auditor through the internal reporting by writing process.</p> <p>The facility does not have a process for offenders to report electronically.</p>
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<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>115.52 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. Pictures of the PREA posters in English and Spanish</li> <li>2. Statement that the facility has had six grievances that concerned PREA issues in the last 12 months.</li> <li>3. AR 421 PREA policy</li> <li>4. Site review observations</li> <li>5. Testing documentation</li> <li>6. Interviews with four offenders who reported sexual abuse</li> <li>7. OP 740 Offender Grievance policy</li> <li>8. AR 707 Disciplinary Sanctions</li> <li>9. Website review</li> </ol> <p>Findings:</p> <p>115.52 Exhaustion of administrative remedies.</p> <p>A) The agency has a grievance policy. The offender grievance process is a means that offenders can utilize to make a report of sexual abuse or sexual harassment by a staff member or another offender. Any grievance that has an allegation or report related to sexual abuse must be accepted without constraints.</p> <p>B) AR 421 states: Any grievance that has an allegation or report related to sexual abuse must be accepted without constraints, including grievances that are outside the accepted time frames for a filed grievance shall be accepted for any portion of</p>

the grievance that has a claim of sexual abuse; The grievance process shall not be required to resolve or attempt to resolve the grievance with the accused staff member for any claim of sexual abuse; The grievance shall not be referred to the accused or named staff member; and, Grievances received by staff members that involve a family member or other staff that they have a close or intimate relationship with will be immediately forwarded to an impartial and designated staff member for review, response, and/or action. The grievance should be confidential and may be submitted to the facility head, PREA compliance manager, or PREA coordinator for review and appropriate referral. It should not be submitted or referred to the subject of the investigation.

C) AR 421 states: Grievances that are outside the accepted time frames for a filed grievance shall be accepted for any portion of the grievance that has a claim of sexual abuse; The grievance process shall not be required to resolve or attempt to resolve the grievance with the accused staff member for any claim of sexual abuse; The grievance shall not be referred to the accused or named staff member; and, Grievances received by staff members that involve a family member or other staff that they have a close or intimate relationship with will be immediately forwarded to an impartial and designated staff member for review. Any grievance filed by another offender on behalf of the victim when sexual abuse is reported will be accepted and allowed to continue until a response from the IG's Office. At any level that a grievance is filed with a claim or report of sexual abuse, that grievance will be scanned and emailed for review to the OIG, PREA Management Division.

D) AR 421 States: A final decision on the merits of any portion of a grievance is required within 90 days of receiving the grievance. Computation for the 90-day time period does not include time consumed by the resident in preparing an appeal. An extension may be granted based on normal grievance procedures. If an extension is granted, notify the resident in writing and provide a date when the final decision will be made.

E) Any grievance filed by another offender on behalf of the victim when sexual abuse is reported will be accepted and allowed to continue until a response from the IG's Office. Third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, can assist the resident submitting the grievance. Third parties may submit such allegations on behalf of an resident. Third parties are not required to use the standard grievance form when submitting an PREA grievance. If the alleged victim denies the allegation, declines to participate, and there is no evidence to support it, the allegation will be deemed unfounded and closed.

F) AR 421 states: At any time, an inmate may file an Emergency Grievance for issues involving substantial risk of imminent sexual abuse. All Emergency Grievances alleging substantial risk of imminent sexual abuse shall be forwarded to the highest-ranking staff member on duty so that corrective action may be taken immediately

G) AR 421 States: The Department, institutions, and facilities are prohibited from applying disciplinary action against an offender for filing any level of a grievance unless it is clearly demonstrated and documented that the offender filed the



	<p>grievance in bad faith.</p> <p>Third party reporting information is posted in each unit, public lobby, and other areas frequented by offenders, staff, visitors and contractors. It is also located on the agency website. Staff and third-party electronic reporting are available on the agency's website. The auditor placed a call using the dedicated phone line. This was a free call, available on demand and answered by operators. Bilingual staff and translation services are available.</p> <p>According to interviews, offenders understand how to report sexual abuse and sexual harassment.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.53</b>	<b>Inmate access to outside confidential support services</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>115.53 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. Pictures of PREA posters in English and Spanish</li> <li>2. Copy of an offender ID that has information on who and how to report a PREA allegation</li> <li>3. Samples of the advocacy request form offenders filled out.</li> <li>4. AR 421 policy</li> <li>5. Contract with Signs of Hope.</li> <li>6. Memo from the PREA Coordinator (PC)</li> <li>7. Community questionnaire</li> <li>8. Site review observations</li> <li>9. Interviews with random staff; PREA Compliance Manager (PCM); Warden and four offenders who reported sexual abuse.</li> <li>10. Advocacy Request Form</li> </ol> <p>Findings:</p> <p>115.53 Inmate access to outside confidential support services.</p> <p>A) AR 421 States: The facility provides offenders with access to outside victim advocates for emotional support services related to sexual abuse by giving offenders mailing addresses and telephone numbers, including toll-free hotline numbers for victim advocate Signs of Hope organizations.</p> <p>Memo from the PREA Coordinator stating: Signs of Hope provides outside community victim advocacy for ongoing emotional support for offender victims of sexual abuse.</p>

Currently they are the only State of Nevada victim advocacy organization providing emotional support services to incarcerated persons in our care.

B) AR 421 States: These services offered to offender victims from an outside agency are not connected to a law enforcement agency and are at a comparable level of confidentiality as a nongovernmental entity that provides similar victim services. The institution or facility informs offenders, 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 in accordance with mandatory reporting laws.

