

PREA Facility Audit Report: Final

Name of Facility: Gordon Correctional Center

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 12/06/2017

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" 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 checked="" type="checkbox"/>
Auditor Full Name as Signed: Kimberly Napier	Date of Signature: 12/06/2017

AUDITOR INFORMATION	
Auditor name:	Napier, Kim
Address:	
Email:	NapierK@michigan.gov
Telephone number:	
Start Date of On-Site Audit:	08/21/2017
End Date of On-Site Audit:	08/23/2017

FACILITY INFORMATION	
Facility name:	Gordon Correctional Center
Facility physical address:	10401 East County Road G, Gordon, Wisconsin - 54838
Facility Phone	715-376-2680
Facility mailing address:	
The facility is:	<input type="radio"/> County <input type="radio"/> Federal <input type="radio"/> Municipal <input checked="" type="radio"/> State <input type="radio"/> Military <input type="radio"/> Private for profit <input type="radio"/> Private not for profit
Facility Type:	<input checked="" type="radio"/> Prison <input type="radio"/> Jail

Primary Contact			
Name:	Christine Suter	Title:	Superintendent
Email Address:	Christine.Suter@wisconsin.gov	Telephone Number:	715-376-2734

Warden/Superintendent			
Name:	Christine Suter	Title:	Superintendent
Email Address:	Christine.Suter@wisconsin.gov	Telephone Number:	715-376-2734

Facility PREA Compliance Manager			
Name:	Christine Suter	Email Address:	Christine.Suter@wisconsin.gov

Facility Health Service Administrator			
Name:	Lon Becher	Title:	Bureau of Health Services Nursing Coordinator
Email Address:	Lon.Becher@wisconsin.gov	Telephone Number:	608-240-5144

Facility Characteristics		
Designed facility capacity:	89	
Current population of facility:	90	
Age Range	Adults: 21-64	Youthful Residents:
Facility security level/inmate custody levels:	Minimum/Minimum Community	
Number of staff currently employed at the facility who may have contact with inmates:	16	

AGENCY INFORMATION	
Name of agency:	Wisconsin Department of Corrections
Governing authority or parent agency (if applicable):	State of Wisconsin
Physical Address:	3099 East Washington Avenue, Madison, Wisconsin - 53707
Mailing Address:	PO Box 7925, Madison, Wisconsin - 53707
Telephone number:	(608) 240-5000

Agency Chief Executive Officer Information:			
Name:	Jon Litscher	Title:	Secretary
Email Address:	Jon.Litscher@wisconsin.gov	Telephone Number:	(608) 240-5065

Agency-Wide PREA Coordinator Information			
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Name:	Cheryl Frey	Email Address:	cheryl.frey@wisconsin.gov
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AUDIT FINDINGS

Narrative:

The auditor's description of the audit methodology should include a detailed description of the following processes during the pre-audit, on-site audit, and post-audit phases: documents and files reviewed, discussions and types of interviews conducted, number of days spent on-site, observations made during the site-review, and a detailed description of any follow-up work conducted during the post-audit phase. The narrative should describe the techniques the auditor used to sample documentation and select interviewees, and the auditor's process for the site review.

The Prison Rape Elimination Act (PREA) audit for the Gordon Correctional Institution (GCC) in Gordon, Wisconsin was conducted on August 21st, 22nd, and 23rd, 2017. The facility was audited by Department of Justice (DOJ) Certified PREA Auditor Kimberly Napier with the assistance of MDOC PREA Analyst Wendy Hart. The audit was conducted to assess the facility compliance with the DOJ PREA standards as part of a consortium agreement between the states of Wisconsin, Maryland, Pennsylvania and Michigan. This is the second time that GCC has been audited by a DOJ certified PREA auditor. The audit process encompassed three phases, the pre-audit, on-site audit and post audit.

On July 5, 2017 during the pre-audit phase, the auditor provided Superintendent and PREA Compliance Manager (PCM) Christine Suter a audit notification flyer to post throughout GCC. The auditor requested that the facility post the notification within every housing unit and any other location available to inmates. The audit notification provided staff, inmates and the public with the auditor's contact and audit information to send confidential correspondence to the auditor prior to the on-site audit. On July 5, 2017 the auditor did receive confirmation from PCM Suter that the auditor notice was posted for inmates. The auditor did not receive any letters during the pre-audit phase.

On July 28, 2017, the pre-audit questionnaire (PAQ) was made available through OAS. The PAQ consisted of the agency and facility contact information, facility characteristics, organizational chart, agency and facility policy and procedures, physical plant diagrams, and staffing plan. A review of the the facility website and any online information regarding GCC was completed prior to the on-site audit.

