

PREA Facility Audit Report: Final

Name of Facility: Stewart Conservation Camp

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 08/09/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: John N Katavich	Date of Signature: 08/09/2024

AUDITOR INFORMATION	
Auditor name:	Katavich, John
Email:	John.Katavich@cdcr.ca.gov
Start Date of On-Site Audit:	06/27/2024
End Date of On-Site Audit:	06/28/2024

FACILITY INFORMATION	
Facility name:	Stewart Conservation Camp
Facility physical address:	1721 Snyder Avenue, Carson City, Nevada - 89701
Facility mailing address:	PO Box 5005, Carson City, Nevada - 89702

Primary Contact

Name:	Ira Brannon
Email Address:	ibrannon@doc.nv.gov
Telephone Number:	(775)977-5210

Warden/Jail Administrator/Sheriff/Director	
Name:	John Henley
Email Address:	jhenley@doc.nv.gov
Telephone Number:	7759775013

Facility PREA Compliance Manager	
Name:	Ira Brannon
Email Address:	ibrannon@doc.nv.gov
Telephone Number:	O: 775-977-5210
Name:	John Alishio
Email Address:	jalishio@doc.nv.gov
Telephone Number:	O: 775-977-5109

Facility Characteristics	
Designed facility capacity:	360
Current population of facility:	300
Average daily population for the past 12 months:	294
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Males
Age range of population:	40

Facility security levels/inmate custody levels:	Minimum/Community Trustee
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	23
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	1802
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	526

AGENCY INFORMATION

Name of agency:	Nevada Department of Corrections
Governing authority or parent agency (if applicable):	
Physical Address:	3955 W. Russell Road, Las Vegas, Nevada - 89118
Mailing Address:	P.O. Box 7011, Carson City, Nevada - 89702
Telephone number:	725-216-6012

Agency Chief Executive Officer Information:

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

Agency-Wide PREA Coordinator Information

Name:	Deborah Striplin	Email Address:	dstriplin@doc.nv.gov
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Facility AUDIT FINDINGS

Summary of Audit Findings

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

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

Number of standards exceeded:

2

- 115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
- 115.41 - Screening for risk of victimization and abusiveness

Number of standards met:

43

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-06-27
2. End date of the onsite portion of the audit:	2024-06-28

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:	Sign of Hope Rape Crisis Center, Just Detention International

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	360
15. Average daily population for the past 12 months:	294
16. Number of inmate/resident/detainee housing units:	2
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	302
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	0
40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	5
43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	2

<p>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>1</p>
<p>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>1</p>
<p>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>7</p>
<p>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>No text provided.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>22</p>
<p>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>16</p>

<p>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>26</p>
<p>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</p>	<p>No text provided.</p>
<p>INTERVIEWS</p>	
<p>Inmate/Resident/Detainee Interviews</p>	
<p>Random Inmate/Resident/Detainee Interviews</p>	
<p>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>18</p>
<p>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p> <input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None </p>
<p>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>Used the housing unit roster and randomly highlighted names of inmates to interview. I made sure to get a sampling of inmates of different ages and races in the sampling.</p>
<p>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p> <input checked="" type="radio"/> Yes <input type="radio"/> No </p>

57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	10
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	2
61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	0

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Requested to interview inmates of this category and was informed there were none because the facility does not have the ability to provide services for these individual. We did not observe any during the tour or interviews.</p>
<p>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>1</p>
<p>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>1</p>
<p>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>2</p>
<p>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>2</p>

<p>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>1</p>
<p>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>2</p>
<p>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>2</p>
<p>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>SCC does not have a segregation unit. None of the investigations showed inmates being placed in segregation.</p>

70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.
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Staff, Volunteer, and Contractor Interviews

Random Staff Interviews

71. Enter the total number of RANDOM STAFF who were interviewed:	14
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72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	<input checked="" type="checkbox"/> Length of tenure in the facility <input checked="" type="checkbox"/> Shift assignment <input checked="" type="checkbox"/> Work assignment <input checked="" type="checkbox"/> Rank (or equivalent) <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None
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73. Were you able to conduct the minimum number of RANDOM STAFF interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	The audit team interviewed all of the staff that were at work on the two days of the audit, including all watches.
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Specialized Staff, Volunteers, and Contractor Interviews

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

75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	22
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76. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
78. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
79. Were you able to interview the PREA Compliance Manager?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

	<input checked="" type="checkbox"/> Other
If "Other," provide additional specialized staff roles interviewed:	Grievance coordinator, mail-room staff
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	2
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input checked="" type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input checked="" type="checkbox"/> Other
83. Provide any additional comments regarding selecting or interviewing specialized staff.	There are few volunteers that come to the facility. There were none at the facility at the time of the audit.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

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

<p>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>We tested the phone system. We went to all areas of the facility, including where inmates are not allowed to go. We observed the intake process and the follow-up screening process.</p>
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Documentation Sampling

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

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

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

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

3

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

<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>3</p>
<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>1</p>
<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

Staff-on-inmate sexual harassment investigation files

111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled: 2

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

Yes

No

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

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

Yes

No

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

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

There were a total of four PREA allegations received during the past two years. One Inmate-on-inmate case alleged both sexual abuse and sexual harassment, one inmate-on-inmate sexual abuse, one staff-on-inmate alleged both sexual abuse and sexual harassment and one staff-on-inmate sexual harassment. There are no sexual harassment cases that were criminal in nature.

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

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

Yes

No

<p>a. Enter the TOTAL NUMBER OF DOJ-CERTIFIED PREA AUDITORS who provided assistance at any point during this audit:</p>	<p>0</p>
<p>Non-certified Support Staff</p>	
<p>116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p> <input type="radio"/> Yes <input checked="" type="radio"/> No </p>
<p>AUDITING ARRANGEMENTS AND COMPENSATION</p>	
<p>121. Who paid you to conduct this audit?</p>	<p> <input type="radio"/> The audited facility or its parent agency <input checked="" type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option) <input type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm) <input type="radio"/> Other </p>
<p>Identify your state/territory or county government employer by name:</p>	<p>California Department of Corrections and Rehabilitation</p>
<p>Was this audit conducted as part of a consortium or circular auditing arrangement?</p>	<p> <input checked="" type="radio"/> Yes <input type="radio"/> No </p>

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>Nevada Department of Corrections (NDOC) Administrative Regulation (AR) 421, Custodial Sexual Misconduct, Inmate Sexual Offenses and Prison Rape Elimination Act, section 421.01, states “The Department has a Zero Tolerance policy for any form of sexual misconduct to include staff/contractor/or volunteer on inmate or inmate on inmate sexual harassment, sexual assault, sexual abusive contact and consensual sex.” Stewart Conservation Camp (SCC) has an additional policy (Operational Procedure 421) that reiterates AR 421. This policy outlines the institution’s approach to preventing, detecting, and responding to sexual abuse and sexual harassment. This OP also reiterates the NDOC zero tolerance policy.</p> <p>NDOC’s PREA Coordinator is Deborah Striplin. Ms. Striplin was assigned on October 18, 2019, as the PREA Coordinator for the Nevada Department of Corrections. During this PREA Audit, Ms. Striplin was readily available to assist the audit team and SCC through the audit process. Prior to being appointed as the PREA Coordinator, Ms.</p>

Striplin assisted the Inspector General for the State of Nevada in developing, implementing, and overseeing the NDOC's efforts to comply with the PREA standards. During the interactions with Ms. Striplin, it is apparent that she is committed to ensuring that the State of Nevada is compliant with the PREA standards. She is actively involved with all of the facilities in Nevada, overseeing their PREA compliance efforts. She reports directly to the State Inspector General.

SCC's PREA Compliance Manager (PCM) is Lieutenant Brannon. Lt Brannon has been assigned as the PREA compliance Manager at SCC since September 20, 2021. Lt. Brannon is the highest-ranking official at the camp and reports directly to the Warden (the warden oversees Northern Nevada Correctional Center and Stewart Conservation Camp). According to Lt. Brannon he does feel that he has sufficient time to coordinate the facility's efforts to comply with PREA. During the interview with the PCM, he explained how he keeps SCC current with the PREA standards, policies, and expectations. He has a positive working relationship with the PC and the Warden. The Warden and his administrative staff appear committed to insuring SCC's commitment to preventing, detecting, responding to, and reporting sexual abuse of inmates. The Warden was present and available to answer questions during the audit.

Because of the PCM's commitment to maintaining the safety of all inmates at SCC and his efforts to keep SCC free from sexual harassment and sexual abuse, coupled with the Warden and the PREA Coordinator's support, this facility was able to comply with all the PREA standards without need for a corrective action plan. All the issues that were discovered during the audit process were quickly fixed to the auditor's satisfaction. For this reason, I found that SCC exceeds standard 115.11.

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Nevada Department of Corrections (NDOC) has not had a contract with any other agency or business to house inmates on their behalf since 2020.</p> <p>Nevada Department of Corrections Administrative Regulation 421 PREA Manual, section 1.0 states that when the Department contracts for the confinement of offenders with private agencies or other entities, the Contract Administrator shall include in any new contract or contract renewal the entity's obligation to adopt and comply with the Department of Justice PREA standards. Any new contract shall</p>

	<p>provide for Department contract monitoring to ensure that the private agency or entity complies with the PREA standards. In the years that the contract facility is audited, the Contract Administrator will review the final report to ensure full compliance. In other years, monitoring may be done by conducting on-site inspections and reviewing documents.</p> <p>The NDOC Contract Administrator was interviewed on January 22, 2024. He said that when a new contract is created to house offenders for the Nevada Department of Corrections, he included the PREA Coordinator in the contract process so that any PREA related requirements will be included in the new contract. There currently are no contracts with any agencies or businesses to house inmates for the Nevada Department of Corrections.</p> <p>Further questions were asked to see if the NDOC uses contracted facilities to house inmates for substance abuse programs or “halfway houses” for paroled inmates and the auditor was told that NDOC does not use outside contractors for these types of programs. The NDOC PREA Coordinator stated that he would be involved if a contract were initiated with an external entity for this function. He would ensure that language in the contract is consistent with the requirements of PREA.</p>
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115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Administrative Regulation 326, Posting of Shifts, requires that at least once a year the PREA Coordinator shall assess, determine, and document whether adjustments are needed to the staffing plan and or video monitoring system. This auditor was provided a copy of the 2024 Staffing Plan and Review for Stewart Conservation Center. According to the Staffing Plan, Nevada Department of Corrections’ PREA Coordinator initiated a review and discussion of the staffing patterns for SCC with the Director of Corrections. The staffing plan considers:</p> <p>Generally accepted detention and correctional practices;</p> <p>Any Judicial findings of inadequacy (none);</p> <p>Any findings of inadequacies from a federal investigation agency (none);</p> <p>Any findings of inadequacies from an internal or external oversight body (none);</p> <p>All components of the facilities physical plant;</p>

The composition of the inmate population;

The number and placement of supervisory staff;

Institutional programs occurring on a particular shift;

Any applicable state or local laws or regulations (none);

The prevalence of substantiated or unsubstantiated incidents of sexual abuse.

SCC has a total of 13 custody positions including 1 Lieutenant (Camp Manager), 2 Senior Officers and 10 Correctional Officers authorized by the legislature. Currently SCC does not have any vacant positions. The minimum staffing requirement for SCC is always 2 officers present. Supervision is provided by the camp manager during weekdays (he is also on call 24 hours a day) and the Senior Correctional officers work day shift and swing shift. If additional assistance is needed there are resources available at Northern Nevada Correctional Center which is located on the same property. AR 326 defines two separate levels of staffing. Normal Operation is when all posts are filled. There are no modifications to program during this staffing level.

Emergency Operations is when there is just enough staff to fill the minimum number of posts to operate the facility. Whenever a modification to program is made, due to lack of staff, an incident report is created in Nevada Offender Tracking Information System (NOTIS). SCC has not fallen below the normal operation level since the last audit. All posts are always filled. Overtime is hired, if needed to fill staffing requirements.

The physical design of SCC consists of five dormitory style housing units, each with the capacity of 72 inmates. SCC is a minimum facility and does not have a security perimeter fence. The total capacity of the facility is 360 inmates.

There are several support buildings on the prison grounds. These are used for staff offices, dining, visiting, and other program services. Silver State Industries operates a ranch, dairy and the Wild Horse Training Program. SCC has five staff that supervise inmates and oversee these programs. SCC has community trustees work crews who provide support services for several state agencies in Carson City, Nevada. The Nevada Division of Forestry has a firefighting base at SCC. Inmates assigned to these crews are supervised by NDF staff when they are on assignment.