C) The Department, institutions, and facilities will provide offenders with access to outside victim advocates for emotional support services related to sexual abuse. Information on how to contact the community rape crisis center is posted within housing units and intake orientation packets.

Privileged Mail between an inmate and the following person(s): (1) State and local elected officials; (2) State officials appointed by the Governor; (3) Attorney listed with a State Bar Association, a recognized legal assistance agency, or an attorney representative; (4) Diplomatic personnel; (5) The Rape Crisis Center (RCC); (6) Sexual Assault Support Services (SASS); and (7) communication deemed privileged through a court order.

Memo from the PREA Coordinator. Effective immediately Institutions and Facilities will utilize Advocacy Request Forms DOC 1919-1 (English) or DOC 1919-2 (Spanish) when an offender reports an incident of sexual abuse in confinement (new report). These forms were developed to support compliance with the above standards and the Nevada Sexual Assault Survivors Bill of Rights. These new forms will ensure offender victims of sexual abuse understand their right to request support from the community victim advocate during the sexual assault forensic exam (if applicable), during the investigation interview, and ongoing emotional support. It is the responsibility of the PCM to include information in the Coordinated Response procedure, ensure Supervisors and CCS staff have received training on the use of the form, and provide the form to the PCM. If the offender victim would like the advocate during the investigation interview, the PREA Management Division must be contacted. The OIG will make every effort to accommodate, however, may not always be practical due to limited victim advocates available from Signs of Hope and geographical location. If the offender victim states "yes" and they want to learn more about advocacy, the PCM or designee is responsible to email or fax DOC 1919 to Signs of Hope, Marissa Pons. Offender victims will be provided a copy of DOC 1919 unless they decline the offer to maintain a copy.

Emotional support services information is posted in each unit, lobby, administration area, and other areas throughout the facility. Phones were accessible nearby.

Each unit contains written materials and a secure drop box. The boxes are checked on weekdays by designated staff. Boxes can be used for any note, grievance or concern. Mail is picked up from units on weekdays and mailed out. Mail is not read but is

	<p>checked for contraband prior to sending and receiving.</p> <p>Informal conversations with staff regarding the process of sending and receiving mail to/from the external reporting entity, outside emotional support services, and legal mail were unremarkable. Staff understood which mail is to remain private and confidential. Staff are also aware of having writing tools available and that managers check the locked boxes every weekday.</p> <p>Signs of Hope phone number is provided on postings throughout the facility to include each unit. Calls are free, unmonitored, and no PIN number is required. The auditor made a test call to Signs of Hope and completed the community advocacy questionnaire. The phone was answered by a live person. The provider was prepared to offer services. Signs of Hope have bilingual staff available as well as language assistance services. Signs of Hope stated that the information shared is confidential.</p> <p>The HOPE mailing address is also provided on posters throughout the facility to include each unit. Paper, pencils, envelopes and free postage is provided in each unit. Mail is sent out on weekdays.</p> <p>Informal conversations with staff and offenders confirm their access to Signs of Hope, telephones and writing materials.</p> <p>According to interviews, most offenders were aware that services are available outside the facility for dealing with sexual abuse. Offenders are aware of signage posted in the units and other areas of the facility containing phone numbers and addresses to outside services and most offenders knew that they could speak privately to this service. The facility allows offenders to see or speak to attorneys privately. The facility allows offenders to see or speak to parents or legal guardians during designated times. Offenders have unmonitored, unlimited phone calls with attorneys. Offenders have in-person, phone and mail contact with approved visitors. Signage states the call is confidential and free. Offenders understand that they can call their attorney and approved visitors if they choose.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.54 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. Link on the IGs website for anonymous 3rd party reporting of a PREA issue</li> <li>2. Photos of posters that explain the zero-tolerance policy and how to report PREA allegations</li> <li>3. AR 421 PREA policy</li> </ol>

	<p>4. Site review observations</p> <p>Findings:</p> <p>115.54 Third-party reporting.</p> <p>A) AR 421 state: The Department provides a method for third parties to report sexual abuse and sexual harassment on behalf of an offender. Information on how to report sexual abuse and sexual harassment on behalf of an offender. The IGs website states:</p> <p>It is the vision of the PREA Management Team to give a means to report sexual abuse and/or harassment. The PREA Management Team is committed to ensuring offenders and staff are held accountable for their actions if they engage in sexual abuse and/or harassment of offenders or staff; train staff and offenders regarding sexual abuse and/or harassment in prison; and educate Staff and offenders on the Department's Zero Tolerance Policy. If you wish to make an anonymous complaint or report information, contact the PREA Management Division by mail, email or phone. Office of the Inspector General, PREA Management Division P.O. Box 7011 Carson City, NV 89702 (775) 977-5587</p> <p>Third party reporting information is posted in each unit, public lobby, and other areas frequented by offenders, staff, visitors and contractors. It is also located on the agency website. The auditor placed a call using the dedicated phone line. This was a free call, available on demand and answered by a voice mail in which you leave a message. Bilingual staff and translation services are available.</p> <p>The facility meets compliance with this standard.</p>
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115.61	Staff and agency reporting duties
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>115.61 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. OP 421 PREA policy</li> <li>2. OP 332 Employee Reporting Responsibility</li> <li>3. OP 457 policy</li> <li>4. Staff PREA training curricula</li> <li>5. Staff training records</li> <li>6. Signed PREA training acknowledgments</li> <li>7. PREA at a glance handout</li> <li>8. Site review observations</li> <li>9. Interviews with PREA Coordinator (PC), medical and mental health staff, random staff, and the Warden.</li> </ol>

10. Testing documentation
11. Adult Protective Services report form
12. Suspected Child Abuse report form
13. State Law related to abuse and reporting

Findings:

115.61 Staff and agency reporting duties.

A) The PREA policy states all staff are required to immediately report 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 department; retaliation against offenders or staff who reported such incidents; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. All staff are required to report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports through their facility chain of command and/or OIG, PREA Management Division. In the event that the allegations of sexual another abuse or sexual harassment concern the staff member's immediate supervisor, the report shall be made to supervisor, Warden, or OIG.