On August 21, 2017 during the on-site audit phase, the auditors were greeted and introductions were made by the administrative staff at GCC in Superintendent Christine Suter office located in a secure area of the administration building. GCC staff in attendance during the meeting was Christine Suter, Superintendent and PCM; Eric Lund, Captain and Leigha Weber, Agency PREA Program and Policy Analyst Advanced. The purpose of the audit and the plan for two and a half days was discussed. The audit consisted of a complete tour of the facility on August 21st, interviews with staff and inmates were conducted on August 21st, 22nd and 23rd along with documentation reviews, and a post-audit meeting on August 23rd at 10:00am. During the introductory meeting, the auditors received additional facility documentation and an overview of the facility operations. The documentation consisted of the facility aerial map of GCC, staff roster, inmate rosters, overview of of the facility and work release programs.

On June August 21, 2017 at 9:30am, a facility tour of all areas that staff and inmates have access was conducted under the escort of the facility Superintendent and PREA Compliance Manager Christine Suter. Prior to entering the facility auditors were instructed to sign in. Prior to entering the secure area of the facility, control center staff checked the identification cards of the auditors. This process gave insight to the auditors on staff procedures for processing persons in and out of the facility.

The tour included the administration building, control center, visiting room, housing units dorms, staff offices, dining hall, food service, medical, laundry, commissary, barbershop, basement storage area, food service director office, Employment Services Specialist office (ESS), property and clothing room, dayroom, gym, maintenance garage, wood shop, school, library, mailroom, social worker offices, inmate toilet and shower areas.

During the tour, the auditor observed the PREA audit notification and the agency PREA informational signs (English and Spanish) for inmates posted in housing dorms, hallways as well as other locations to which staff, inmates and the public have access. The auditor was able to review several housing unit logbooks, supervisory rounding logs, PREA assessment screening tools, and video monitoring systems located in the control center. The auditor was able to see and hear the blue PREA light and tone for announcing staff of the opposite gender entering the secure facility where the housing dorms are located. The auditor was able to conduct informal interviews of staff and inmates during the tour to assess the facility practice and compliance with DOJ PREA standards. All inmates interviewed knew how to report an allegation of sexual abuse or sexual harassment internally or externally. All prisoners interviewed knew of at least one way to report. When speaking with facility staff, they stated they were trained on the agency's PREA policy, knew the protocol for reporting and how to protect an inmate from sexual abuse and sexual harassment. These interviews gave the auditors insight into assessing the facility's culture and compliance with DOJ standards.

The auditors observed the facility security staff monitor the camera system throughout the prison. The control center staff controlled and monitored the camera system. The auditor was able to observe the multiple roles staff at GCC have within the prison. The auditor was able to observe how security staff controlled inmate movement within the dorms and hallways, during the work release program, gym and outside yard. GCC did not have any inmate visits during the time the auditor was at GCC. The auditor reviewed ten inmate files for risk screening and inmate education that verified both are being completed. Also, the auditor was able to verify through a random sample that employees' training records and background checks were in compliance.

The facility staff and inmate interviews were conducted on August 21st, 22nd and 23rd, 2017. The two hour Warden's interview was conducted via teleconference on August 29, 2017 with DOJ Certified auditor Kimberly Napier. The interviews were conducted utilizing the DOJ PREA Compliance Audit instrument interview guides for facility warden, specialized staff, facility PREA Compliance Manager, random staff and inmates. All interviews were conducted in a private setting to protect the confidentiality of each interview.

At the time of the on-site audit, there were 93 inmates on count at GCC. There were 88 in-house inmates and five inmates in temporary lock up in the Douglas county jail. The auditor randomly selected and interviewed two inmates from each dormitory based on a random selection and job assignment from the unit locators provided by GCC facility staff for a total of 13 inmates with one inmate refusing interview. Using the DOJ audit instrument interview guides, the auditor was able to query inmates about their understanding of PREA, reporting protocols at the facility and services available to them outside of the facility. During the time of the audit, there was no disabled inmates, no limited English proficient, no LGBTI, no inmates that reported sexual abuse, or inmates that reported prior victimization during risk assessment.

The auditor selected and interviewed eight random staff from each shift (6am-2pm, 2pm-10pm and 10pm-6am). All staff was selected from a daily roster provided by GCC staff. In addition, the auditor

selected and interviewed 14 specialized staff. The specialized staff consisted of: one higher level facility staff; one medical; two investigative staff; two incident review team member; one retaliation monitor; one human resource staff; two staff that perform risk screening; one volunteer; one contractor; one intake staff and one victim advocate. Using the DOJ audit instrument interview guides, the auditor was able to query staff regarding the agency's Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) policy and the facility's procedures for responding, reporting and investigating sexual abuse and sexual harassment in confinement. The auditor was able to conduct a formal interview with a volunteer and contractor. The auditor was not able to interview specialized staff in mental health or segregated housing staff as GCC does not have mental health staff or a segregation unit. In addition, the auditor was not able to interview staff that supervise youthful inmates or education and program staff who work with youthful inmates as youthful inmates are not housed at GCC.