During the interview with the Warden, he explained how the staffing plan is established, adjusted and enforced. The staffing plan is approved by the Nevada Legislature as part of the budget process. The plan is based on best practices, and the American Correctional Association's and National Institute of Correction's staffing

models. Each year the plan is reviewed to see if adjustments need to be made based on mission changes, PREA and/or other serious incidents, program changes, legal challenges or legislative changes. According to the 2024 staffing plan, there are no findings of inadequacies by judicial ruling, Federal Investigative Agencies, or internal or external oversight bodies. There are no state, or local laws that dictate staffing requirements. The staffing plan contains an analysis of the inmate population by security level and security threat group.

During the tour of the facility staff were observed supervising inmates consistent with a minimum level facility. The housing units were toured by the custody staff on a regular basis. The officers that were interviewed said that they are required to tour each housing unit at least twice an hour at different intervals. According to the inmates that were interviewed, they see staff always moving around the facility, inspecting different areas.

Administrative Regulation 421, PREA, requires that supervisors make unannounced rounds to identify and deter staff sexual abuse and sexual harassment. The policy also prohibits staff from alerting other staff members that the supervisory rounds are occurring. This auditor was provided copies of the PREA- Unannounced Supervisor Tours from the Daily Shift Log. During swing shift and graveyard shift there are usually only two or three staff on grounds. During these hours the staff generally advise each other where they are going and what they are doing for security reasons. There are no concerns as to staff alerting each other about supervisor rounds since they are usually monitoring each other's movements and they are not posted in the housing units.

The Camp Commander stated that he does regular tours of the outside areas including the ranch, tag plant and composting area. There was no documentation available to show this occurring. All the staff and inmates stated that they see the Camp Commander in these areas. Prior to the interim/final audit report, the Camp Commander put logbooks in the outlying areas so that he could sign in during his tours.

During the tour, the audit team observed several locations that created victimization concerns. These were discussed with the PCM during the tour of the facility. All the non-compliance issues were corrected, and documentation of the correction was provided, prior to the completion of the interim/final report. The areas of concern were:

The laundry room had a lock on the inside of the door, making it not possible to enter from the outside if secured. It was determined that the lock was not necessary and

	<p>was removed.</p> <p>The property room had a blind spot. A mirror was added to illuminate this.</p> <p>The canteen staff restroom and the NDF shop staff restroom could not lock from the outside, making it un-securable. A lock was added.</p> <p>The NDF shop loft had a tarp across the front of it, creating a blind spot. The tarp was removed.</p> <p>The Tag Plant shipping area had blind spots between the shelves. A mirror was adjusted, and another was added to resolve the issue.</p> <p>The Tag Plant inmate restrooms had solid doors and locked from the inside. The doors were replaced with curtains.</p> <p>The ranch inmate restroom locked from the inside. The lock was removed.</p> <p>The warehouse freezers were all unlocked. Training was provided to staff to keep the freezers locked when not in use.</p>
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115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Nevada Department of Corrections (NDOC) requires that any juvenile inmate housed at an adult correctional facility shall be housed in a location out of sight, sound and physical contact of the adult inmates. The youthful inmates are not to be placed in isolation for this purpose.</p> <p>According to Operational Procedure 502, Youthful Offender Classification, Stewart Conservation Center does not house any inmates under the age of 18 years old. During the tour of the facility and the interviewing of inmates, there were no youthful inmates observed.</p>

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Operational Procedure 422, Searches and Seizure Procedures, page 4, section 422.03, 2, D, states that the staff shall not conduct cross-gender strip searches or cross-</p>

gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners. Section 422.03, 2, E, states SCC shall document all cross-gender strip searches and cross-gender visual body cavity searches. Administrative Regulation 492, Inmate Body Cavity Searches for Contraband, requires that any search of an inmate's body cavity is done in a manner consistent with the PREA standards.

According to the staff and inmates interviewed, female staff have not conducted any strip searches on male inmates at SCC. Strip searches are not routinely conducted at SCC. If, due to an unusual event, an inmate is required to be strip searched, the inmate is taken into the gym, away from all other inmates and uninvolved staff, and the procedure is conducted there. A memorandum authored by the PCM, dated January 1, 2024, states that there have not been any cross gender unclothed body searches conducted at SCC in the past year. SCC does not have any female custody staff assigned to the facility, nor do they house female inmates.

According to the inmates that were interviewed, none of them experienced being strip searched by a female staff member during the time that they have been housed at SCC.

SCC does not house female inmates. Standard 115.15(b) is not applicable.

OP 422, Search and Seizure Standards, section 422.03, section 2, A, states staff will allow 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 the routine performance of their job duties. The physical design of the bathrooms at the facility allows the inmates to use the toilet or take a shower without staff observing their buttocks or genitalia. Shower curtains are in place on all the shower stalls. The shower curtains are designed in a way that allows staff to see the head and feet of the inmates without exposing their private body areas.

During the tour of SCC, the audit team looked at all the inmate toilet areas, shower areas, housing units and strip search areas. Neither auditor observed any areas that created a cross gender viewing violation. When asked, all of the inmates stated that they are allowed to toilet, dress and shower without female staff watching them.

Operational Procedure 422, section 422.03, section 2, B, requires staff of the opposite

	<p>gender to be announced each time when entering a housing unit. SCC two female staff assigned to the facility (a nurse and a storekeeper), however there are females who will occasionally tour the facility, including administrators, delegates, and auditors. Two examples of the female announcement documentation were provided with the pre-audit materials. A review of NOTIS confirmed this documentation.</p> <p>During the inmate interviews, every inmate stated that female staff's presence is announced every time that they enter the housing unit. During the tour the announcements were always made in our presence. All staff stated that the announcements are routine and expected.</p> <p>OP 422, Search and Seizure Standards, section 422.03, 2, C, restricts staff from searching inmates for the sole purpose of determining their genital statues.</p> <p>Information on an offender's genital statues is to be obtained during routine conversation or a review of medical records. All of the staff interviewed stated that they do not search inmates to determine their genitalia statues and knew it was against policy to do so. None of the inmates claimed to have been strip searched for this reason.</p> <p>The training that is provided to custody staff by NDOC is very thorough and comprehensive on searching methods. The training power point demonstrates, to staff, how to properly conduct a pat down search of transgender and intersex inmates. All staff are required to demonstrate proper search technics to the instructor prior to passing the class. The training is provided annually during the Defensive Tactics Class. A list of custody staff, with their training dates for 2023 and 2024 was provided to the audit team. This list showed 100% compliance for 2023. The 2024 list showed 4 of 11 of the staff completed the training with over six months left to complete the training.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Administrative Regulation 421, Prison Rape Elimination Act, section 421.07, states that all inmates will be afforded PREA education, including inmates who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. The PREA resource Manual requires that the facility utilize the necessary resources that are available to assist inmates who have disabilities to ensure those inmates have equal access to participate in or benefit from every aspect of the prevention, detection and response to sexual abuse and</p>

sexual harassment. SCC OP 511, Inmate Orientation, section 511.01, states SCC will ensure that written orientation material, with translations in the offender's first language, are provide where practical. If orientation materials are not available in the offender's first language, the Learning Bank (telephone translation service) shall be contacted. Information regarding the Prison Rape Elimination Act is included in the list of orientation materials.

Five new arriving inmates were received on the first day of the on-site portion of the audit. This auditor observed the intake process. All inmates were required to watch a 15-minute video on NDOC's PREA policy. During the PREA screening, the caseworker offers a copy of the Prison Rape Elimination Act Education and Information Sheet to the inmate. The information sheet provides detailed information about the NDOC PREA policy, how to contact the Office of Inspector General, contact the rape crisis center, write the New Mexico PREA unit and all other necessary PREA information. The video and handout are available in both English, and Spanish. The videos do have closed caption for the hearing impaired. Inmates are required to sign acknowledgement of receiving the information. Inmates Received at SCC who are unable to read and/or sign the 2096-2, Intake PREA Acknowledgement Form, are provided appropriate accommodations and a note is made on the SCC Intake PREA Acknowledgement Form and within the corresponding case note.

AR 658, Reasonable Accommodations, section 658.07, states that the ADA Coordinator, with the assistance on the Medical Department, will ensure that hearing and vision impaired inmates have access to auxiliary aids when required for effective communication in assessing and participating in programs and services, including PREA reporting and follow-up. The staff at SCC explained how they make sure that all inmates understand the material that is provided upon intake at SCC. Prior to receiving the inmates at SCC, there file is reviewed. If the inmate has any physical or mental limitations, the staff at SCC will take steps to ensure that the information is available in a format that is accommodating to the inmate.

NDOC has contracted with CTS Language Link to provide both spoken interpretation and written translation services. Information on how to access those services can be found in the housing unit office and the Caseworker's Office. The audit team was provided copies of the contract with CTS Language Link. This language link was used by one of the auditors to conduct an interview with an inmate who did not speak English. Each staff member interviewed knew about this service and where to find the contact information when asked.

The Nevada Department of Corrections also has a contract for American Sign Language interruptive services with American Sign Language Communications LLC. A

	<p>copy of the contract was provided with the pre-audit materials.</p> <p>The audit team observed several methods for inmates at SCC with physical disabilities, such as vision and hearing impaired to receive the information. Operational Procedure 511, Inmate Orientation, requires that written information be provided to the inmate in their first language if practical. Because SCC is a working camp, with limited medical resources, inmates with serious medical or mental health concerns are not housed at this facility.</p> <p>The caseworker explained how he uses the language link to interview non-English speaking inmates. All the staff interviewed knew it was against policy to use an inmate interpreter for PREA screening or investigating. At the time of the on-site portion of the audit, SCC had three inmates who claimed that English was not their primary language. Only one of these inmates was not proficient at speaking English. The language link was used to interview this inmate. During the interview he stated that staff communicate with him through the language link when they conduct any interviews with him.</p>
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115.17	Hiring and promotion decisions
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Nevada Department of Corrections Prison Rape Elimination Act Manual, page 4, mandates that the Department shall not hire or promote an individual to a position that may have contact with offenders who meets any of the three criteria listed in section 115.17 (a). NDOC requires that every applicant/volunteer/contractor who may have contact with an inmate disclose the following information prior to entering into any NDOC facility:</p> <p>Have they engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other place of detention?</p> <p>Have they 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?</p> <p>Have they been civilly or administratively adjudicated to have engaged in the activity described above?</p> <p>Have they been engaged in any type of inmate sexual harassment, of any person in the community or confinement setting?</p>

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

NDOC Administrative Regulation 300 requires that NDOC complete a background check before hiring or promoting any staff member. NDOC uses National Crime Information Center (NCIC) and the Nevada Department of Public Safety, Records, communications and Compliance Division to complete background clearances. 21 personnel files were reviewed. All 21 of the personnel files showed that a background check had been completed upon initial hiring or during the last promotion.

Human Resources must make its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. None of the random files that the audit team reviewed required this pre-employment background check. Of the 21 personnel files reviewed, all 21 employees' files contained the employee self-certification that they had not engaged in sexual misconduct with an inmate. During the interview with the head of personnel, he explained the hiring process and how background checks are conducted. He explained what his staff would do if they discovered that an employee was dishonest during the application and hiring process.

The office of the Inspector General is required to do a biannual audit of random HR files for employees of the Department who were hired in the previous six months to ensure compliance with the required background check. According to Administrative Regulation 4521.04, NDOC conducts background checks on all current employees every three years. The month that the employee was hired determines which month the follow-up background check will be conducted. The last cycle was initiated in August 2020. Of the 21 files reviewed, 13 had been hired or promoted over five years ago. All 13 of these employees had a background check completed by the Office of the Inspector General within the past five years.

NDOC policy requires Human Resources to disclose any substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a

request from an institutional employer for whom the employee has applied for work. SCC provided one example of a request about a prospective employee that they received from another agency with the pre-audit materials. This request was over three years old. This request was responded to timely. The head of personnel stated that he would provide any information on prior sexual abuse or sexual harassment of an inmate if he received an inquiry from another institution about a previous employee.

NDOC Operational Procedure SS-0063, Background Clearance Application Procedure, requires that every contractor must have a background check completed prior to entering the facility. Additionally, AR 212 requires that the background check be completed annually. According to this policy, a contractor is always denied if they have any type of sexual conviction.