B) AR 421 state: 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 specified in Department policy, to make treatment, investigation, and other security and management decisions.

C) AR 421 State: Medical and mental health practitioners shall report all allegations of sexual abuse and sexual harassment and inform offenders of the practitioner's mandatory duty to report, and the limitations of confidentiality, at the initiation of services.

D) AR 421 states: 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 specified in Department policy, to make treatment, investigation, and other security and management decisions.

AR 345 states: All Department staff, volunteers, educational staff and/or contract service providers are required to disclose, in writing within one (1) working day of becoming aware of relationships prohibited by this policy. Any and all personal relationships they have or have had with any persons under the supervision of the Department or under the jurisdiction of a criminal justice agency. Any and all personal relationships they develop during their tenure with the Department. Contact under any circumstances will be immediately reported via the normal chain of command, during normal working hours. If after normal working hours, no later than the beginning of the next work shift. Incidental contacts, such as church groups and school activities, do not need to be reported. Any person who becomes aware of or has reasonable belief that another person is involved in an unauthorized relationship and/or is unduly familiar with an offender shall immediately report via their chain of command.

	<p>According to interviews, offenders are advised by medical and mental health staff at the initiation of services regarding limitations of confidentiality and their duty to report. All staff are mandatory reporters. Medical and mental health staff are not aware of any disclosures that required to be reported. Attorneys are generally notified within 72 hours. The Warden also stated that allegations are reported directly to the facility investigators.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.62</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.62 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. AR 421 PREA policy</li> <li>2. Pre-audit questionnaire (PAQ)</li> <li>3. Interviews with the Director, Warden and random staff.</li> </ol> <p>Findings:</p> <p>115.62 Agency protection duties.</p> <p>A) AR 421 The PREA policy requires when the Department, institution, or facility learns that an offender is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the offender.</p> <p>According to interviews, staff understand that immediate action is required to protect offenders at risk of imminent sexual abuse.</p> <p>The facility meets compliance with this standard.</p>

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.63 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. AR 421 PREA Manual</li> <li>2. Pre-audit questionnaire (PAQ)</li> <li>3. Interviews with the Director and the Warden</li> <li>4. Warden to Warden Notifications</li> </ol>

	<p>Findings:</p> <p>115.63 Reporting to other confinement facilities.</p> <p>A) Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the facility head that received the allegation notifies the head of the facility or appropriate office of the agency where the alleged abuse occurred.</p> <p>B) AR 421 States: Within 72 hours of the offender reporting, the Warden will complete and send the written notification. When the Department, institution, or facility receives such notifications, they shall ensure that the allegation is investigated if not already investigated.</p> <p>C) The facility documents that it has provided such notification. The facility submitted 4 notices of The LCC Warden reporting an allegation to another facility and 1 notification of from another facility to the LLC Warden.</p> <p>D) The facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards.</p> <p>According to interviews, reports from other facilities are thoroughly investigated.</p> <p>The facility meets compliance with this standard.</p>
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115.64 Staff first responder duties	
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>115.64 Document's reviewed:</p> <ol style="list-style-type: none"> <li>1. AR 421 PREA Manual</li> <li>2. Training curriculum</li> <li>3. PREA at a Glance form that outlines 1st responders' duties.</li> <li>4. Pre-audit Questionnaire (PAQ)</li> <li>5. Staff first responder wallet cards</li> <li>6. Interviews with first responders, and random staff, and four offenders who reported sexual abuse.</li> </ol> <p>Findings:</p> <p>115.64 Staff first responder duties.</p> <p>A) AR 421 states: Upon learning of an allegation that an offender was sexually abused, the first security staff member to respond to the report shall: Separate the alleged victim and abuser; Preserve and protect any crime scene until appropriate</p>

	<p>steps can be taken to collect any evidence; If the abuse occurred within a time period (96 hours) that still allows for the collection of physical evidence, request that the alleged victim ensures that the alleged abuser does not take any action that could destroy physical evidence including as appropriate: Washing/showering, brushing teeth, changing clothes, urinating, defecating, drinking or eating.</p> <p>B) AR 421 states: If the first staff responder is not a custody staff member, the first responder shall request that the alleged victim does not take any actions that could destroy physical evidence, and then immediately notify the first custody staff member available.</p> <p>According to interviews, security staff, non-security staff and random staff were able to describe all actions to be taken as a first responder in for allegation of sexual abuse. Staff respond as soon as the allegation is made. Offenders who reported sexual abuse were able to see medical and mental health. Staff are provided a wallet size first responder card that list all steps needing to be taken in the case of a sexual assault allegation.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.65</b>	<b>Coordinated response</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>115.65 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. The coordinated response plan outlying responsibilities related to a PREA incident for all staff in the facility.</li> <li>2. Offender victim interview forms</li> <li>3. Shift commanders coordinate response guide</li> <li>4. AR 421 PREA Manual</li> <li>5. Interview with the Warden</li> </ol> <p>Findings:</p> <p>115.65 Coordinated response.</p> <p>A) AR 421 PREA policy require all institutions and facilities will develop and follow a coordinated response procedure for reported incidents of sexual abuse. The procedure will include staff first responders, medical and mental health practitioners, investigators, and facility leadership. Procedures will include the custody supervisor utilizing Coordinated response forms.</p> <p>According to interviews, the facility coordinated response plan is in policy. The facility meets compliance with this standard.</p>