On August 23, 2017, a post audit meeting was conducted with facility administrative staff. The administrative staff in attendance was Superintendent and PCM Christine Suter and PREA Program and Policy Analyst Leigha Weber. During the post audit meeting, auditors provided facility staff with observations and four recommendations. First, the auditor recommended that the facility remove the bifold doors in the library as it created a blind spot between the school area and library. Second, the auditor recommended that the facility staff address the kitchen supervision in the stairway, staff rounds and the cooler freezer area in the basement of the kitchen. Third, the auditor recommended staff receive clarification regarding the agency's policy regarding the use of inmate interpreters. Finally, the auditor recommended that PREA education posters be placed in additional locations in the facility. The agency noted that they were in the process of implementing a statewide electronically stored prescreening process on October 22, 2017. The facility staff made immediate changes as a result of the recommendations.

On September 15, 2017, the auditor received email correspondence from superintendent Suter that confirmed the agency communicated Limited English Proficiency (LEP) information to all GCC staff via email including Executive Directive 71, DAI 300.00.61 and training information available on Cornerstone. GCC administration also confirmed and provided photos that library doors were removed to eliminate possible blind spot in the library. Also, instituted a security sign in log for the kitchen when rounds are being conducted in cooler, freezer and stairwell. GCC administration indicated that a mirror was also being ordered for the kitchen area stairwell. PREA signs in the gym was relocated to another wall in the gym for better visibility and additional signs were posted in the bathroom, social workers offices, dining, visiting, by inmate telephones and health service unit.

On November 21, 2017, the auditor received via email correspondence from the agency regarding the new statewide automated rescreening process. Specifically, the auditor was able to review two within 72 hours risk assessment and two within 30 day rescreening that confirms the facility practice with 115.41.

During the pre-audit, on-site audit and post audit the auditors were able communicate openly through interviews, phone calls and emails with facility staff. GCC staff was prepared and organized for the audit and made all documentation available to the auditors for review. The auditors would like to thank Warden Quala Champagne, Superintendent Christine Suter, Agency PREA Analyst Leigha Weber and the staff at the Gordon Correctional Center for their commitment to making GCC a sexually safe environment.

AUDIT FINDINGS

Facility Characteristics:

The auditor's description of the audited facility should include details about the facility type, demographics and size of the inmate or resident population, numbers and type of staff positions, configuration and layout of the facility, numbers of housing units, description of housing units including any special housing units, a description of programs and services, including food service and recreation. The auditor should describe how these details are relevant to PREA implementation and compliance.

FACILITY CHARACTERISTICS

The Gordon Correctional Center (GCC) was built in 1932 and was initially used to relieve overcrowding at the Wisconsin State Prisoner located in Waupun. In 1962, GCC became part of the Wisconsin Correctional Center System. There are currently 14 centers a part of the Wisconsin Correctional Center System. GCC is located in Gordon, Wisconsin. The Gordon Correctional Center is a minimum security adult male facility in a rural setting. The age range of inmates is 21-64. At the time of the audit, there were no youthful inmates being held at GCC.

GCC has six dormitory housing units. Each dormitory is designed to double bunk between 8 to 18 inmates. The inmates share a community bathroom that has showers, toilets and sinks. GCC has one day room, gym, food service, barbershop, commissary, healthcare, library, school, wood shop, unit laundry, social worker office, maintenance building, visiting room, and outside visiting area.

The facility has a staff population of 16. The correctional staff positions is one captain and 11 sergeant. The correctional staff work in the control center, visiting room, dining/kitchen area, intake, dormitory and commissary. During the audit, there were 88 inmates on August 21st, 88 on August 22nd and 88 on August 23, 2017. GCC has a facility capacity count of 89.

GCC is a work release program that inmates are hired by local employers in the community. Also, employment is available within the center working in food service, library and maintenance. GCC also offers an opportunity for inmates to earn their High School Equivalency Diploma. The facility has a video monitoring system that is controlled by the correctional staff in the administration building control center. The cameras monitor and record inside and outside of the prison.

AUDIT FINDINGS

Summary of Audit Findings:

The summary should include the number of standards exceeded, number of standards met, and number of standards not met, along with a list of each of the standards in each category. If relevant, provide a summarized description of the corrective action plan, including deficiencies observed, recommendations made, actions taken by the agency, relevant timelines, and methods used by the auditor to reassess compliance.

Auditor Note: No standard should be found to be "Not Applicable" or "NA". A compliance determination must be made for each standard.

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

Wisconsin Department of Corrections Agency Executive Directive 72 is the written Prison Rape Elimination Act (PREA) Sexual Abuse and Sexual Harassment in Confinement Policy.