SCC was able to provide the documents that all contractors and volunteers must fill out and sign prior to being allowed to have contact with inmates. Additionally, they are required to disclose any prior sexual misconduct convictions, administrative or civil actions, annually during their PREA training. Policy requires the volunteer or contractor to disclose any sexual misconduct. Failure to do so would result in restriction from grounds. A list of all of the volunteers and contract staff approved to enter NDOC facilities was provided to this auditor. The three contractor files were reviewed by the audit team. The documents viewed by this audit team showed that all of the approved individuals have had their background cleared within the past three years and had signed a document disclosing any prior sexual misconduct in an institutional setting.

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The NDOC PREA Manual requires that when the Department is designing or acquiring any new facility or planning any major expansion, acquisition, or modification, that the Director, Deputy Director(s) and designee consider the effect of the design, acquisition, expansion or modification on the Department’s ability to protect inmates from sexual abuse. Additionally, the manual requires the Department when installing new electronic monitoring systems, to consider how the technology will enhance the Department’s ability to protect inmates from sexual abuse.</p> <p>According to the PCM, SCC has not had any upgrades to the facility since the last PREA audit that was conducted in 2019. There is a request for cameras to help</p>

	provide additional security, however funding has not been acquired yet.
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115.21	Evidence protocol and forensic medical examinations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Administrative Regulation 421, section 421.12, states that NDOC office of the Inspector General, will investigate all allegations of staff-on-inmate sexual abuse and sexual harassment and all inmate-on-inmate sexual abuse. The PREA Manual, page 35, address the protocols for collection of evidence for use in an administrative proceedings and criminal prosecution. AR 457, Investigations, provides staff direction on discovery, handling, delivery, retrieval, logging, storage, retention and destruction of all evidence.</p> <p>NDOC policies mirror the National Protocol for Sexual Assault Medical Forensic Examinations as set forth by the Office of Violence Against Women. SCC policy requires the use a coordinated team approach to respond to reports of sexual assault. It requires that the victim have access to a victim advocate, and immediate medical care. All allegations are investigated. NDOC Medical Directive 117, Sexual Assault, requires the utilization a qualified SAFE/SANE nurse from the community to conduct medical exams and the process is handled, keeping the victim's confidentiality in mind. The policy states that the inmate will be provided medical and emotional support at no cost to the inmate.</p> <p>SCC utilizes the Washoe County Child Advocacy Center to conduct forensic exams. According to the administrator at WCCAC, they have four SAFE/SANE trained nurses that conduct sexual assault exams. The SAFE/SANE nurses' training follows the National Protocol for Sexual Assault Medical Forensic Examinations as set forth by the Office of Violence Against Women. There is always a SAFE/SANE nurse on call and available to conduct the exam according to the administrator. There is no MOU or contract in place with the NDOC, however by statute, WCCAC must accept all patients without prejudice. If an inmate claims to have been sexually assaulted, and agrees to a SAFE/SANE exam, the exam is conducted at the local hospital emergency room during business hours and at the agency office during non-business hours.</p> <p>The Shift Supervisor Sexual Assault /Abuse Checklist provides staff with guidance on transporting an inmate that is in need of a forensic exam. The procedure explains the evidence collection process, prior to the exam, the time frames for conducting the exam and guidance on transporting the inmate victim and suspect to the SAFE/SANE</p>

	<p>nurse for the forensic exam. There have not been any allegations that have required a forensic exam during this audit period. A review of the incident reports demonstrates compliance with this standard.</p> <p>SCC uses Sexual Assault Support Services of Reno for victim advocacy services also. According to the coordinator, they will accompany the offender, if requested, during the exam and investigation process. NDOC also has a contract in place with The Rape Crisis Center (RCC) in Las Vegas in the event of a sexual assault. RCC has either staff or volunteers answering the rape hotline 24 hours a day, seven days a week. All of the volunteers are required to take a 50-hour training course on crisis intervention.</p> <p>During the interviews with the investigators and the PCM they stated that inmates are offered a victim advocate in the event that they are going to have a forensic exam. The investigators also stated that they would let the victim advocate accompany the victim inmate during the investigation interview if the inmate requests it. They had not had any inmates request a victim advocate during the interview in the past.</p>
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115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Administrative Regulation 421, Custodial Sexual Misconduct, Inmate Sexual Offenses and Prison Rape Elimination Act, section 421.12, states “NDOC Office of the Inspector General will investigate all allegations of staff on inmate sexual abuse, sexual harassment and inmate on inmate sexual abuse.” Additionally, the AR states that all substantiated criminal cases shall be referred to the applicable prosecutorial authority for review of prosecution. This information is on the NDOC website. AR 457, Investigations, states that all incidents shall be reported to the IG per the requirements of AR 332. The IG or designee shall be immediately notified of PREA related or serious incidents involving suspected criminal activity by inmates, staff, or outside parties, or serious violations of Department policy.</p> <p>AR 421 requires that SCC shall ensure that all allegations of sexual abuse and sexual harassment are referred to the NDOC Inspector General’s (IG) Office for investigation. According to AR 457, AR 421 and the NDOC PREA Manual, the IG’s Office will conduct all PREA investigations involving staff and all potential criminal PREA investigations. If the investigation is determined by the IG’s Office to be non-criminal and does not involve staff, they may direct the facility to conduct an administrative investigation</p>

	<p>locally.</p> <p>This auditor spoke with the PREA Coordinator for the NDOC. She confirmed that it is the IG Office’s responsibility to investigate PREA allegations in NDOC. The IG’s office is notified via the Nevada Offender Tracking Information System (NOTIS), the electronic incident notice system used by NDOC. In emergency cases they are notified via telephone. Once the IG’s office receives the notice, they will assign an investigator to the case. At the conclusion of the investigation, if it appears that a felony has taken place, the IG will refer the case to the Attorney General. The Nevada Department of Corrections Prison Rape Elimination Act Manual provides further direction on the Office of Inspector General’s responsibility while conducting a criminal investigation.</p> <p>This auditor interviewed the one of the Investigators for the Inspector General’s Office regarding the investigation of PREA allegations. The investigator stated that they (the IG’s Office) investigate all PREA cases that may result in prosecution. If the incident does not appear to be a criminal act, or involve a staff member, the case may be assigned to a supervisor at the institution for fact finding and investigation. One of the institutional investigators was also interviewed. He stated that, if an investigation is not criminal or involve staff, the investigation may be delegated to him through the Warden’s Office.</p> <p>During the audit the PREA incident log was reviewed. There were 5 cases reported during the past 24 months. All 5 were reported to the Inspector General. Only substantiated, sexual abuse cases are referred to the Attorney General for prosecution. SCC did not have any PREA cases that met the criteria for referring a case for prosecution during this audit period.</p>
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115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Administrative Regulation 360, Correctional Employee/Officer Basic Training Program, requires that all staff attend the 80-hour new employee training upon employment. Included in this training is PREA training. The training syllabus was provided with the pre-audit materials. The training includes the following:</p> <p>Zero Tolerance Policy</p> <p>How to report, detect, prevent and respond to such allegations</p>

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

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

The dynamics of sexual abuse and harassment in confinement

The common reactions of sexual abuse and harassment victims

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

How to avoid inappropriate relationships with inmates

How to communicate effectively and professionally with the LGBTI

How to comply with relevant laws related to mandatory reporting

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

In 2017, all current employees were to receive training in cross gender/transgender pat down searches. Any employee that is hired after 2017 receives the training in the PST. Pat search training is also taught annually in the Defensive Tactics Training. All custody staff have completed the pat search training. The class sign-in sheets were provided to this auditor.

PREA training for 2023 was computer-based training. This is a full PREA training course, including any relevant updates or changes to PREA policies. Participants must pass a quiz to receive credit for the course. A certificate of completion is printed at the completion of this course. Certificates of achievement was provided for every employee to this auditor as proof of practice. PREA training for 2024 was conducted in person. At the conclusion of the class, an employee must sign that they understand the agencies zero tolerance policy and their responsibility to prevent, detect, report and respond to sexual abuse and sexual harassment of an inmate. The signed acknowledgment forms were provided to this auditor for all the employees at SCC, except one. This employee has not received the class yet with over six months still left in the year to take the class.

All of the staff interviewed were able to explain their role in the PREA process. Every staff knew the zero-tolerance policy. They knew that they were mandated to report any PREA allegation to their supervisor and to maintain confidentiality. The staff stated that they would make sure the alleged victim was safe and preserve any crime

	<p>scene. The general view of the staff that were interviewed was that they would take any allegation serious and would respond accordingly. The staff did not present an air of indifference to the audit team.</p>
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115.32	Volunteer and contractor training
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Administrative Regulation 802, Community Volunteer Program, requires that all volunteers shall attend PREA training. The training covers the NDOC zero tolerance policy, and the volunteer/contractor’s responsibility under the NDOC’s sexual abuse and sexual harassment prevention, detection and response policies and procedures. An acknowledgment of receipt of training is then signed by the volunteer staff. This training is required prior to having contact with inmates and then every three years after that.</p> <p>Administrative Regulation 212, Contracts, section 212.03, requires that all contractors that have contact with inmates shall be notified of the agencies zero tolerance policy regarding sexual abuse and sexual harassment and be informed on how to report it.</p> <p>The training PowerPoint for the volunteer and contractors was provided with the pre-audit information. The information on NDOC’s zero tolerance policy is included in this training. It explains how to report a PREA allegation and informs the volunteers/contractors that they are mandatory reporters.</p> <p>There are several contract staff that work at SCC on a full-time basis. SCC has a license plate factory, a compost manufacturing plant, a forestry crew, and a wild horse training ranch. All of these utilize contractors who work for private industry or other state agencies. The required training includes PREA training. Five random contractor’s training files were reviewed. All of them contained the required training acknowledgment forms and were signed within the past year.</p> <p>SCC has 16 volunteers on their Gatehouse list that come into the facility. All the volunteers that visit this facility were trained within the past year. Three random files of volunteers were reviewed. All of them contained the document acknowledging that they have received and understood the PREA training. All of the documents were signed by the volunteer within the past 12 months. 48 signed acknowledgment forms were provided with the pre-audit information. Seven of these were volunteers who</p>

	<p>entered SCC in the past year.</p> <p>During the interviews with the volunteers and contractors, they were able to explain the NDOC zero tolerance policy. They all knew their responsibility to report sexual abuse/sexual harassment and they were able to adequately describe what they would do if an inmate disclosed to them that they had been sexually abused or harassed.</p>
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115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Administrative Regulation 511, Inmate Orientation Program, requires that inmates receive information on PREA upon arrival. The inmates are provided an orientation handbook and a PREA Information and Education Sheet. This document explains the NDOC zero tolerance policy, the inmate’s rights under PREA and how to report a PREA incident. The Information and Education Sheet are available in both English and Spanish. AR 511 requires that when a literacy problem exists, staff will assist an inmate in understanding the material. AR 421 states that inmates are shown the Impact Justice/Just Detention PREA video within 30 minutes of upon arrival. The inmates then sign a document acknowledging that they watched the video and understand the information. The information that the inmate received the training is input into NOTIS.</p> <p>The PREA information sheet contains the NDOC zero tolerance policy on sexual abuse and sexual harassment, that inmates have a right to be free from sexual abuse/harassment and how to report sexual abuse/harassment. The information sheet provides the phone numbers and addresses to the State of Nevada’s Inspector General’s Office, the Rape Crisis Center in Las Vegas and the New Mexico Department of Correction PREA Unit so that inmates can report to an outside government agency. NDOC has a contract in place with CTS Language Link and TransPerfect Translations International to provide interpretive services for offenders who do not understand English.</p> <p>SCC has the policy available in written format in both Spanish and English. The video is available in both Spanish and English and includes closed caption for the hearing impaired. NDOC has a picture book available to the inmates who cannot read or have learning disabilities. This book is titled “Don’t Touch Me” and explains how inmates use power and intimidation to take sexual advantage of other inmates. The book then explains how to report issues and avoid these situations. According to the</p>

intakes staff who provide the inmates the education, if the inmate is unable to comprehend the information, it is explained to them in detail. Because SCC is a working fire camp, inmates with medical and mental health limitations are not housed at the facility.