<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.66 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. AR 421 PREA Manual</li> <li>2. AFSCME and Fraternal Order of Police collective bargaining agreements.</li> <li>3. A memo from the PREA Coordinator (PC)</li> <li>4. Interview with the Director</li> </ol> <p>Findings:</p> <p>115.67 Agency protection against retaliation.</p> <p>.A) AR 421 PREA policy States: Neither the agency nor any other governmental entity responsible for collective bargaining on the agency's behalf shall enter into or renew any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any offenders pending the outcome of an investigation or of a determination of whether, and to what extent, discipline is warranted. Nothing in this standard shall restrict the entering into or renewal of agreements that govern: The conduct of the disciplinary process, as long as such agreements are not inconsistent with the evidentiary standard for administrative investigations and disciplinary sanctions for staff outlined in standard or whether a no-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated. A memo from the PREA Coordinator stated the State of Nevada American Federation of State, County, and Municipal Employees (ASCME). Local 4041 agreement 7/1/2023 – 6/30/2025 allows for the agency to remove alleged staff sexual abuses from contact with offenders pending investigation.</p> <p>According to interviews, the facility has a contract with the State of Nevada American Federation of State, County, and Municipal Employees (ASCME) that does not restrict the agency from removing the alleged staff member pending investigation.</p> <p>The facility meets compliance with this standard.</p>

<b>115.67</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

115.67 Evidence analyzed:

1. AR 421 PREA Manual

3. Interviews with the Director, Warden, designated staff charged with monitoring retaliation, and four offenders who reported sexual abuse. At the time of audit there were no offenders held in segregated housing (for risk of sexual victimization/who alleged to have suffered sexual abuse).

Findings:

115.67 Agency protection against retaliation.

A) AR 421 states: The facility has a procedure to protect all offenders and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other offenders or staff.

B) The facility employs multiple protection measures, such as housing changes or transfers for offender victims or abusers, removal of alleged staff or offender abusers from contact with victims, and emotional support services for offenders or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. The PCM or designee monitoring will include reviewing: offender disciplinary reports, housing or program changes, negative performance reviews, or reassignments of staff.

C) The facility monitors for at least 90-days and will continue past 90 days if the need continues. In instances of offender transfer at any point in the retaliation monitoring process, the sending facility PREA Compliance Manager will notify the receiving facility of the 90day retaliation monitoring. This notification will be made via the telephone with a follow-up e-mail to the PCM at the receiving facility. This e-mail should be maintained, for audit purposes, as proof of notification. The sending facility PREA Compliance Manager will maintain the offender on their PREA retaliation monitoring log to ensure that the retaliation monitoring is completed. The PREA Compliance Manager will follow up with the PREA Compliance Manager at the Receiving Facility, in 30, 60, and 90 days, to ensure the required monitoring has been completed.

D) AR 421 states: In the case of offenders, such monitoring shall also include periodic status checks.

E) AR 421 states: If any other individual who cooperates with an investigation expresses a fear of retaliation, the Department, institution, or facility shall take appropriate measures to protect that individual against retaliation.

F) AR 421 states: The obligation to monitor will terminate if the Department determines that the allegation is unfounded. The 90-day monitoring will continue past 90 days if the need continues.

According to interviews, retaliation is monitored weekly. Contact with offenders who have reported sexual abuse is initiated. Monitoring will last 90 days or longer. A retaliation questionnaire will be completed. Offenders feel protected enough against

	<p>retaliation.</p> <p>The facility meets compliance with the standard.</p>
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<b>115.68</b>	<b>Post-allegation protective custody</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>115.68 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. AR 421 PREA Manual</li> <li>2. Pre-audit questionnaire (PAQ)</li> <li>3. Interviews with the Warden and staff who supervise segregated housing. At the time of audit there were no offenders held in segregated housing (for risk of sexual victimization/who alleged to have suffered sexual abuse).</li> </ol> <p>Findings</p> <p>115.68 post-allegation protective custody.</p> <p>A) AR 421 PREA policy requires all institutions and facilities will develop, implement, and periodically review policies to strictly prohibit any offender who is or was at high risk for sexual victimization from being placed into involuntary segregated housing unless: An assessment has been done and a determination made and documented that there is no available alternative means for housing the offender who is or was or is at high risk for sexual victimization from an abuser.</p> <p>All placements of offenders into involuntary segregation for being a victim or a risk of victimization will be documented in NOTIS and shall clearly demonstrate the basis for the reason why no alternative was available. The institution or facility may place the offender in involuntary segregated housing for less than 24 hours while completing the assessment. Institution and facility procedures and practice involving involuntary segregated housing shall include for the offenders, to the extent possible, access to programs, privileges, education, and work opportunities. The institution or facility will document in NOTIS the opportunities that have been limited, the duration of the limitation, and the reason why the limitation.</p> <p>Any offender placed into involuntary segregation due to having been a victim or at risk of victimization shall only remain in involuntary segregation only until an alternative housing arrangement is made but shall not ordinarily exceed 30 days. Any offender placed into involuntary segregation due to being a victim or a risk of victimization shall provide for a 30-day review to determine and document the continued need for separation from the general population, if applicable.</p>