Number of standards exceeded: 0

Number of standards not met: 0

Number of standards not applicable: 1

115.14 Youthful Inmates- GCC does not have inmates under the age of 18.

Number of standards met: 42

115.11 Zero tolerance of sexual abuse and sexual harassment PREA Coordinator.

115.12 Contracting with other entities for the confinement of inmates.

115.13 Supervision and monitoring.

115.15 Limits to cross- gender viewing and searches.

115.16 Inmates with disabilities and inmates who are limited English proficient.

115.17 Hiring and promotion decisions.

115.18 Upgrades to facilities and technologies.

115.21 Evidence protocol and forensic medical examinations.

115.22 Policies to ensure referrals of allegations for investigation.

115.31 Employee training.

115.32 Volunteer and contractor training.

115.33 Inmate education.

115.34 Specialized training: Investigations.

115.35 Specialized training: Medical and mental health care.

115.41 Screening for risk of victimization and abusiveness.

115.42 Use of screening information.

115.43 Protective custody.

115.51 Inmate reporting.

115.52 Exhaustion of administrative remedies.

115.53 Inmate access to outside confidential support services.

115.54 Third- party reporting.

115.61 Staff and agency reporting duties.

- 115.62 Agency protection duties.
- 115.63 Reporting to other confinement facilities.
- 115.64 Staff first responder duties.
- 115.65 Coordinated response.
- 115.66 Preservation of ability to protect inmates from contact with abusers
- 115.67 Agency protection against retaliation.
- 115.68 Post -allegation protective custody.
- 115.71 Criminal and administrative agency investigations.
- 115.72 Evidentiary standard for administrative investigations.
- 115.73 Reporting to inmates.
- 115.76 Disciplinary sanctions for staff.
- 115.77 Corrective action for contractors and volunteers.
- 115.78 Disciplinary sanctions for inmates.
- 115.81 Medical and mental health screenings history of sexual abuse.
- 115.82 Access to emergency medical and mental health services.
- 115.83 Ongoing medical and mental health care for sexual abuse victims and abusers.
- 115.86 Sexual abuse incident reviews.
- 115.87 Data collection.
- 115.88 Data review for corrective action.
- 115.89 Data storage, publication, and destruction.

Standards

Auditor Overall Determination Definitions

- 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

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.

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines the Wisconsin Department of Corrections has zero tolerance for sexual abuse, sexual harassment and report-related retaliation in its facilities, including those with which it contracts for the confinement of offenders. Further:</p> <p>The DOC provides a coordinated victim-centered response to reports of sexual abuse and sexual harassment. This includes providing medical and mental health services to victims of sexual abuse and sexual harassment while investigating all allegations. The DOC provides multiple avenues to report allegations of sexual abuse and sexual harassment and, further, recognizes the right of employees and offenders to be free from retaliation for reporting sexual abuse and sexual harassment. The DOC trains all staff members, contractors and volunteers to recognize, respond to and report sexual abuse and sexual harassment.</p> <p>The DOC provides offenders with a comprehensive orientation that details their right to be free from sexual abuse, sexual harassment and report-related retaliation. The Agency's Executive Directive #72 Sexual Abuse and Sexual Harassment in Confinement Prison Rape Elimination Act (PREA) was revised on January 11, 2016. (a).</p> <p>Agency Executive Directive #72 outlines that the DOC shall employ or designate a PREA Director to oversee department efforts to comply with PREA standards. This position shall have sufficient time and authority to coordinate the facilities efforts to comply with PREA standards in all of its facilities (b).</p> <p>The Agency employed a Agency-Wide PREA Coordinator (Cheryl Frey) who reports to Assistant Deputy Secretary in the organizational chart for the Department of Corrections Secretary's Office. Prior to PREA Coordinator Cheryl Frey's appointment, the agency employed an acting Agency-Wide PREA Coordinator (Leigha Weber) who is also the PREA Program & Policy Analyst Advanced for the Wisconsin Department of Corrections. She reports that her position is a dedicated position and that she has sufficient time and authority to the development and implementation of agency efforts in PREA compliance. The agency has 38 PREA Compliance Managers, throughout the state, and each of them have a backup. As the Agency-Wide PREA coordinator, she interacts with all of the PREA Compliance Managers (b).</p> <p>Agency Executive Directive #72 outlines that the appointing authority or designee at each facility shall assign one employee as the facility based PREA Compliance Manager with sufficient time and authority to coordinate the facilities efforts to comply with PREA standards (c).</p> <p>The Gordon Correctional Center employs an upper level administrator (Superintendent Christine Suter) as the PREA Compliance Manager (PCM). Superintendent Christine Suter states she has enough time to manage all her PREA related responsibilities and communicates with staff and inmates on a daily basis. During an interview, PCM, Suter states she monitors staff training, performance evaluations, reviewing documents, any incident reports, conducting unannounced rounds on all shifts, talking to inmates and sharing any new information she received from the PREA office to staff and inmates. The organizational chart</p>

verifies that the facility has designated who reports directly to the Warden Quala Champagne (c).