The audit team observed the intake process during the on-site portion of the audit. When the inmates first arrive, they are shown a 15-minute video. This video explains the NDOC zero tolerance policy and how to report a PREA allegation. The caseworker then interviews the inmate and discusses the PREA information that was provided with the inmate to make sure that the inmate understands the information that they are received. The inmates are also provided the inmate PREA information and Education Sheet. The caseworker then asks the PREA screening questions addressed in standard 115.41. The inmate then signs the acknowledgment sheet at that time.

The intake staff explained to the audit team what they do if an inmate does not comprehend English. They provide the Spanish version of the video for them to watch and give them copies of PREA Information and Education Sheet in Spanish. If the inmate does not speak either English or Spanish, they would use the Language Link. According to the caseworkers, they have used the Language Link in the past.

The Spanish speaking inmate that was interviewed confirmed that he was interviewed with use of an interpreter over the telephone.

Documentation provided to this auditor, along with random reviews of 20 inmate files, and inmate interviews indicated that the inmate education portion of PREA is well within the standard. A review of inmate files revealed that copies of the signed acknowledgement form were in all 20 files reviewed. All of the inmates were provided the comprehensive PREA education on the day of arrival.

All 30 inmates interviewed SCC for less than three years. All these inmates stated that they remember receiving the PREA information upon arrival. All 30 inmates were familiar with the PREA policy and knew that sexual assault and harassment were a violation of the rules. Every one of the inmates that were interviewed knew at least three ways that they could report a PREA.

All of the common areas had posters, in English and Spanish, explaining the NDOC PREA zero tolerance policy and how to report sexual abuse/sexual harassment visible to the inmate population.

115.34	Specialized training: Investigations
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	Auditor Overall Determination: Meets Standard
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	<p>Auditor Discussion</p> <p>NDOC utilizes investigators from the Inspector General’s Office to conduct all PREA allegation investigations. The investigators are required to attend the same PREA training as all NDOC employees. Additionally, they are required to take the National Institute of Corrections course on Investigating Sexual Abuse in a Confined Setting and Investigating Sexual Abuse in a Confined Setting: Advanced Investigations. These course covers techniques for interviewing sexual abuse victims, compelled interview warnings, sexual abuse evidence collection and criteria and evidence required to substantiate a case for administrative or criminal prosecution.</p> <p>This auditor was provided a copy of the training syllabus and completion certificates of the investigators for the Inspector General’s Office. The IG’s Office has eighteen PREA trained investigators. The audit team was provided copies of all eighteen investigator’s training certificates. SCC has one supervisor that is used as a local investigator to investigate non-criminal, non-staff PREA cases. His training certificate, demonstrating completion of the NIC courses, were provided to the auditor.</p> <p>The audit team interviewed one investigator from SCC and one Investigator from the IG’s Office. During the interview with the investigators, they demonstrated knowledge on how to conduct a PREA investigation. This knowledge included what evidence to look for during an investigation, how to interview the alleged victim, suspect and potential witnesses. The investigators were able to explain how and when they would refer a case for prosecution. Both of the investigators interviewed knew how to conduct compelled interviews.</p>
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115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>NDOC policy on medical training requires that all full and part time medical and mental health care practitioners who work regularly in the facility receive specialized PREA training.</p> <p>The NDOC PREA Manual states that all medical and mental health employees assigned in the Department will complete specialized training specifically in:</p> <ul style="list-style-type: none"> How to detect and assess signs of sexual abuse and sexual harassment How to preserve physical evidence of sexual harassment How to respond effectively and professionally to victims of sexual abuse and sexual

harassment

How and to whom to report allegations or suspicions of sexual abuse and sexual harassment

This training is provided by the National Institute of Corrections on-line training facility. A printed certificate documenting the completion of the class is to be placed in the employee's supervisory file at the institution and within the Department's employee training file. The two on-line classes that medical/mental health staff are required to take to fulfill this standard are "Medical Health Care for Sexual Assault Victims in a Confined Setting" and "Behavioral Health Care for Sexual Assault Victims in a Confined Setting". SCC OP 609, Medical Standards for PREA Allegations, also requires all medical staff receive training in evidence collection. This training is provided by trained custody staff and documented with a training certificate in the employees supervisor file.

All medical and mental health care practitioners are also required to receive the training mandated for employees in PREA standards 115.31 and 115.32, depending on their employment status. Administrative Regulation 360, Correctional Employee/Officer Basic Training Program, requires that all staff attend the 80-hour new employee training upon employment. Included in this training is PREA training. Medical Staff are not excluded from this requirement.

NDOC Medical staff are not trained to conduct forensic exams. All forensic exams are conducted by a SAFE/SANE Nurse from Washoe County Children's Advocacy Center.

SCC has one nurse that works at the facility. She provides routine medical care to the camp inmate population. Any extensive medical care is provided at Northern Nevada Correctional Center (NNCC) or at the local Hospital. The nurse has received the training as required per standard 115.35. A copy of the Certificate of Completion was provided with the pre-audit materials.

SCC has one Mental Health clinician that comes to the facility on an as needed basis. If an inmate requests mental health services, they are taken to NNCC for the appointment with the Mental Health Staff at NNCC, or the Clinician comes to see the inmate at SCC. The Mental Health Clinician was not on site either day that the audit team was at SCC. His Specialized Medical PREA Training certificate was provided with the pre-audit material.

During the interview with the nurse, she explained the specialized training that she received relative to PREA. She knew her role and responsibility when an inmate

	<p>makes a PREA allegation. She appeared to know of how to communicate with a victim of a sexual assault and her obligation to report a sexual assault that occurred in a correctional setting. She stated that she was not trained to conduct forensic exams and stated that these types of exams are conducted by specially trained nurses in the community.</p>
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115.41	Screening for risk of victimization and abusiveness
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	<p>Auditor Overall Determination: Exceeds Standard</p>
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	<p>Auditor Discussion</p>
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	<p>Administrative Regulation 573, PREA Screening and Classification, section 573.01, states that a transfer screening should take place as soon as possible, but shall be completed within 72 hours of arrival at a new facility. Whenever possible, and consistent with the safety and security needs, inmates are not to be housed together in two-man cells prior to PREA screening. A case note (PREA-Intake Assessment) will be generated to document said action.</p>
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	<p>The PREA Risk Assessment Tool (DOC 2097) utilized by NDOC has 10 questions to assess the inmate’s vulnerability toward victimization and 4 questions to assess his potential toward predatory behavior.</p>
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	<p>The PREA Risk Assessment will be used for all screenings and assessments include the following factors:</p>
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	<p>Possible Victim Factors:</p>
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	<p>Whether the inmate has a mental, physical or developmental disability.</p>
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	<p>The age of the inmate.</p>
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	<p>The physical build of the inmate.</p>
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	<p>Whether the inmate has previously been incarcerated.</p>
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	<p>Whether the inmate has previously been incarcerated.</p>
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Whether the inmate's criminal history is exclusively nonviolent.

Whether the inmate has prior convictions for sex offenses.

Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming.

Whether the inmate has previously experienced sexual victimization.

The inmate's own perception of vulnerability.

A transgender and/or intersex inmate's own views with respect to his/her safety shall be given serious consideration.

Possible Aggressor Factors:

History of institutional violent behavior.

Any history of sexual abuse.

History of convictions for violent offenses.

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

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

The audit team observed the intake process during the on-site tour. When an Inmate arrives at SCC, the Correctional Casework Specialist (CCS) interviews the inmate in a confidential, secure office in the Program Office area. The CCS completes the objective screening assessment, with the input of the inmate. A case note is entered in NOTIS to document that the assessment tool was completed and note if any alerts were added. All data will be entered into the Microsoft Access PREA tracking database. Once the assessment tool is completed, it will be placed in the I-file. A CCS is available to interview and assess inmates on the day of transfer from another facility. If SCC receives an inmate from another NDOC facility after normal business hours, the inmate is screened the next business day. All new arrival inmates are housed in a housing unit consistent with their safety and security needs.

SCC provided a copy of their assessment tracking with the Pre-Audit materials. The tracking includes the inmate's name and number, the date of arrival, if MH was offered, accepted, and referred, date of MH assessment, and, if the inmate is transgender, the date of the six-month follow-up. It also includes when the follow-up assessment was completed. Reviewing the information on the tracking provides the facility a quick assessment on their PREA compliance with standard 115.41. Of the over 700 inmates that arrived at the facility in the past year, the tracking indicates that all of them received their initial screening and their follow-up screening within the proper time frames.

Administrative Regulation 573, PREA Screening and Classification, section 573.01, requires that the initial screening should take place as soon as possible, but shall be completed within 72 hours of arrival at an institution or facility, excluding holidays.

The inmate will be personally interviewed by a Caseworker and a PREA Intake Assessment will be completed in NOTIS. A case note (PREA Intake/Transfer Assessment) will be generated to document that an assessment was completed.

Following completion of the Intake Assessment, the Caseworker will confirm that all applicable Alerts have auto-populated and are present in NOTIS (e.g. PREA-High Risk of Sexual Victimization; PREA-High Risk of Sexual Abusiveness; Security-Safety Needs). If an Alert is not present/did not auto-populate the appropriate alert will be added and documented in the PREA Intake/Transfer Assessment case note.

Administrative Regulation 573, PREA Screening and Classification, section 573.01, requires that within 30 days from the inmate's arrival at the facility, the unit Caseworker will reassess the inmate's risk of victimization or potential for abusiveness towards other inmates based upon any additional, relevant information which may have been received since the initial screening. If there are no additional concerns, a case note (PREA 30 Day Follow Up) is generated to reflect that there have been no changes to the PREA Intake Assessment. If, upon interview, additional information is received, a PREA Risk Assessment is completed. A corresponding Alert in NOTIS is entered on all known victims (PREA High Risk of Sexual Victimization) and

all known predators (PREA High Risk of Sexual Abusiveness).

According to the caseworker, he does a follow-up screening on all inmates with-in 21 days. He stated that he calls the inmate to his office and asks them if anything has changed in the answers to the original questions or if there is any new PREA information that the inmate may want to provide.

A review of the provided tracking list revealed that the last year of that inmates were screened for risk assessment on the day of arrival and then again within 30 days only 100% of the time.

All inmates have a classification/program review ever six months. Transgender/ intersex inmates receive a PREA assessment during this review. Inmates will also be reassessed if; the inmate requests it, a staff member refers an inmate for reassessment, if additional information is received or if the inmate is involved in an incident of sexual abuse. According to the Operational Procedure, Inmates cannot be disciplined for refusing to answer these questions. The PCM and the caseworker, both stated that the inmates are not disciplined if they refuse to answer the screening questions.

The audit team reviewed twenty random inmate files. All twenty files included an initial screening completed on the day of arrival. All twenty files showed the follow-up screening completed within 30 days.

During interviews with a sample of the inmate population, all the 30 inmates interviewed, remember going through the PREA screening process on the day of arrival. Of those same 30 inmates, all of them remember being asked questions regarding their sexual safety a second time within one month of arrival by the caseworker. Most of the inmates said this occurred about two weeks after arrival at SCC.

Only staff have access to the files. The results of the risk assessment are not shared with any other inmates.

Casework staff do an excellent job ensuring that all the inmates are screened on time and that the information is updated as information changes. Data demonstrates that all 700 inmates received in the past year had timely initial and follow-up screenings. Random file reviews and inmate interviews supported this data. Based on this

	observation, SCC was rated as exceeding standard 115.41.
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115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Administrative Regulation 573, Prison Rape Elimination Act Screening and Classification, section 573.03, states that staff shall use information from the risk assessment to make informed housing, bed, work, education and program assignments with the goal of keeping separate those 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. Prior to initiating a bed move, the caseworker must check PREA Alerts for victimization and/or abusiveness. At no time will a known victim and a known aggressor be housed together in a two-man cell. A possible victim and a possible aggressor should not be housed together unless necessary. Non-victims and non-aggressors may be housed with any other category, subject to individual case factors.</p> <p>Because Steward Conservation Camp is a minimum custody facility, possible aggressors are not normally housed at the facility. During the interviews with the classification staff, they explained what they review prior to housing an inmate or placing him in a work assignment. They stated that there are enough housing options available so that they do not house a possible victim and a possible aggressor in the same dorm if a possible aggressor was assigned to the facility. Additional attention would be given to the work assignment of a possible aggressor to make sure that they are not working with a possible victim.</p> <p>AR 494, evaluation, Placement, and Treatment of Transgender and/or Intersex Inmates, requires the Non-Conforming Gender Review Committee (NGRC) to determine where to house transgender inmates. The committee requires the input from medical doctors and Mental Health Clinicians. A complete medical and mental health history is required and any relevant information from the inmate is considered. The NGRC convenes every quarter. As of this date, they have reviewed several requests by trans-female inmates to house at a female facility. Notes from the NGRC were provided with the pre-audit materials. The committee was attended by the NDOC Medical Director, Mental Health Director, the PREA Coordinator, and Deputy Director. The committee was chaired by the NDOC Director. All the cases were denied placement in a female facility, citing predatory and other safety concerns.</p>

All NDOC inmates' safety and program needs are reassessed every twelve months. AR 573, PREA Screening and Classification, section 573.01, states that Placement and programming assignments for each transgender or intersex inmate will be reassessed at least twice each year to review any threats to safety experienced by the inmate. These reassessments should be completed in conjunction with the inmate's regularly scheduled periodic/six-month review. Inmates will be personally interviewed by a Caseworker, a PREA Special Assessment will be completed in NOTIS, and a PREA Special Referral case note will be generated documenting that the assessment was completed. Policy requires that the view of the transgender or intersex inmate toward their safety will be given serious consideration. The only transgender inmate at the facility has only been at the facility for three months. The PCM knew when his six-month review was due.