	<p>Stated in the PAQ, no offenders have been placed in protective custody after an allegation of sexual abuse or harassment or is at risk for sexual abuse in the last 12 months.</p> <p>According to interviews, segregated housing is not utilized for offenders at risk of sexual victimization or who are alleged to have suffered sexual abuse.</p> <p>The facility is in compliance with this standard.</p>
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<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>115.71 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. Six-page pamphlet "standard in focus" for investigations</li> <li>2. PREA investigation guide</li> <li>3. Laws for the State of Nevada</li> <li>4. Site review observation of physical storage</li> <li>5. Interviews with investigators, Warden, PREA Coordinator (PC), PREA Compliance Manager (PCM) and four offenders who reported sexual abuse.</li> <li>6. The PREA investigation tracking log</li> <li>7. Fourteen (14) completed investigations, completed by trained investigators</li> <li>8. 115.71 The IG administrative guide</li> <li>9. Pre-audit questionnaire (PAQ)</li> <li>10. Investigators PREA training records</li> </ol> <p>Findings:</p> <p>115.71 Criminal and administrative agency investigations.</p> <p>.A) The Department Office of the Inspector General Criminal Investigators are responsible for investigating all allegations of staff-on-offender sexual abuse and sexual harassment and offender-on-offender sexual abuse. 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. The protocol is developmentally appropriate for youth and is adapted from 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.</p>

B) The Warden or designee is responsible for assigning a facility supervisor who has completed specialized training to conduct offender-on-offender sexual harassment investigations as assigned by the Office of the Inspector General. Investigations will be completed promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. All investigators were trained in conducting investigating sexual abuse in a confinement statement. Reviewed the training curricular and signed certificates.

C) Investigators gather and preserve direct and circumstantial evidence, including: Any available physical and DNA evidence; Any available electronic monitoring data; Shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrators.

D) When the quality of evidence appears to support a criminal prosecution, the assigned criminal investigator shall conduct compelled interviews only after consulting with the Nevada Attorney General as to whether compelled interviews may be an obstacle to subsequent criminal prosecution.

E) The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as an offender or staff. The Department does not require an offender who alleges sexual abuse to submit to a polygraph examination or other truth-telling devices as a condition of proceeding with the investigation of such an allegation.

F) Administrative investigations shall include an effort to determine whether staff actions or failures to act contributed to the abuse and be documented in written reports to include a description of the physical, and testimonial evidence, and the reasoning behind credibility assessments and investigative facts and findings.

G) Criminal investigations are documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence with copies of all documentary evidence attached, where feasible. The Department shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

H) Substantiated sexual abuse and/or sexual harassment allegations of conduct that appear to be criminal will be referred to the Attorney General's Office.

I) The IGs office conducts sexual abuse investigations.

J) The departure of the alleged abuser or victim from employment or control of the facility or agency shall not provide a basis for terminating an investigation.

(K) (L) The IGs office conducts sexual abuse investigations.

The auditor was able to observe the physical storage and electronic storage of the risk assessments, medical records, and sexual abuse allegation reports. The physical

	<p>storage was secured under lock and key. Electronic records are password protected with restricted and limited access.</p> <p>Informal conversations with staff verified that records are securely stored and access to electronic information is highly restricted on a need-to-know basis.</p> <p>According to interviews, investigative staff received training specific to conducting sexual abuse and an allegation of sexual abuse or sexual harassment. The first step in initiating an investigation is to assure first responder duties have been completed and proper notifications have been made. Investigators were able to thoroughly describe the investigation process. Anonymous and third-party reports are handled in the same manner as all other investigations. All direct and circumstantial evidence would be collected and preserved. When evidence is discovered that a prosecutable crime may have taken place, prosecutors are consulted. Polygraphs are not utilized. Investigations continue to be completed regardless of if the staff member terminates employment or the alleged victim leaves the facility. Investigations will not terminate should a victim recant his/her allegation. Administrative and criminal investigations are documented in written reports. A preponderance of the evidence is required to substantiate allegations of noncriminal sexual abuse or sexual harassment. Victims are informed as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation.</p> <p>The facility meets compliance with this standard. sexual harassment investigations. Investigations are initiated right away following</p>
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115.72	Evidentiary standard for administrative investigations
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>115.72 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. OP 421 PREA Manual</li> <li>2. Interviews with investigators</li> <li>3. Investigative checklist for each step of the investigation</li> </ol> <p>Findings:</p> <p>115.72 Evidentiary standard for administrative investigations.</p> <p>A) 421 PREA policy states: The Department shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>According to interviews, the agency shall impose no standard higher than a preponderance of the evidence in determining whether criminal allegations of sexual</p>

	<p>abuse or sexual harassment are substantiated.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.73</b>	<b>Reporting to inmates</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>115.73 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. AR 421 PREA Manual</li> <li>2. Offender PREA Report Notification form</li> <li>3. Interviews with Warden, investigators and four offenders who reported sexual abuse.</li> <li>4. Pre-audit questionnaire (PAQ)</li> </ol> <p>115.73 Reporting to inmates.</p> <p>A) AR 421 PREA policy states that following an offender's allegation that a staff member has committed sexual abuse against the offender, and the allegation was shown to be substantiated the offender will be notified by the Department, institution, or facility whenever:</p> <ol style="list-style-type: none"> <li>a. The staff member is no longer posted within the offender's unit;</li> <li>b. The staff member is no longer employed at the facility;</li> <li>c. The Department learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or</li> <li>d. The Department learns that the staff member has been convicted on a charge related to sexual abuse within the facility.</li> </ol> <p>B. The IGs office conducts all PREA allegations.</p> <p>C) As evidenced of the notifications and the dAR 421 PREA policy states that following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the facility subsequently informs the inmate (unless the agency has determined that the allegation is unfounded) whenever:</p> <ol style="list-style-type: none"> <li>(1) The staff member is no longer posted within the inmate's unit;</li> <li>(2) The staff member is no longer employed at the facility;</li> <li>(3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or</li> <li>(4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.</li> </ol>