Based on the evidence, the facility has demonstrated compliance with the standard

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Wisconsin Department of Corrections (DOC) has a Memorandum of Agreement for the temporary housing of doc inmates within County Sheriff Jail. The DOC has included the jail's obligation to comply with the PREA standards. The DOC contract is with ten county jails for the confinement of DOC inmates. The county jails provides temporary hold and overflow beds for DOC inmates. All of these contracted agencies are required to comply with PREA Standards (a).</p> <p>A review of the agreement confirms that the agency does have an obligation to comply with the Prison Rape Elimination Act (PREA). The jail shall have policies and procedures in place for responding to sexual abuse or sexual harassment allegations as defined by PREA and shall have policies and procedures for maintaining reports and records necessary for reporting data consistent with PREA. Specifically, the sheriff agrees to timely completion of the Bureau of Justice Statistics Annual Survey on Sexual Victimization and or its current equivalent survey. This includes completing forms for locally or privately operated adult facilities and individual forms for each incident. The sheriff shall notify the DOC within 24 hours of any sexual abuse or sexual harassment allegations as defined by PREA (a).</p> <p>The contract includes the DOC process on conducting compliance reviews. The review may include an examination of the Sheriff's incident and offender records related to sexual abuse and sexual harassment. The agency monitors compliance by having each jail submit a summary of the PREA compliance (b).</p> <p>A review of the agency compliance letters and THE PREA compliance summary is consistent with provision (b).</p> <p>Based on the evidence, the facility has demonstrated compliance with the standard.</p>

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Wisconsin Department of Corrections agency policy Executive Directive #72 states that each facility shall develop, document and make its best efforts to comply with a staffing plan that provides for adequate levels of employees, video monitoring to protect offenders against sexual abuse (a)-1.</p> <p>The Gordon Correctional Center (GCC) staffing plan dated July 2017 was provided for review. The staffing plan contains offender populations, physical plant, camera placement, staff supervision of inmates, staffing levels, security measures, vulnerable areas, volunteer/contractor supervision, and addressing staff shortages (a). The average daily number of inmates on which the staffing plan was predicated was 90. The daily number of inmates on August 21, 22 and 23 2017 was 88 (a) 2- 3.</p> <p>GCC is allotted one superintendent, one captain, eleven sergeants, one food service leader one maintenance, one work release coordinator, two social workers (one works part-time) and two nurses (a). GCC is a work release program that inmates are hired by local employers in the community. Also, employment is available within the center working in food service, library and maintenance. GCC also offers an opportunity for inmates to earn their High School Equivalency Diploma (a). During the last 12 months, GCC did not have any reported sexual abuse or sexual harassment complaints. GCC has not had any judicial findings of inadequacy from internal or external oversight bodies to confirm the agency practice with this provision (a).</p> <p>An annual review of GCC staffing plan was conducted on 7/20/17 with the PCM and agency (c). During interview, the PCM confirmed that the staffing plan is stored electronically and reviewed annually by higher level teams (c).</p> <p>During an interview with PCM, GCC staffing pattern is two/ two minimum. GCC receives support from other correctional centers in St Croix, Black River, Flambeau and McNaughton for overtime if we need it (a, c). During interview with the superintendent, shift reports are checked and if they are short they would higher for overtime. There has been some situations due to medical emergencies that we would notify the on call and shut the facility down for a short period of time.</p> <p>Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that supervisory staff shall conduct and document unannounced rounds, covering all shifts to identify and deter employee sexual abuse and sexual harassment. The DOC employees are prohibited from alerting other employees that these supervisory rounds are occurring unless such announcement is related to the legitimate operational functions of the facility (d).</p> <p>GCC staffing plan outlines that the vulnerable areas with minimal security staff supervision such as the education building, laundry room, and food services area in the basement have increased security staff rounds (d). During an interview with staff, the superintendent does weekly rounds multiple times a week on all three shifts. Staff indicated that they put the rounds in the log book and document on a shift report. Upper level management staff indicated that</p>

they conduct rounds without telling staff that the rounds are being made. The Warden, Deputy Warden and Security Director does site visits. During these site visits they conduct rounds and look at the technology needs and physical plant with the superintendent and grounds supervisor (c, d).

During the tour, rounding logs books and shift activity reports reveal that intermediate-level and higher level staff are making required rounds consistent with this provision (d).

Based on the evidence, the facility has demonstrated compliance with this standard.