AR 573, section 573.02, requires that transgender and intersex inmates are given the opportunity to shower separately from the other inmates. The design of the showers at SCC allows all inmates to shower separately from each other. There is one inmate at SCC who has identified as transgender. This inmate claimed that she has not requested special shower considerations because the design of the showers allows her to shower without others watching. The PCM said that if a transgender inmate requested to shower separately, arrangements would be made so that it would happen.

NDOC does not house transgender, intersex, lesbian, gay or bisexual inmates in specific facilities. SCC does not house transgender, intersex, homosexual or bi-sexual inmates in specific housing units. At the time of the on-site portion of the audit, there was three inmates identified as transgender, gay, or bi-sexual. These inmates were living in different housing units. According to the PCM, the housing was based on their individual case factors.

During the interviews with the LBGTI inmate population, none of the inmates expressed concerns about their sexual safety.

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	NDOC does not allow inmates to be placed in involuntary segregated housing based

solely on victimization concerns unless there are no other safe housing options. Administrative Regulation 573.04, states “Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made and it has been determined that there are no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing no more than 24 hours. During the weekends or holidays the on-duty Associate Warden must be notified to make appropriate arrangements. If the inmate voluntarily requests segregated housing, the inmate will be seen by classification within 72 hours of segregation. 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, the facility shall document:

The opportunities that have been limited;

The duration of the limitation; and

The reasons for such limitations.

The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged and such assignment shall not ordinarily exceed a period of 30 days. If an involuntary segregated housing assignment is made the facility shall clearly document the basis for the facility’s concern for the inmate’s safety and the reason why no alternative means of separation can be arranged. Every 30 days the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.”

SCC does not have any segregation housing. If an inmate has safety concerns at SCC, they are transferred to an alternate NDOC facility.

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Administrative Regulation 421, Prison Rape Elimination Act, section 421.09, states

that inmates, visitors, inmate family members, associates, and other community members can privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Such reporting can include, but not limited to:

Verbal complaints to any Departmental employee

Written complaints, which may be made through the following processes:

Inmate grievances

Grievances alleging staff on inmate sexual misconduct or inmate on inmate sexual abuse will be forwarded immediately to the PREA Compliance Manager and/or AW followed by a confidential report completed in NOTIS. A copy of the grievance will be forwarded to the PREA Coordinator and Office of the Inspector General for review and investigation.

Inmate kites, written notes or letters to staff or administrators,

And letter directed to the PREA coordinator or any member of the Inspector General's Office.

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

Writing the Nevada Attorney General's Office

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

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

The NDOC has an agreement with the New Mexico Department of Corrections to accept PREA allegations from NDOC inmates, family or public. This gives the inmates a chance to report PREA to another law enforcement agency that is not associated with NDOC. The contact information for the PREA Coordinator at New Mexico Department of Corrections is provided to the inmates via the PREA Information and Education Sheet, the PREA inmate handbook and it is posted on the walls in common areas around the facility. The letters and envelopes for New Mexico Department of Corrections is maintained in the Program Office and in the library.

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

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

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

SCC Operational Procedure 457, Investigative Procedures, require staff to immediately report any information about a PREA allegation to the Camp Commander and the Inspector General's Office. All of the staff interviewed knew that they are required to report any PREA allegation or information that they are aware of to the Camp Commander.

	<p>According to the representative of the IG's office that was present during the audit, staff can contact them and report confidentially. The random staff that were interviewed said that they felt that they could report confidentially to their supervisor or the PCM. Some of them said that they could also report it on the PREA hotline.</p> <p>NDOC does not house any inmates solely for civil immigration purposes.</p>
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115.52	Exhaustion of administrative remedies
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Administrative Regulation 740, Inmate Grievance Procedure, section 740.06, states that all grievances containing allegations of sexual abuse will be referred to the Inspector General's Office for investigation and they will be designated as "PARTIALLY GRANTED" indicating that it has been submitted for investigation by the Inspector General's Office. Section 740.08 removes all time frame restrictions for the filing of a grievance when the grievance alleges sexual abuse.</p> <p>Administrative Regulation 740, section 740.02, states that all allegations of sexual abuse will be referred to the inspector general's office for investigation via the First Level Grievance. If the grievance alleges sexual assault by a staff member, the inmate is not required to give the grievance to the staff member named in the grievance, nor is the inmate required to attempt to resolve the issue with that staff member. The grievance will not be forwarded to the named staff member to respond to the grievance.</p> <p>Policy requires that all grievances alleging sexual abuse are forwarded to the Inspector General's (IG) Office. The IG's Office will render a decision of the outcome of the appeal within 90 days and initiate an investigation, if appropriate. In the event that more time is needed to resolve the grievance the IG's Office may ask for a 70-day extension. If an extension is needed, the IG's Office will notify the inmate of the extension and the expected date of the reply. Upon the completion of the investigation the IG's Office will notify the inmate of the results of the investigation. If the inmate does not receive a response within the allotted time limits, the inmate may consider this a denial.</p>

NDOC and SCC's procedures do allow for third party reporting. Third party individuals could be a fellow inmate, staff member, family member, attorney or an outside advocate. If a grievance is filed via third party, the inmate is to be interviewed. The inmate must confirm the allegation and agree to the administrative remedies. If the inmate declines to have the request processed, it shall be documented in the tracking log and on NOTIS (Nevada Offender Tracking Information System).

Administrative Regulation 740, section 740.03, addresses the emergency grievance process. 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. The person responding to the Emergency Grievance alleging substantial risk of imminent sexual abuse will speak to the inmate and the response, final decision and any corrective action(s) taken (e.g. referral to the Inspector General's Office, affording the inmate appropriate medical/mental health care, addressing safety considerations) in response to the Emergency Grievance will be documented in NOTIS. All inmates alleging sexual abuse should be afforded access to medical/mental health services. Offers, acceptance, and denials of any such services will be documented, and if accepted, it will be documented that medical/mental health services were provided. Responses to Emergency Grievances alleging substantial risk of imminent sexual abuse will be forwarded to the Associate Warden or PREA Compliance Manager to follow up within two (2) days of receipt of the Emergency Grievance. The Associate Warden or PREA Compliance Manager will ensure that the grievance has been referred for investigation, the inmate has been provided appropriate medical, mental health and safety considerations have been addressed.

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

The Grievance Coordinator for SCC is located at Northern Nevada Correctional Center (NNCC). He explained how the grievance process works when there is an allegation of PREA. The inmate drops the grievance in the locked box in front of the Program Office. The caseworker collects the grievances and forwards them to NNCC for logging and processing. If the grievance alleges PREA, the caseworker notifies the PCM prior to forwarding it to the Grievance Coordinator. The coordinator scans the grievance and forwards a copy to the Warden. If the Warden agrees that it is an allegation of a PREA, he sends a copy to the PCM and the IG's office. The information is entered in NOTIS. If the IG's office initiates an investigation, the grievance is returned to the inmate with a "partially granted" response. At the conclusion of the investigation, if the inmate is still not satisfied, they may submit the appeal directly to the IG's Office as a second level appeal.

	<p>The Grievance Coordinator stated that they do not require the inmate to give the grievance to the staff member that the grievance is against, nor do they require the inmate to try to settle the grievance informally with that staff member.</p> <p>A review of the SCC investigation logs showed there were no PREA allegations received through the appeal process. There were no emergency grievances related to PREA filed during this audit period.</p>
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115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Currently SCC utilizes the Signs for Hope for victim advocacy. NDOC has a contract with Signs for Hope to provide inmates emotional support in the event of a sexual assault. The inmates receive the information via PREA Education and Information Sheet when they first arrive at the facility; additionally, there are posters on the walls of the housing units, near the telephones, and in common areas. Only about half of inmates interviewed knew about these services even though the information was visible everywhere.</p> <p>Phone calls to the IG’s office are recorded by the IG’s office only. The recordings can only be shared for investigation or security reasons. Phone calls to the Signs for Hope are not monitored or recorded. Any mail to the Signs for Hope or IG’s office is treated as legal mail and not read by the staff. This information is included on the posters, the PREA Education and Information Sheet and the PREA handbook that the inmates receive upon arrival.</p> <p>Copies of the contract, and the PREA Information and Education Sheet were provided to the auditors with the pre-audit materials.</p> <p>The Victim Advocate from Signs for Hope was interviewed telephonically. She stated that she has not had any contact with any inmates at SCC. If she were to receive a request for emotional support from an inmate at SCC, she would provide the support and teach coping skills over the phone. Currently Signs for Hope do not enter the NDOC facilities. Signs for Hope and NDOC are working on video conferencing with victims who request services. If the inmate needed direct contact during a SAFE/ SANE exam, she would request to travel to Carson City, from her director, and</p>

	<p>respond to the hospital. She further stated, that if an inmate were reporting an incident to her, she would receive consent from the inmate prior to reporting it as a third party.</p>
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115.54	Third-party reporting
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The PREA Education and Information Sheet provided to the inmates as they arrive at SCC explains that a PREA allegation can be reported to family or friends who can report on their behalf (third party reporting). This information is also on the posters in the housing units and in the visiting room. The Inspector General’s website contains this information and is available to the public.</p> <p>Administrative Regulation 421 states that inmates, visitors, inmate family members, associates, and other community members can privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.</p> <p>During the interviews with the inmates, they all knew that they could have somebody else (friend, family member or another inmate) report the allegation for them and that they could report a PREA allegation for another inmate. Most of the inmates stated that this was one of the methods that they would use to report a PREA incident.</p> <p>Every staff member stated that they would accept a third party PREA report the same as a first party report when asked. Both investigators stated that they would investigate a third-party report, just like any other allegation.</p>

115.61	Staff and agency reporting duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Administrative Regulation 421, section 421.05, requires that all staff must report immediately any knowledge, suspicion, or information regarding any incidents of</p>

sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. Staff is required to report known incidents involving both other staff and inmates. Policy also requires an employee to report any other employee's neglect or violation of responsibilities that may have contributed to an incident of sexual abuse, sexual harassment, or retaliation. SCC Operational Procedure 457, Investigative Procedures, require staff to immediately report any information about a PREA allegation to the Camp Commander and the Inspector General's Office

Medical Directive 117, Sexual Assaults, section 117.02, requires that medical staff report sexual assault or misconduct in accordance with AR 332, OP421, and PREA standards.

NDOC policy requires that all staff will accept reports from any and all sources, to include but not limited to, inmates, visitors, inmate family members, associates, and other community members. These individuals can privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

NDOC policy mandates that staff shall not reveal any information related to a sexual abuse report to anyone other than their immediate supervisor. All reports of sexual abuse to include inmates and staff are to be kept confidential. Section 421.17 states all case records associated with claims of staff sexual abuse, sexual harassment, inmate sexual abuse or any attempt thereof including written reports, investigation reports, evidence, inmate information, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment and/or counseling are confidential. OP 421, section 421.05, states that staff shall not reveal any information related to a sexual abuse report to anyone other than their immediate supervisor. All reports of sexual abuse to include inmates, staff, contractors, or volunteers are to be kept confidential.

NDOC policy requires that all allegations of sexual abuse and sexual harassment, including third party reports, be forwarded to the Inspector General's Office for review and possible investigation. The IG's Office then either assigns an investigator from the IG's Office or refers the case back to the Warden to handle the case administratively. The Warden then assigns a local investigator to investigate the allegations.