	<p>D) AR 421 PREA policy states that following an offender's allegation that they had been sexually abused by an offender and the allegation was shown to be substantiated the facility will subsequently inform the alleged victim whenever:</p> <ul style="list-style-type: none"> <li>a. The Department learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or</li> <li>b. The Department learns that the alleged abuser has been convicted of a charge related to sexual abuse within the facility.</li> </ul> <p>As evidenced by the notifications to the inmates on completed investigations. The facility documents all such notifications or attempted notifications on the Offender PREA Report Notification form.</p> <p>The facility's obligation to provide notification shall terminate if the offender is released from the Department's custody.</p> <p>According to interviews, offenders are notified of the outcome of the investigation upon a completed investigation.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>115.76 Evidence analyzed:</p> <ul style="list-style-type: none"> <li>1. AR 421 PREA Manual</li> <li>2. Prohibition and Penalties Policy</li> <li>3. Pre-audit questionnaire (PAQ)</li> </ul> <p>Findings:</p> <p>115.76 Disciplinary sanctions for staff.</p> <p>A) The 421 PREA policy states: Staff shall be subject to disciplinary sanctions up to and including termination for violating the Department's sexual abuse and sexual harassment policy.</p> <p>B) The 421 PREA policy states: Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse</p> <p>C) The 421 PREA policy states: Disciplinary sanctions against staff members for any violation of the agency's policy prohibiting acts of sexual abuse and sexual harassment (other than engaging in sexual abuse) against an offender will be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed against other staff</p>



	<p>members for comparable offenses in similar circumstances.</p> <p>D) The 421 PREA policy states: All terminations of any staff member for violations of the sexual harassment policy, or resignations by staff, who would have been terminated if not for their resignation, shall be reported to law enforcement agencies and any relevant licensing body. Unless the activity was clearly not criminal.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.77</b>	<b>Corrective action for contractors and volunteers</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>155.77 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. Negotiated Contract</li> <li>2. Pre-audit questionnaire (PAQ)</li> <li>3. Interview with the Warden</li> <li>4. AR 421 PREA Manual</li> </ol> <p>Findings:</p> <p>115.77 Corrective action for contractors and volunteers.</p> <p>A) AR 421 PREA policy states that any contractor or volunteer at LCC who engages in sexual abuse shall be prohibited from contact with inmates and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. activity was clearly not criminal, and to relevant licensing bodies.</p> <p>B) AR 421 PREA policy states that LCC shall take appropriate remedial measures and shall consider whether to prohibit further contact with inmates, in the case of any other violation of Departmental sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p>According to interviews, remedial measures would be taken against contractors and volunteers for any violation of agency PREA policies.</p> <p>The facility meets compliance with this standard.</p>

<b>115.78</b>	<b>Disciplinary sanctions for inmates</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>

115.78 Evidence analyzed:

1. AR 421 PREA Manual
2. Pre-audit questionnaire (PAQ)
3. Interviews with medical and mental health staff and the Warden.
4. Disciplinary actions reviewed
5. AR 707 Offender Discipline policy

Findings:

115.78 Disciplinary sanctions for inmates.

A) 421 PREA policy states that upon completion of an administrative investigation which results in a substantiated finding for offender-on-offender sexual harassment will result in administrative disciplinary charges in accordance with AR 707 offender discipline MJ50 sexual harassment.

B) 421 PREA policy states that the facility disciplinary hearing officer will ensure sanctions are 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.

C) 421 PREA policy states the disciplinary hearing officer shall consider whether an offender's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanctions, in any, should be imposed.

D) The facility offers mental health counseling.

E) 421 PREA policy states 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. The facility had 7 disciplinary actions with 6 being for sexual harassment against staff.

F) 421 PREA policy states 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.

G) As stated in the PAQ the agency prohibits sexual activity between inmates.

According to interviews, the facility offers therapy, counseling and other intervention services designed to address and correct the underlying reasons or motivations for sexual abuse. The facility does not require an offender's participation as a condition of access to any rewards-based behavior management system, programming or education. No isolation was observed. The Warden understands that offenders can be subjected to disciplinary sanctions for engaging in offender-on-offender sexual abuse.

The facility meets compliance with this standard.

115.81	Medical and mental health screenings; history of sexual abuse
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>115.81 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. AR 421 PREA Manual</li> <li>2. Mental health and medical referrals and follow-up</li> <li>3. Medical records release form</li> </ol> <p>Findings:</p> <p>115.81 Medical and mental health screenings; history of sexual abuse.</p> <p>A) AR 421 states that during the intake or reception screening that indicates an offender has experienced prior sexual victimization or has previously perpetrated sexual abuse, whether it occurred in an institutional setting or the community, staff shall ensure that the offender is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. In reviewing the mental health follow up all offenders were seen before the 14-day requirement.</p> <p>B) AR 421 states that during the intake or reception screening that indicates an offender has experienced prior sexual victimization or has previously perpetrated sexual abuse, whether it occurred in an institutional setting or the community, staff shall ensure that the offender is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. In reviewing the mental health follow up all offenders were seen before the 14-day requirement.</p> <p>C) This provision is not applicable as it applies specifically to jails.</p> <p>D) AR 421 states that any information related to sexual victimization or abusiveness that occurred in a confinement facility 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>E) AR 421 states that medical and mental health practitioners shall obtain informed consent from offenders before reporting information about prior sexual victimization that did not occur in a facility setting unless the offender is under the age of 18. The facility provided the documentation of a referral of medical and mental health review and the medical records release form.</p> <p>The auditor was able to observe the physical storage and electronic storage of the risk assessments, medical records, and sexual abuse allegation reports. The physical storage was secured under lock and key. Electronic records are password protected with restricted and limited access.</p> <p>Informal conversations with staff verified that records are securely stored and access</p>