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that youthful inmates shall not be placed in a housing unit in which they have sight, sound or physical contact with any adult offender through use of a shared dayroom or other common space, shower area or sleeping quarters. In areas outside of housing units, DOC shall either: maintain sight and sound separation between youthful inmates and adult offenders or provide direct staff supervision when youthful inmates and adult offenders have sight, sound or physical contact. Adult facilities shall make best efforts to avoid isolating youthful inmates to comply with this provision. Absent exigent circumstances, adult facilities shall not deny youthful inmates daily large muscle exercise and any legally required special education services to comply with this provision. Youthful inmates shall also have access to other programs and work opportunities to the extent possible. Such exigent circumstances leading to the denial of large-muscle exercise, legally required education services and/or other programming shall be documented (a, b, c).</p> <p>During interview with superintendent, Gordon Correctional Center (GCC) does not house youthful inmates.</p> <p>A review of Agency policy DAI 302.00.20 Placement of Juveniles in Adult Correctional Sites indicate that juveniles will not be housed in adult correctional facilities. GCC is an adult correctional Center that has adult inmates between the ages of 21-64.</p> <p>Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines facilities shall not permit cross-gender strip or body cavity searches except in exigent circumstances or when performed by medical practitioners (a). Except in exigent circumstances, adult facilities shall not permit cross-gender pat-down searches of female offenders nor shall juvenile facilities permit cross-gender pat-down searches of either gender (b). All cross-gender strip and body cavity searches, in addition to cross-gender pat-down searches of females, shall be documented (c). Facilities may not search or physically examine a transgender or intersex offender for the sole purpose of determining the offender’s genital status. If the offender’s genital status is unknown, it may be determined during conversations with the offender, 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 (e).</p> <p>Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines in order to enable offenders to shower, perform bodily functions and change clothing without non-medical employees of the opposite gender viewing their breasts, buttocks or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks, employees of the opposite gender shall announce their presence when entering an offender housing unit. If opposite gender status quo changes during that shift then another announcement is required. Facilities shall not restrict access to regularly available programming or other out-of-cell or housing unit opportunities in order to comply with this provision (d).</p> <p>There are 14 camera in use at GCC that monitor inside and outside of the facility. During the tour the auditors was able to view the camera system in control center. The camera system has the ability to record and pan. The viewing of the camera doe not allow staff of the opposite gender to view inmates in the state of undress. Employees of the opposite gender must announce their presence when entering into the facility by control center staff turning on a blue light and by pushing the tone button. The blue light comes on in the inmate main hallway outside the inmate bathrooms. During the tour, the auditor was able to see how this process worked (d).</p> <p>Interviews with staff reveal that cross gender strip searches is a part of their training and they have yearly updates. There were no instances cross-gender strip searches, body cavity searches, within the last 12 months. A review of training records verified that all custody staff are trained consistent with this provision (a)(c). Staff also indicated that they turn on the blue light and push the tone button when female staff cross the threshold (door between the lobby area and the temporary lock up cells) (d). Staff indicated that there was not any transgender inmates currently at GCC. Staff verified that it is not permitted to search or physically examine a transgender or intersex offender for the sole purpose of determining the offender’s genital status (e). Training records for ten staff were reviewed to verify that all custody staff are trained in the agency's PREA policy. Also, training lesson plan Introduction to body searches was reviewed that outlines the security staff training on how to conduct cross-gender dysphoria searches, and searches of transgender and intersex inmates, in a professional and respectful</p>

manner, and in the least intrusive manner possible, consistent with security needs (e, f).

GCC does not house female inmates confirm the agencies practice with this provision (b).

Based on the evidence, the facility has demonstrated compliance with this standard.

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that Offenders with disabilities or who have limited English proficiency shall have an equal opportunity to participate in or benefit from all aspects of the DOC's efforts to prevent, detect and respond to sexual abuse and sexual harassment. This includes providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary, in addition to the provision of offender education in formats accessible to all. Written materials shall be provided in formats or methods that ensure effective communication with offenders with disabilities (a, b). Agency Division of Audit Institutions (DAI) Policy 300.00.35 Americans with Disabilities Act outlines that DAI shall ensure fair and suitable treatment of inmates and members of the public with disabilities who seek access to DAI services, programs or activities (a).</p> <p>PREA auditor notification and PREA information was posted in thought the facility regarding an inmates right to be free from sexual abuse and harassment in English and Spanish. Areas include dormitory hallways, dayroom, dining hall, school, visiting room, social worker offices and healthcare. (a, b).</p> <p>Agency Division of Audit Institutions (DAI) Policy 300.00.61 Language Assistance for Limited English Proficiency (LEP) Inmates outlines that DAI shall comply with Federal law under Title VI which requires all recipients of federal funds to provide meaningful access to documents, services and programs for individuals with Limited English Proficiency (b).</p> <p>There were no inmates at the facility during the onsite audit that was LEP or disabled. However, the inmate Sexual Abuse and Sexual harassment handbook is provided to each inmate at GCC during inmate orientation. Also, GCC contacts with a language Translation/Interpretation Service that assist inmates in foreign language and American sign Language. A copy of the contact was reviewed to confirm the agencies practice (a,b).</p> <p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that a facility first responders shall not rely on offender interpreters, offender readers or other types of offender assistants except in exigent circumstances where an extended delay in obtaining an effective interpreter could compromise the offender's safety, the performance of first-responder duties or the investigation of the offender's allegations. The exigent circumstances in which offender assistants are used shall be documented (c).</p> <p>Staff were interviewed. Some staff confirmed that inmate interpreters were not used and some was not sure if an inmate interpreter could be used. Clarification regarding the agencies policy was recommended to be sent to all staff during the end of the on site audit. On September 19, 2017, staff was provided the interpreter usage clarification with Executive Directive #71 Language assistance Policy and Implementation for addressing Needs of Offenders with Limited English Proficiency (LEP) (c).</p> <p>Based on the evidence, the facility has demonstrated compliance with this standard.</p>