Review of the investigations showed compliance with this standard. In all cases that were reviewed by this audit team, once a staff member received an allegation, it was

immediately logged into NOTIS. This included allegations that were received via grievance, hotline, by telling a staff member or by kite. In all five cases reviewed by the audit team, each one was reported to the Inspector General’s Office on the day it was received. The Inspector General’s Office opened the investigation within 72 hours of the day it was received except in one incident. One of the sexual harassment cases, the IG’s PREA Unit neglected to assign an investigator due to a tracking error. As soon as the oversight was noticed an investigator was assigned.

All staff interviewed knew their responsibility to report all allegations of sexual abuse and sexual harassment. They stated that they would report the information immediately to the Camp Commander. They also explained that they would not share any information about a PREA incident with any other staff except of those that have a need to know (such as an investigator). The Camp Commander stated that he makes sure that all PREA allegations are entered into the Nevada Offender Tracking Information System (NOTIS). According to the Inspector General, their office receives all NOTIS entries. They would receive any PREA allegation entered in the system and immediately initiate a response by contacting the facility to provide direction or obtain additional information.

All inmates interviewed stated that they feel staff would take appropriate action if the staff received a PREA allegation. The general consensus of the inmate population is that staff take PREA allegations seriously.

SCC does not have any vulnerable adults or juveniles housed at the facility. Northern Nevada Correctional Center houses most of the elderly and infirmed inmates for the State of Nevada. Juvenile inmates are also housed at Northern Nevada Correctional Center.

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Administrative Regulation 421 states that if any NDOC employee becomes aware that an inmate is subject to a substantial risk of imminent sexual abuse, they shall take immediate action to protect the inmate. If the knowledge is obtained by receiving a verbal/written report, the employee will immediately notify the on-duty shift supervisor. If the knowledge is obtained by visual observance, the employee will initiate first responder duties in accordance with PREA guidelines. In the Sexual Assault Response procedure, it requires staff to separate the victim from the

aggressor and keep the victim safe.

If information that an inmate is at substantial risk of imminent sexual abuse is received via emergency grievance, the grievance is to be taken to the Camp Commander. The Camp Commander shall take immediate action to protect the potential victim and document their actions in NOTIS. According to Administrative Regulation 740, Inmate Grievance Procedure, the supervisor will prepare a response to the grievance.

During the interviews, staff explained what they would do if they received information that an inmate was at imminent risk of being sexually assaulted. All staff responses were variations of what the policy requires. In general, most staff responses were as follows: Based on how the information was received, they would interview the potential victim to ensure his safety. They would notify their supervisor and advise them of the situation. They would separate the potential victim from the potential predator while arrangements were made to rehouse either or both inmates or to transfer to alternate institutions. All of the actions taken would be documented in NOTIS. If the potential victim made a PREA allegation, the Inspector General's Office would be notified.

All inmates that were interviewed stated that they feel safe at SCC. The general view of the inmate population is that staff attempt to maintain a safe environment for the inmate population.

115.63	Reporting to other confinement facilities
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	Auditor Overall Determination: Meets Standard
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	Auditor Discussion
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	<p>The Nevada Department of Corrections PREA Manual, section 6.1, states that the Warden will be responsible for making the requisite notifications in the event that the reported sexual abuse occurred while confined at another institution/facility. Upon receiving an allegation that an inmate was sexually abused while confined at another institution/ facility, the PREA Compliance Manager or Associate Warden must be notified immediately. If the inmate reports that this sexual abuse had been previously reported, a review of NOTIS will be conducted, and if necessary, the PREA Coordinator will be contacted, in an attempt to ascertain if there is documentation of the report.</p>
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	<p>The Warden will notify the head of the facility or appropriate office of the agency where the alleged abuse occurred as soon as possible but no later than 72 hours after receiving the allegation. The PREA Coordinator will also be notified.</p>
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Upon receiving notification from another agency claiming that a possible PREA incident had occurred at SCC, the NDOC PREA Coordinator will notify SCC of the alleged incident. The PREA Coordinator will ensure the allegation is investigated.

According to the PCM they have not received any allegations from inmates at SCC, claiming a sexual abuse at a different facility. A review of the NDOC investigations logs did not show any sexual assaults that occurred at a different facility that were reported at SCC. There was one sexual assault case reported at a different prison that was alleged to have occurred at SCC. It was investigated by the IG's Office.

The Warden stated that he forwards any allegations that occurred at a different facility, made by inmates at SCC, to the Warden of that facility within 72 hours. He also notifies the Inspector General's Office of the allegation. He further stated that if he receives an allegation from another institution, he will make sure that it was investigated per policy.

115.64 Staff first responder duties

Auditor Overall Determination: Meets Standard

Auditor Discussion

Nevada Department of Corrections PREA Manual provides a detailed process for first responders to follow upon learning of a sexual assault. The manual states that upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report shall be required to:

Separate the alleged victim and abuser;

Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence;

If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating;

Escort the alleged victim to the medical department for assessment and to be prepared for transport to the outside medical facility SAFE/SANE Nurse if appropriate;

Take steps to prevent the alleged suspect from destroying any physical evidence.

At no time are the alleged victim and the alleged suspect to have contact with each other. The Shift Supervisor shall notify the Duty Warden as soon as practical and complete a detailed NOTIS entry and a 019 report for the Warden. The report should include all written reports related to the sexual assault or sexual activity. The incident area is secured and treated as a crime scene until released by the Warden, Inspector General or designee. If the first staff responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff.

Administrative Regulation 421, Custodial Sexual Misconduct, Inmate Sexual Offenses (PREA), section 421.20, give a detailed description of what actions staff should take when a PREA allegation is received. Upon learning of an allegation that an inmate was sexually abused, the first custody staff member to respond to the report shall be required to:

Separate the alleged victim and abuser;

Notify Shift Command (if they have not already been notified);

Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence;

If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating;

If the abuse occurred within a time period that still allows for the collection of physical evidence, 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; and

Escort the inmate victim to the Medical Department.

	<p>During the interviews with staff they were able to explain their role in the response to a sexual assault. The general response was that the staff would separate the alleged victim from the alleged suspect (if known). They would contact their supervisor and medical (if needed). They would secure the area that the incident occurred preserve the crime scene until the investigation team arrives to process the crime scene. They would request the alleged victim refrain from washing their hands, changing their clothes, showering, brushing their teeth or using the toilet to preserve any possible evidence. They would prevent the alleged suspect from washing their hands, changing their clothes, showering, brushing their teeth or using the toilet. At no time do they let the alleged victim, or the alleged suspect have communication with each other while awaiting transportation to the SAFE/SANE Nurse. The alleged victim and the alleged suspect are kept in separate rooms out of sight and ear shot from each other.</p> <p>Reviews of the incident reports and investigative reports reflect that staff at SCC follow the established policies when responding to PREA incidents. One of the allegations that were reported to staff could have required the alleged victim be transported to a SAFE/SANE Nurse for a forensic exam. The victim declined to have the SAFE/SANE exam.</p>
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115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Operational Procedure 458, Crime Scene Preservation and Investigation, provides a detailed process for a coordinated response to a physical crime, including sexual assault. The OP requires the involvement of the Shift Supervisor, the medical staff, management staff, and the Inspector General’s Office. Each classification’s responsibility for response to sexual assault is outlined in the Operational Procedure. This response includes protection of the victim, preservation of the evidence, reporting and investigation. Medical Directive 117, Sexual Assaults, directs the NDOC medical and mental health staff on what steps to take when responding to a sexual assault; prior to sending the victim to the outside medical facility and upon returning to the institution.</p> <p>According to the OP, the first responders are to preserve the crime scene and ensure the victim’s safety. They report it to their supervisor who would in turn report it to the Administration. The IG’s office would be notified and investigators would report to process the crime scene. The victim would be taken to medical for initial evaluation and then transferred to an outside hospital for SAFE/SANE exam, if appropriate. The clothing from both the victim and suspect would be processed into evidence. All staff</p>

involved are required to submit a report of what actions they took in response to the allegation.

Several different disciplines of staff were interviewed during the on-site portion of the audit. This included custody staff, medical staff, administrators, supervisors and investigators. Each of the staff that were interviewed knew their role when responding to a sexual assault. A review the PREA incident reports appears to support that staff respond appropriately to PREA incidents.

Three interviews were conducted utilizing the first responder's questionnaire. The responses to the questions were all very similar. The staff would call the camp commander, separate the victim and suspect, contact medical and preserve the crime scene. The investigators that were interviewed stated that they would report to the facility and process the crime scene, including confiscating the victim and suspect's clothing. If the alleged victim was transferred to an outside medical facility for SAFE/SANE, one of the investigators would go with the alleged victim. They would interview the victim, potential witnesses and the alleged suspect. Medical staff stated that they would treat any life-threatening injuries prior to the victim being sent to the outside hospital. They would continue any treatment once the inmate returned. During the interviews with mental health staff, they stated that they would see the victim upon return from the hospital and offer mental health treatment as necessary. All of the staff that were interviewed talked about the different types of documentation they would complete during the process.

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>On July 1, 2023, the Nevada Department of Corrections entered a Collective Bargaining Agreement (CBA) with American Federation of State and Municipal Employees (AFSME) for non-custody staff and the Fraternal Order of Police, Correctional Officers Lodge 21 for custody staff.</p> <p>The AFSME CBA section 8.11.2, states that the employer has the right to reassign employees to post assignments due to operational need and cross training. Section 8.23.3, states that the employer may temporarily change an employee's duty assignment to another work area and/or shift for five consecutive months or less. The decision of the employer to implement a short-term change in duty assignment shall</p>

	<p>be final and may not be grieved. Section 11.1.1 give the employer the right to place an employee on administrative leave.</p> <p>The FOP CBA section 9.11.1.2 and 9.12.1.2, states that the employer has the right to reassign employees to post assignments due to operational need and cross training. Section 9.17.3, states that the employer may temporarily change an employee's duty assignment to another work area and/or shift for four consecutive months or less. If at any time during the four months, the employer has legitimate business reasons to make the change in the employee's duty assignment permanent, the employer shall notify the union.</p>
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115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Administrative Regulation 421, Prison Rape Elimination Act, Section 421.13, states that no staff member or inmate who reports sexual abuse or sexual harassment or cooperates with a sexual abuse or sexual harassment investigation will be subjected to any form of retaliation from other staff members or inmates of the Department.</p> <p>The NDOC PREA Manual require that the PCM or designee shall monitor and track all inmates and staff who report sexual abuse, or cooperate with any investigation, from retaliation by both inmates and/or staff. The monitoring will include offender disciplinary reports, housing or program changes, negative performance reviews or reassignments of staff. In the case of offenders, such monitoring shall include periodic statues checks.</p> <p>The PREA Manual requires the monitoring to be conducted for at least 90 days following the report of a sexual abuse incident. The monitoring will be documented by the PCM or the designee. The monitoring can be terminated prior to 90 days if the allegation is unfounded. The monitoring will be continued past 90 days if there is need to.</p> <p>If an inmate or staff transfers to a different facility with in the 90-day monitoring period, the sending PCM will notify the receiving PCM of the monitoring needs. The sending PCM will retain the inmate/staff on the retaliation monitoring log and contact the receiving PCM for updates at 30, 60 and 90 days.</p>

The NOTIS alerts the caseworker (CCS) when an inmate's monitoring is due. All IRs regarding PREA issues will be added to the tracking log automatically. The CCS calls the inmate in and interviews him. The CCS asks the inmate if they have experienced any retaliation. They also ask the inmate if they feel safe. The CCS then reviews the inmates file to see if there have been any adverse changes to their housing, program, or disciplinary history. The information is then entered into the PREA Retaliation Monitoring tracking log. If the CCS believes that retaliation may be occurring, he reports his findings to the PCM.

All inmates and staff will be monitored for a minimum of 90 days. The PCM ensures periodic status checks are completed a minimum of once per month to ensure acts of retaliation have not occurred. The above monitoring also includes protections for third party reporters. If any institutional or facility staff members learns of or receives information that a person who cooperated with an investigation, other than an inmate or staff reporter, has expressed a fear of retaliation, the Inspector General's Office will be immediately notified.