	<p>to electronic information is highly restricted on a need-to-know basis. According to interviews, informed consent is required. Offenders that disclose prior sexual victimization at intake are offered to see medical or mental health.</p> <p>The facility meets compliance with this standard.</p>
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115.82	Access to emergency medical and mental health services
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>115.82 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. Memo from the PREA Coordinator (PC)</li> <li>2. Unusual Occurrence report</li> <li>3. Progressive note form</li> <li>4. Interviews with medical and mental health staff, first responders, and four offenders who reported sexual abuse</li> <li>5. AR 421 PREA Manual</li> <li>6. Contract with a PPO "Sierra Health Care Options"</li> </ol> <p>Findings:</p> <p>115.82 Access to emergency medical and mental health services.</p> <p>A) 421 PREA policy states that offender 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.</p> <p>B) 421 PREA policy states if no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, custody staff first responders shall take preliminary steps to protect the victim and immediately notify the appropriate medical and mental health practitioners.</p> <p>C) 421 PREA policy states that offender victims of sexual abuse, while incarcerated, shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.</p>

	<p>D) 421 PREA policy states that treatment services shall be provided to the victim without financial cost regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>According to interviews, offender victims of sexual abuse receive timely and unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of these services are determined according to their professional judgement. Victims of sexual abuse are offered timely information about access to emergency contraception and sexually transmitted infection prophylaxis. Security staff and non-security staff were able to describe all actions to be taken as a first responder for allegations of sexual abuse. The offenders who reported sexual abuse were seen by or offered to be seen by medical and/or mental health right away. No forensic examinations were required.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.83</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.83 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. AR 421 PREA Manual</li> <li>2. Medical directives</li> <li>3. Interviews with medical and mental health staff and four offenders who reported sexual abuse</li> <li>4. Medical and Mental Health Tracking Sheet</li> </ol> <p>Findings:</p> <p>115.83 Ongoing medical and mental health care for sexual abuse victims and abusers.</p> <p>A) The institution or facility offers medical and mental health evaluation and, as appropriate, treatment to all offenders who have been victimized by sexual abuse in any prison, jail or lockup facility.</p> <p>B) The evaluation and treatment of such victims shall 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.</p> <p>C) The institution or facility shall provide such victims with medical and mental health</p>

	<p>services consistent with the community level of care.</p> <p>D) E) These provisions do not apply as this is an all-male facility</p> <p>F) 421 PREA policy states that offender victims of sexual abuse, while incarcerated, shall be offered tests for sexually transmitted infections as medically appropriate.</p> <p>G) AR 421 PREA policy states that treatment services shall be provided to the victim without financial cost regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>H) 421 PREA policy states that facilities shall attempt to conduct a mental health evaluation of all known offender-on offender abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners.</p> <p>According to interviews, emergency services would be provided through the local hospital. Facility medical and mental health staff would follow up afterwards on the treatment plan and provide community referrals for continued care. Medical and mental health services are consistent with community level of care. This is a male-only facility. A psychosocial evaluation would be conducted for all known offender-on-offender abusers and treatment offered if appropriate.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.86 Sexual abuse incident reviews</b>	
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.86 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. AR 421 PREA Manual</li> <li>2. PREA-audit questionnaire (PAQ)</li> <li>3. Interviews with the Warden, PREA Compliance Manager (PCM), and incident review team members.</li> <li>4. Seven (7) Sexual Abuse Incident Reviews</li> </ol> <p>Findings:</p> <p>115.86 Sexual abuse incident reviews.</p> <p>A) The facility conducts a Sexual Abuse Incident Review (SAIR) at the conclusion of every substantiated sexual abuse investigation, including where the allegation has not been substantiated unless the allegation has been determined to be unfounded.</p> <p>The Department PREA Coordinator or designee will notify the facility PCM when a sexual abuse investigation has been officially closed.</p>

	<p>B) As Evidenced by a review of the incident reviews occurred within 30 days of the conclusion of every substantiated and unsubstantiated sexual abuse investigation, whether administrative or criminal.</p> <p>C) As evidenced by incident reviews the review panel includes upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners. The SAIR team shall utilize DOC 1925 and document their review for the following criteria:</p> <ol style="list-style-type: none"> <li>1. (1) Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse.</li> <li>(2) Consider whether the incident or allegation was motivated by race; ethnicity; gender identity. lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility.</li> <li>(3) Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse.</li> <li>(4) Assess the adequacy of staffing levels in that area during different shifts.</li> <li>(5) Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.</li> </ol> <p>D) 421 PREA policy states that a report of the committee’s findings shall include determinations made and any recommendations for improvement. The committee chair shall submit the report to the PCM and Warden unless they are part of the committee review. The Warden shall consider implementing recommendations for improvement or document the reasons for not doing so. The committee is comprised of the Associate Warden, PREA Compliance Manager, Shift Commander, Medical Practitioner, Mental Health Practitioner and OIG Investigator.</p> <p>According to interviews, all were able to describe the areas required to be considered during a review. The PCM will follow-up with concerns from the review.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.87 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. The Survey of Sexual Violence (for 2012 through 2023)</li> <li>2. AR 421 PREA Manual</li> </ol> <p>115.87 Data collection.</p>