115.17	Hiring and promotion decisions
	<p data-bbox="252 168 901 201">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 246 526 280">Auditor Discussion</p> <p data-bbox="252 324 1484 873">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the DOC shall not hire or promote anyone who has engaged in sexual abuse in a confinement facility; has been convicted of engaging or attempting to engage in nonconsensual sexual activity in the community; or has been civilly or administratively adjudicated to have engaged in activity described above. The DOC shall consider any incidents of sexual harassment when determining whether to hire, promote or enlist the services of any employee (a, b). Prior to hiring new staff members and enlisting the services of any employee who may have contact with offenders, the DOC shall perform a criminal background records check (c). The DOC shall make its best effort to obtain (and, when requested, provide) reference information from all prior institutional employers on substantiated allegations of sexual abuse or sexual harassment or any resignation during a pending investigation of a sexual abuse allegation (c, h). The DOC shall conduct a criminal background records check every five years for current employees (e).</p> <p data-bbox="252 929 1468 1556">Interview with Human Resource (HR) staff for Wisconsin Correctional Centers verified that back ground checks are being completed. HR staff reported that they are responsible for doing background checks on any employee or contractor. If anything shows up on a new hire background for criminal misdemeanor, the HR Manager reviews for final decision. Staff background checks every five years. The system will print out a report on what staff needs to be done and the correctional centers administrative Captain will complete the fingerprint checks on staff. Staff indicate that HR stated they do not complete background checks for the volunteers because the correctional center staff complete them. In the past 12 months, four new staff and two contracted service providers had criminal background checks. Background checks are kept for one year after hire in a secure location in HR. The facility does impose upon employees a affirmative duty to disclose misconduct. Even moving violations three or more in a two years are required to be reported if you operate a state vehicle. The only time you would not have to report is if you were the victim. There is no law that prohibits information for a former employee from being shared upon request at another institution. Former employee must go through the same process as the new hire. (a-h).</p> <p data-bbox="252 1612 1476 1691">During the last 12 months, GCC has not had any allegation or investigation of sexual abuse or sexual harassment (h).</p> <p data-bbox="252 1747 1476 1904">In the past 12 months, GCC has two contracts for services where the providers and four staff would have contact with inmates. All six have had criminal background record checks (d). Five background checks were reviewed for staff at GCC which verifies the facility compliance with this provision (a).</p> <p data-bbox="252 1960 1348 1993">Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>During the tour, GCC has 14 cameras throughout the facility. The control room is located adjacent to the visiting room and the entrance to the inmate living area. Retention of video is approximately two weeks. Cameras are installed in all common areas with inmate access and are available to be monitored and recorded by security staff. Security staff complete rounds in these identified areas with minimal security staff supervision include: school, maintenance building, basement, laundry, gym, dayroom, and food services (a, b).</p> <p>During interviews with staff, GCC reported that they had no substantial expansion or modifications have been made to the facility since the last audit (a). No changes have been made to the video monitoring system, electronic surveillance system, or other monitoring technology since the last audit (b).</p> <p>A review of the Gordon Correctional Facility Main Floor Plan, basement floor plan, and school (4/13/05) trailer did not reveal any expansion or upgrades to the facilities technology (a, b).</p> <p>Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.21	Evidence protocol and forensic medical examinations
	<p data-bbox="248 170 898 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="248 248 523 282">Auditor Discussion</p> <p data-bbox="248 327 1473 573">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the DOC shall follow a uniform evidence protocol that maximizes the potential for preserving and or collecting usable physical evidence for administrative proceedings and criminal prosecutions (a, b). When the DOC is not responsible for investigating allegations of sexual abuse, the DOC shall request the the investigating law enforcement agency follow the requirements outlined in policy (a-f).</p> <p data-bbox="248 622 1453 745">During the last 12 months, GCC did not have any sexual abuse allegations or investigations. The facility is responsible for administrative investigations only. Local law enfacement is responsible for all sexual abuse allegations (a).</p> <p data-bbox="248 795 1477 1088">During interviews with ten random staff, staff understood the agency’s protocol for obtaining usable physical evidence if an inmate alleges sexual abuse. GCC staff are at a sergeant level or higher. Sergeant's knew to contact their supervisor, separate the alleged victim from the alleged suspect, secure the crime scene, preserve evidence, advise alleged victim not to brush teeth, take a shower, wash clothes, label and bag evidence. GCC has a PREA evidence protocol, notifications process and procedure for handling evidence and notifying supervisor (a).</p> <p data-bbox="248 1137 1473 1346">During the tour, the auditor was able to observe the sealed PREA evidence kit. The kit contained evidence bags, red tape yellow police tape exam paper, tape gun, sheets and DOC forms. The facility was very organized and had a best practice in collecting evidence. The auditor also observed the PREA evidence locker in the lower basement. The PREA locker is a dedicated space that further preserved the evidence at the facility (a).</p> <p data-bbox="248 1395 1453 1603">All victims shall be offered access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Nurse Examiners (SANE's) where possible. If SANE's cannot be made available, the examination can be performed by other qualified medical practitioners. The facility shall document it's efforts to provide a SANE (c).</p> <p data-bbox="248 1653 1461 2074">During interview with staff, GCC does not conduct forensic medical examinations. However, staff indicated that victims would have timely and unimpeded access to emergency medical treatment. Once the supervisor approves, contact with law enforcement and local hospital would be made to transport the victim and perpetrator separately to SANE nurses at either Cumberland Hospital, Lake view Hospital or Barron County Memorial Hospital ER. forensic sexual assault medical exams are conducted at the primary facility located at Cumberland Memorial Hospital, 1110 7th Ave., Cumberland, WI, 54829 The secondary facility is Lakeview Medical Center, 1100 N Main Street, Rice Lake, WI, 54868 (b). No reports of sexual abuse exams have been conducted in the last 12 months that would confirm the agency’s practice (c).</p> <p data-bbox="248 2123 1393 2157">The facility shall attempt to make available to the victim an advocate from a local sexual</p>