According to the CCS and the PCM, SCC shall continue to monitor beyond the 90-day time frame if the initial monitoring indicates a continuing need. SCC shall terminate any monitoring if the agency determines the allegation is unfounded. NOTIS informs the receiving institution if an inmate is transferred to them that is currently being monitored.

The PCM shall notify the Warden of all allegations/suspicions of retaliation of Sexual Abuse and/or Sexual Harassment. The Warden shall review to determine if staff assignments shall be changed or inmate housing assignment shall be changed. The PCM shall generate an IR and enter a report within the NOTIS system for all allegations of retaliation. The report shall be referred to the Inspector General's office for investigations.

The PCM provided the audit team with the PREA Retaliation Tracking Log. The log contained the incident number, the date reported, who is being monitored, date the monitoring was initiated, dates of monitoring checks and date concluded. Next to each monitoring date is a place to document observations. Each inmate is monitored for at least 90 days or until they are released from custody. Only two of the allegations over the past two years meet the requirement for monitoring. One of these cases the victim requested to be moved from the yard on the day he made the allegation. The other case was monitored for the full 90 days. This inmate was interviewed by this auditor, and she acknowledged that she had been seen at least

	<p>every month by her CCS and asked if she felt safe. She stated that she has not experienced any retaliation.</p> <p>Both the Warden and PCM stated that they take retaliation of any type very seriously. If it is believed that retaliation for reporting a PREA were occurring, both stated that they would report it to the Inspector General's office so that it could be included in the investigation.</p>
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115.68	Post-allegation protective custody
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>NDOC does not allow inmates to be placed in involuntary segregated housing based solely on being a victim of sexual assault unless there is no other safe housing options. Administrative Regulation 573.04, states "Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made and it has been determined that there are no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing no more than 24 hours. During the weekends or holidays the on-duty Associate Warden must be notified to make appropriate arrangements. If the inmate voluntarily requests segregated housing, the inmate will be seen by classification within 72 hours of segregation. 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, the facility shall document:</p> <p>The opportunities that have been limited;</p> <p>The duration of the limitation; and</p> <p>The reasons for such limitations.</p> <p>The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged and such assignment shall not ordinarily exceed a period of 30 days. If an involuntary segregated housing assignment is made the facility shall clearly document the basis</p>

	<p>for the facility’s concern for the inmate’s safety and the reason why no alternative means of separation can be arranged. Every 30 days the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.”</p> <p>SCC does not have a segregation unit. If an inmate has safety concerns, they are transferred to a different facility.</p>
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115.71	Criminal and administrative agency investigations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Administrative Regulation 421, Custodial Sexual Misconduct, Inmate Sexual Offenses and Prison Rape Elimination Act, mandates that the NDOC, Office of the Inspector General (IG), will investigate all allegations of staff on inmate sexual abuse, sexual harassment and inmate on inmate sexual abuse within the NDOC. This includes third party and anonymous reporting of a PREA allegation. Investigators are assigned to cases via the IG’s Office as soon as a complaint is received. The investigators are trained in how to do criminal and sexual assault investigations. This includes a thorough, complete and objective investigation. Investigators assigned to investigate allegations of sexual abuse or sexual assault shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. If the case is determined to be none criminal, and does not involve staff, the IG’s Office may assign it to an investigator from the facility.</p> <p>The IG’s Office has a team of 19 investigators trained in investigating sexual assault cases. The training includes conducting sexual assault investigations in a confinement setting, interviewing victims of sexual assault, proper use of Maranda and Garrity warnings, sexual abuse evidence collection, and preparing a case for referral for prosecution. Reviewing the training record confirmed that the investigation team had all received the proper training. Local investigators who work at the institution, not assigned to the IG’s Office, receive the same training. These local investigators typically investigate inmate on inmate sexual harassment or other non-criminal cases that do not involve staff. SCC has one supervisor trained to conduct administrative PREA investigations.</p> <p>The investigators that were interviewed for this audit were able to explain the investigation process. When they are first assigned to a case, they make sure that</p>

the alleged victim is safe and receiving medical attention, including a forensic exam if needed. They report to the crime scene and collect any evidence. They also collect the evidence from the forensic exam. They review staff reports and interview the victim. They then interview the suspect (if known) and any witnesses. The investigators stated that they also review any video tapes, phone calls, documents or other relevant evidence. Once all of the interviews are completed and evidence has been reviewed, they write a report stating the facts of the case. The investigator then submits the case to the Attorney General's for possible prosecution. The Warden of the facility is provided all of the reports. The evidentiary standard to substantiate a case is preponderance of evidence.

Policy requires that all substantiated criminal cases shall be referred to the applicable prosecutorial authority for review of prosecution. This is done by the Attorney General's Office.

During interviews and discussion with investigative staff, each of them stated that the creditability of the individual being interviewed is not based on their status as an employee or offender, it is based on an individual bases. Reviewing the cases did not demonstrate that staff testimony was given more credibility than offender testimony.

NDOC policy forbids the use of any form of lie detector test when interviewing the victim. Prior to conducting a compelled interview, the investigator will consult with the Attorney General's Office for advice and direction.

The NDOC PREA Manual requires the investigations to be retained for as long as the alleged abuser is employed by the department, plus five years (when staff is the suspect) and as long as the abuser is under the control of the Department, plus five years (when an inmate is the suspect). According to the IG, all completed investigations are retained in her office for at least five years after the alleged abuser is no longer in the control of NDOC or separated from state service.

Policy states that the departure of the alleged abuser or victim from the employment of the Department or control of the institution/facility shall not provide a basis for terminating an investigation. Both investigators that were interviewed stated that they would continue with the case, even if the victim or suspect was released to the community or, in the case of an employee, the suspect resigns from the Department.

The PREA Coordinator provided summary for all 4 allegations received during 2023 and 2024 (two cases included both sexual abuse and sexual harassment allegations). The report included the report number, date of report, name of the victim, name of the suspect, and disposition or status of the case. There was one inmate-on-inmate

sexual harassment allegations, two inmate-on-inmate sexual abuse allegation, two staff-on-inmate sexual harassment allegations and one staff-on-inmate sexual abuse allegation. The audit team reviewed all four cases.

The cases that this audit team reviewed were complete. They contained the victim's statements, the suspect's statements, a list of witnesses and their statements. The investigator describes why he gives some testimony more relevance than others, for example the statement is or is not supported by facts, or the testimony is hearsay.

Each step of the investigation is documented in the summary report. If any physical or circumstantial evidence is available it is collected and described. If the victim did not identify any witnesses, attempts were made to find potential witnesses by random interviews of staff and inmates that may have been in the area. The investigator included in their report if it appeared that staff's actions or inactions contributed to the incident. All of the conclusions were supported by elements of the case.

This auditor agreed with the conclusions on all four cases. Three of the cases were unsubstantiated. The evidence collected, the victim, witness and suspects statements indicated that the sexual abuse/sexual harassment did not occur.

However, the investigator could not prove that it did not occur. The one case that was unfounded was determined not to be a PREA. The allegations that the inmate made did not meet the criteria as either sexual abuse or sexual harassment. There were no substantiated cases.

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The NDOC PREA Manual states that the Department shall impose no standard higher than a preponderance of the evidence in determining whether an allegation(s) of sexual abuse is substantiated.</p> <p>During the interviews with the investigators, they knew what level of evidence was required to substantiate a case. The Warden was also aware of these criteria. All three stated that preponderance of evidence means that the incident was more likely to have happened than not to have happened.</p> <p>A review of the investigation file supported their statements. In all four of the</p>

	completed investigations reviewed by this audit team, the facts supported the conclusions. One case was unfounded and three were unsubstantiated.
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115.73	Reporting to inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Administrative Regulation 421, Custodial Sexual Misconduct Inmates Sexual Offences and Prison Rape Elimination Act, requires that, at the conclusion of an investigation, the inmate be informed on whether the allegation has been substantiated, unsubstantiated or unfounded. Additionally, if the allegation is against a staff member, the department will inform the offender when the staff member no longer works in the unit, when the staff member no longer works at the facility, if the staff member is indicted on charges related to sexual abuse within the facility or if the staff member is convicted of on a charge related to sexual abuse within the facility. If the allegation is against another offender, the departmental policy requires the victim be notified if the perpetrator has been indicted or convicted on a charge related to sexual abuse.</p> <p>A review of the DOC 2095 includes all of the information that an inmate would need to be advised of per PREA Standard 115.73. The DOC 2095 includes the name and number of the inmate, the case number of the investigation, the date of closure, the investigation conclusion, the disposition of the alleged suspect, a place for the inmate to sign and date and a place for the staff to sign. This document also includes an area to note if a staff interpreter was utilized.</p> <p>The PMC at SCC tracks all investigations and is advised when they are concluded by the Inspector General’s Office. When the PCM receives the information about the conclusion of the investigation, he makes face-to-face contact with the alleged victim. The PCM informs the alleged victim of what the investigation results were. If the case is substantiated or unsubstantiated, and the suspect is a staff member, he advises the alleged victim if that staff member has been removed from their post, transferred from the facility, been indicted on the allegation, or convicted of the allegation. If the case is substantiated or unsubstantiated, and the suspect is an inmate, he advises the alleged victim if the suspect has been indicted on the allegation or convicted of the allegation. The alleged victim is provided a memorandum (DOC 2059) with this information. The victim and notifying staff member both sign the notification. This memorandum provides the inmate with documentation that he can include in his grievance if he chooses to pursue the case further. This interaction is documented in NOTIS.</p>

	<p>Two of the three notices (DOC 2095) that were required over the past two years were included with the pre-audit materials. The third notice to the inmate was provided at the time of the on-site portion of the audit. All of them appeared to be completed properly.</p>
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115.76	Disciplinary sanctions for staff
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The State of Nevada defines sexual abuse of a prisoner as a class D Felony. Administrative Regulation 421, Custodial Sexual Misconduct, Inmate Sexual Offenses and Prison Rape Elimination Act, section 421.14, states that NDOC staff shall be subject to disciplinary sanctions up to and including termination for violating Departmental sexual abuse or sexual harassment policies. All terminations for violations of Departmental sexual abuse or sexual harassment policies, or resignations by staff that would have been terminated if not for their resignation, shall be reported to law enforcement agencies and to any relevant licensing bodies, by the Inspector General’s office.</p> <p>Administrative Regulation 339, Code of Conduct, defined sexual abuse as a Class 5 disciplinary offence for employees. The AR requires that all Class 5 disciplinary actions result in termination, even for the first offence.</p> <p>During the interview with the Warden, he stated that it is the expectation that staff be terminated if they sexually assault an inmate, even if the inmate appears to give consent. There was one sexual abuse allegations against an NDOC employee at SCC during this audit period. The case was unfounded.</p>

115.77	Corrective action for contractors and volunteers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Administrative Regulation 421, Custodial Sexual Misconduct, Inmate Sexual Offenses and Prison Rape Elimination Act, section 421.15, states that any contractor or volunteer who engages in an activity that could be interpreted as sexual abuse shall</p>

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. The institution/facility 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.

Administrative Regulation 802, Community Volunteer Program, section 802.02, states that if circumstances suggest that a volunteer has been compromised into a personal relationship with an inmate, or through any other situation or event, that volunteer will be excluded from the institution/facility pending an investigation into the situation. A volunteer who is found to have been compromised will be permanently barred from participating as a volunteer for the Department in any capacity.

The Warden stated that he would restrict a volunteer or contractor from grounds (gate stop) if they sexually assaulted or harassed an inmate. He would report the allegation to the agency/organization that the alleged suspect worked/volunteered for and any relevant licensing board. Additionally, the volunteer or contractor would be removed from the clearance list and no longer allowed in any NDOC facility.

SCC has not received any PREA allegations against any contractors or volunteers during this audit period.