	<p>Findings:</p> <p>115.87 Data collection.</p> <p>A) AR 421 PREA policy states that the Department collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and a set of definitions.</p> <p>B) AR 421 PREA policy states that the Department aggregates the incident-based sexual abuse data at least annually.</p> <p>C) AR 421 PREA policy states that the incident-based data collected includes, 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.</p> <p>D) 421 PREA policy states that the Department maintains, reviews, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.</p> <p>E) N/A Does not contract for the confinement of inmates.</p> <p>F) 421 PREA policy states that upon request, the Department shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.</p> <p>The facility meets compliance with this standard.</p>
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115.88	Data review for corrective action
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>115.88 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. The PREA annual reviews (from 2019 through 2023).</li> <li>2. AR 421 PREA Manual</li> <li>3. Interviews with the Director, PREA Coordinator (PC) and the PREA Compliance Manager (PCM)</li> <li>4. Agency website review</li> </ol> <p>Findings:</p> <p>115.88 Data review for corrective action.</p> <p>A) 421 PREA policy states that the Department reviews data collected and aggregated to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying</p>



	<p>problem areas; Taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective actions for each facility, as well as the Department as a whole.</p> <p>B) 421 PREA policy states that such reports shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the Department's progress in addressing sexual abuse. The agency's report shall be approved by the Director and made readily available to the public through its website.</p> <p>C) The annual PREA reports are posted on the department website.</p> <p>D) 421 PREA policy states that the Department may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility but must indicate the nature of the material redacted.</p> <p>According to interviews, the PCM collects sexual abuse and sexual harassment data using a spreadsheet. The PC retains data collected and prepares the annual report. All personally identifiable information (PII) is withheld from the report.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.89 Evidence analyzed:</p> <ol style="list-style-type: none"> <li>1. AR 421 PREA Manual</li> <li>2. The department website</li> <li>3. Site review observations – record storage</li> <li>4. Interview with PREA Coordinator (PC)</li> </ol> <p>Findings:</p> <p>115.89 Data storage, publication, and destruction.</p> <p>A) 421 PREA policy states the Department ensures that data collected pursuant to are securely retained.</p> <p>B) 421 PREA policy states that the Department shall make all aggregated sexual abuse data, from facilities under its direct control, and any facilities it contracts with, readily available to the public at least annually through its website. The department</p>

	<p>website contains all information as required by this standard. The website was reviewed to verify that sexual abuse data is publicly made available and does not include any personally identifiable information.</p> <p>C) 421 PREA policy states that before making aggregated sexual abuse data publicly available, the Department shall remove all personal identifiers</p> <p>D) 421 PREA policy states that the Department shall maintain sexual abuse data collected for at least 10 years after the date of the initial collection unless federal, State, or local law requires otherwise.</p> <p>The auditor was able to observe the physical storage and electronic storage of the risk assessments, medical records, and sexual abuse allegation reports. The physical storage was secured under lock and key. Electronic records are password protected with restricted and limited access.</p> <p>Informal conversations with staff verified that records are securely stored and access to electronic information is highly restricted on a need-to-know basis.</p> <p>According to interviews, incident-based and aggregated data are securely retained.</p> <p>The facility meets compliance with this standard.</p> <p>.</p>
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115.401	Frequency and scope of audits
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Documentation reviewed:</p> <ol style="list-style-type: none"> <li>1. Agency website review of PREA audit reports for all facilities</li> <li>2. Site review observations</li> <li>3. Pre-audit questionnaire (PAQ)</li> <li>4. Issue log</li> <li>5. Data collection worksheets</li> <li>6. Notice of Audit (NOA) postings</li> <li>7. Offender correspondence received (5 letters)</li> </ol> <p>Findings:</p> <p>(A) A review of the agency website verifies that during the three-year period starting on August 20, 2013, and during each three-year period thereafter, the</p>

	<p>agency ensured that each facility operated by the Agency is audited at least once.</p> <p>(B) This is the third year of cycle four. The agency ensures that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, is audited.</p> <p>(H) The auditor had full access to and observed all areas of the audited facility.</p> <p>(I) The auditor was permitted to request and receive copies of any relevant documents (including electronically stored information).</p> <p>(M) The auditor was permitted to conduct interviews with offenders in a private setting.</p> <p>(N) Offenders were permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel. NOA signage was provided to the facility in English and Spanish with instructions to post in all housing areas and other locations. Staff understood the process for mailing confidential mail to the auditor. The NOA contained language regarding the confidential nature of any correspondence sent to the auditor. All information included on the NOA was accurate. The auditor received written correspondence from five offenders (four prior to the onsite phase and one after). During the site review, NOA postings were consistently visible in each of the housing units.</p> <p>The facility meets compliance with this standard.</p>
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<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documentation reviewed:</p> <p>1. Agency website reviewed for final reports</p> <p>Findings:</p> <p>(F) The agency ensures that the auditor's final reports are published on the agency's website.</p> <p>The facility meets compliance with this standard.</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
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Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
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**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
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Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
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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
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**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
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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
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**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.)	na
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**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	na
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	that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	
<b>115.13 (a)</b>	<b>Supervision and monitoring</b>	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into	yes

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

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

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



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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes
<b>115.51 (c)</b>	<b>Inmate reporting</b>	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.51 (d)</b>	<b>Inmate reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
<b>115.52 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
<b>115.52 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	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
<b>115.52 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	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
<b>115.52 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	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
<b>115.52 (e)</b>	<b>Exhaustion of administrative remedies</b>	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	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
<b>115.52 (f)</b>	<b>Exhaustion of administrative remedies</b>	

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

(f)			
	<table><tr><td data-bbox="316 174 1289 568"><p>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.)</p></td><td data-bbox="1289 174 1490 568">yes</td></tr></table>	<p>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.)</p>	yes
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