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Administrative Regulation 421, Custodial Sexual Misconduct, Inmate Sexual Offenses and Prison Rape Elimination Act, section 421.16, addresses the discipline process for inmates that are charged with sexual abuse/harassment of another inmate. The policy states that inmates shall be subject to disciplinary sanctions pursuant to Administrative Regulation 707, Inmate Disciplinary Process, following a finding that the inmate engaged in inmate-on-inmate sexual abuse, sexual harassment or consensual sexual activity. Inmates shall be subject to administrative disciplinary sanctions. Sanctions shall be 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. The disciplinary process shall consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be</p>

	<p>imposed.</p> <p>According to AR 421, section 421.14, the agency may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation. SCC prohibits all sexual activity between inmates and may discipline inmates for such activity. The Hearing Officer may not, however, deem such activity to constitute sexual abuse if he/she determines that the activity is not coerced.</p> <p>During the interview with the Warden, he stated that the inmate disciplinary process is an objective process that takes all factors into account when determining guilt or innocence of an inmate. Additionally any penalty administrated as a result of a guilty finding is within established policy. All factors, including the inmate’s mental health concerns are considered during the disciplinary process.</p> <p>SCC did not have any substantiated PREA allegations during this audit period.</p>
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115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy requires SCC staff to refer inmates for mental health evaluations if the inmate has experienced prior sexual victimization or previously perpetrated sexual abuse. Typically, the Mental Health Referral is completed by classification staff upon risk assessment screening. SCC has one mental health clinician that comes to the facility from the neighboring institution on an as needed basis. SCC has one registered Nurse assigned to the facility. Any extensive medical or mental health treatment is provided by the community hospital or Northern Nevada Correctional Center (NNCC).</p> <p>Medical INP 200, Health Care Services, section II, address how NDOC will provide medical and mental health treatment to an inmate who discloses prior victimization or predatory sexual abuse. The policy reads “All inmates will receive screenings upon initial intake (reception) and upon arrival at each institution the inmate may be transferred to during his or her incarceration. This includes adjacent camp inmates. The Inmate will be asked if he or she has experienced prior sexual abuse, whether it</p>

occurred in an institutional setting, jail, or in the community. If the inmate answers yes, staff will ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within "14 days" of the intake screening. A specialized binder will be located and maintained in the medical and mental health areas to identify the inmates in need of this follow-up.

Any information obtained from the inmate related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State or local law.

Medical and mental health practitioners shall obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18.

The Supervising Correctional Case Specialist explained the process that he uses for medical and mental health care of the inmate population. He stated that, if an inmate states that they have previously been a victim of sexual abuse, or perpetrated sexual abuse, he offers the inmate a meeting with mental health. If the inmate accepts, NNCC Mental Health Department is contacted, and an appointment is made. The Mental Health Clinician comes to SCC and sees the inmate. If follow-up is required by the mental health department, further appointments are made.

According to the documentation provided and the inmate interviews, there were 9 inmates currently housed at SCC that claimed prior sexual victimization or predatory sexual behavior. None of them requested a meeting with mental health. Three of these inmates were interviewed by the audit team. All three stated that they were offered a meeting with mental health, however they declined to see mental health.

Because SCC is a minimum camp, sex offenders are not housed at the facility.

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

SCC has one registered nurse and one on call mental health clinician. If an inmate needs acute medical care, they are referred to the medical staff at Northern Nevada Correctional Center (NNCC). NNCC has medical staff on duty 24 hours a day seven days a week. Medical INP 200, Health Care Services, states that all inmate victims of sexual abuse will receive timely unimpeded access to emergency medical/mental health treatment which will be determined by the health practitioner's professional judgment.

When an incident is of an Emergent Nature, medical staff will:

Perform a cursory, visual exam for any signs of injury, without manipulating any of the victims' body parts.

Injuries will be documented by camera and utilizing NDOC Form 2514 (Unusual Occurrence).

Victims will be offered immediate medical attention for any injuries that require treatment.

If SANE exam is requested, treatment can be deferred if it appears it will affect evidence, and the injuries are not life threatening.

Medical staff may assist in the collection of evidence, except for obtaining specimens.

When an incident is of an Emergent Nature, Mental Health staff will:

During normal working hours, mental health staff will provide an immediate consultation with the victim if requested.

After hours, in the absence of mental health personnel, medical staff can provide basic counseling and support until the victim can be seen by mental health personnel.

Victims of sexual abuse while incarcerated shall be offered timely information about

	<p>and timely access to emergency sexually transmitted infections, prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.</p> <p>All services provided for the above related treatments, shall be free of charge regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>The RN stated that if an inmate claimed to have been sexually assaulted, she would make sure his medical condition was stabilized and send him to the medical treatment center at NNCC. Once the inmate is at NNCC, they would prepare the inmate for transport to the outside facility for a SAFE/SANE exam. During her interaction with the victim, she stated that she would make her best attempt to preserve any physical evidence that may be on the victim or their clothing. Upon return from the SAFE/SANE exam, the inmate would be evaluated, both medically and mentally, at NNCC.</p> <p>None of the sexual abuse allegations reviewed, required medical or mental health intervention. This was based on the nature of the allegation or the inmate refusal of services.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>In the event of a medical or mental health concern that require follow-up treatment, the medical staff at Northern Nevada Correctional Center (NNCC) will schedule the inmate for an appointment and have the inmate either temporarily transferred to NNCC or have him transported on the day of his appointment.</p> <p>NDOC policy requires that inmates who have been victims of sexual abuse receive medical and mental health treatment as prescribed by a physician. Medical INP 200, PREA, requires that the follow-up treatment provided will be consistent with the community standard level of care. Sexual abuse victims will be offered tests for sexually transmitted infections as deemed medically appropriate. Mental health will attempt to conduct mental health evaluations of all known inmate-on-inmate abusers within 60 days of learning of the known abuse.</p>

According to the RN, if an inmate goes to the local medical facility, he will return to NNCC. NNCC would handle any follow-up orders from the community hospital. If the inmate is returned to SCC, the RH said that she would provide any medication proscribed to the inmate.

When an inmate makes an allegation of sexual abuse, the Incident Commander is supposed to refer the alleged victim to the mental health department via e-mail. The mental health department maintains a binder with a referral log. This log is then used to track the inmates that require a mental health meeting. A review of the tracking log showed that inmates are not offered a MH evaluated after reporting sexual abuse in every instance. Of the two reviewed cases, that required the offer of MH services, both had the documentation to show that an offer of MH was made. Neither victim accepted the offer.

Policy requires that the facility attempt to conduct a mental health evaluation on all inmate-on-inmate abusers within 60 days of learning of such abuse history. Because SCC is a minimum-security camp, sexual predators are not housed at the facility.

All services provided for the above related treatments, shall be free of charge regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	<p data-bbox="256 1525 544 1559">Auditor Discussion</p> <p data-bbox="256 1603 1469 1928">Administrative Regulation 421, Prison Rape Elimination Act, states that facilities shall 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. The PREA Compliance Manager will track and notify the review team upon learning of the completion of any sexual abuse/harassment investigation. Such review shall ordinarily occur within 30 days of the conclusion of the investigation and will be documented using the Sexual Abuse Incident Review 115.86 (DOC 1925).</p> <p data-bbox="256 2033 1469 2067">The SAIR shall be composed of upper-level management officials, with input from line</p>

Supervisors, Investigators, and Medical or Mental Health practitioners. The review team shall document their findings on the Sexual Abuse Incident Review 115.86 (DOC 1925). The review team shall:

Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;

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;

Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;

Assess the adequacy of staffing levels in that area during different shifts;

Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff;

Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs A-E of this section, and any recommendations for improvement and submit such report to the facility head and PREA Compliance Coordinator.

The Warden shall implement the recommendations for improvement or shall document the reason for not taking action.

There were two cases that required an SAIR over the past two years. Both SAIRs were reviewed by this auditor. One was completed within the 30-day time frame the other was late by 47 days. The minutes from the SAIR demonstrated compliance with the requirements of the standard. The SAIRs were attended by the Warden, Associate Warden, PCM, medical or MH staff and a custody supervisor. The minutes addressed all five questions required by 115.86 d(1)-d(5).

The PCM explained the process of how the committee works. He is notified that the investigation is concluded by the Warden. He sets up the committee date and invites the attendees. They discuss the incident and review the investigation. They review the location of the incident if needed. Once the committee come to a consensus they may make a recommendation for modification to physical plant, operational procedures, or staffing levels. Based on the recommendation either SCC will implement the change or request fiscal assistance from NDOC to implement the change. Neither of the investigations revealed a need to change policy, physical structure or staffing levels.

	<p>Because one of the two SAIRs was conducted late, corrective action was necessary. Since there were no pending PREA investigations, it is unlikely that SCC would be required to conduct any SAIRs during a 180-day corrective action period. After discussion with the Warden, the NDOC PC and the PCM, it was determined that documented training would be an acceptable corrective action. The PC provided SCC with the PREA Resource Center SAIR training module. On July 31, 2024, the auditor was provided training acknowledgment signed by the Warden, the PCM, and administrative staff that may participate on the SAIR Committee.</p>
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115.87	Data collection
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The NDOC PREA handbook requires that the Inspector General (IG), PREA Management Team (PMT), is responsible to collect accurate, uniform data for every allegation of sexual abuse at every institution and facility using a standardized instrument and set of definitions. The incident-based sexual abuse data shall be aggregated, at a minimum, annually. The data shall include all of the data necessary to answer all questions from the most recent version of the Survey of Sexual Victimization (SSV-2) conducted by the Department of Justice. The IG PMT shall maintain, review, and collect data as needed from all incident based documents including reports, investigation files and sexual abuse reviews. The PREA Compliance Manager maintains a record of all reports of sexual abuse at the facility.</p> <p>The State of Nevada PREA Coordinator was present during this audit, and she explained her agency's role in collecting, reviewing and maintaining the data. A review of the documents provided demonstrated compliance with this standard. The Inspector General's PREA Unit receives all of the PREA incident reports within the NDOC via the Nevada Offender Tracking Information System (NOTIS). This allows for the NDOC to ensure that all reports are consistent. The information provided to the PC is sufficient to complete the Department of Justice' Survey of Sexual Violence form. Each Prison within the NDOC uses the same set of definitions when documenting sexual assault and sexual harassment within the corrections system.</p>

115.88	Data review for corrective action
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The NDOC PREA Manual requires that the Director, or designee, Deputy Director of</p>

	<p>Operations, and the IG PREA Coordinator review the data in order to assess and improve, if necessary, the effectiveness of its sexual abuse prevention, detection and response policies practices and training. This review includes identifying problem areas, taking corrective action on an ongoing basis and preparing an annual report of its findings and corrective actions for each facility and the department where inmates may be present.</p> <p>The report shall include a comparison of the current year’s data and corrective action with those from prior years and shall provide an assessment of the department’s progress in addressing sexual abuse. The Department’s report must be approved by the Director and made readily available to the public through the Department’s public website. Prior to placing any reports on the Department’s website, all personal information of the victims and subjects are redacted.</p> <p>The 2015 through 2023 reports was reviewed by this auditor. The report contained the PREA data on each of the NDOC facilities, identifying problem areas, any corrective action taken and the effectiveness of the sexual abuse prevention program. The report did not contain any confidential information such as victim’s information. The 2015, through 2023 reports are posted on the NDOC, Inspector General’s website. The web site is doc.nv.gov. Click on “PREA Management Division” and then select “PREA Incidents and Annual Reports.”</p>
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115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>All of the PREA data is maintained in the Inspector General’s Office. According to policy the data is maintained 10 years. The aggregated data is maintained on the NDOC website. There are no personal identifiers included in the information posted.</p> <p>According to the PREA Coordinator, they maintain the documents in their headquarters for over ten years. A review of the data available to the public, there were no personal identifier included in the information.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard

	<p>Auditor Discussion</p> <p>The NDOC website contains the results of all of the PREA audits conducted since 2015. A review of these audits appears to show that all of the facilities operated by NDOC are audited every three years. A list of facilities and when the PREA audits were conducted was provided to the auditors by NDOC. The list includes 15 facilities that are currently open (and three that have been closed). Because of COVID, the number of facilities that were audited each year is unbalanced. Six of the facilities were audited in 2021-22, three in 2022-23, and six in 2023-24 (including SCC).</p> <p>During this audit, the auditor had access to, and toured, the entire facility. This auditor had access to every inmate, staff member, volunteer and contractor that this auditor requested to interview. The interviews were all conducted in the privacy of a staff office either in person or telephonically. Inmates and staff were allowed to send confidential correspondence to this auditor, if they wished. No letters were received by this auditor.</p> <p>During the audit, the audit team interviewed 30 inmates (12 from specialized categories) and 30 staff (16 from specialized categories). The auditor reviewed 20 inmate files, 21 staff files (including training records) and four investigations. Any documentation that was requested by the audit team was provided in a timely manner by the NDOC PC or the CCF PCM.</p> <p>The auditor did not receive any correspondence from any inmates or staff prior to, or during the audit.</p>
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The NDOC website contains a copy of the previous audit conducted at SCC. The audit was completed on March 5, 2022.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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