assault service provider to accompany and support the victim through the forensic medical examination process and investigatory interviews. As requested but he victim, such a person shall also provide emotional support, crisis intervention, information and referrals. If a sexual assault service provider is not available to provide victim advocate services, the DOC shall make available a member who has been screened for appropriateness to serve in this role and has received education concerning sexual assault service provider (d, e, h).

GCC has a memorandum of understanding with Center Against Sexual and Domestic Abuse Inc (CASDA). CASDA provides safe and confidential emotional support, accompaniment, crisis intervention, information and referral to victims of sexual abuse in confinement. A review of the agency website <https://casda.org> verified that they do provide the services. The CASDA staff member or volunteer can be reached 24 hours a day, 7 days a week by calling 1-800-649-2921 or (715) 392-3136. via the help line, CASDA provides crisis counseling, emotional support, information, and referrals. This agreement was signed on April 11, 2017. The facility also has a victims services coordinator that has successfully completed 13 hours of PREA victim services coordinator training to provide services to inmates at GCC (e).

GCC is not responsible for investigating allegations of sexual abuse. GCC shall request that the investigating law enforcement agency follow the requirements outlined (f). The local police department is contacted for all allegations of sexual abuse (f). GCC did not have any investigations involving a sexual abuse allegation during the last 12 months (f).

Based on the evidence, the facility is complaint with this standard.

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the DOC shall ensure that an investigation is completed for all allegations of sexual abuse and sexual harassment, including those received from third-parties and anonymous sources. DOC shall maintain a policy(ies) that governs the conduct of such investigation (a, d). Allegations of sexual abuse or sexual harassment that involve potentially criminal behavior shall be referred for investigation to local law enforcement. All referrals to law enforcement shall be documented. The policy describing such referrals, in addition to the investigative responsibilities of the DOC and local law enforcement, shall be published and maintained on the DOC's website (b, c).</p> <p>A review of the agency's website https://doc.wi.gov/Pages/AboutDOC/PrisonRapeEliminationAct.aspx reveals the that the agency does make their policy regarding the referrals of allegations of sexual abuse or sexual harassment for criminal investigation available to the public (b).</p> <p>During the last 12 months, GCC did not have an investigation or allegation of sexual abuse or sexual harassment that could confirm the facilities practice with this provision.</p> <p>During interview with staff, staff indicated that the facility conducts all administrative investigations and refers all criminal investigations to local law enforcement. Staff indicated that there has not been any sexual abuse or sexual harassment investigations at GCC (a-c).</p> <p>Based on the evidence, the facility is in compliance with this standard.</p>

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the DOC shall train all new staff members on the department’s zero-tolerance policy for sexual abuse and sexual harassment. All staff members shall receive training every two years; in years in which a staff member does not receive such refresher training, the DOC shall provide refresher information on current sexual abuse and sexual harassment policies. The training shall include, but is not limited to the subparts listed below. Each staff member shall acknowledge and certify to the DOC, through signature or electronic verification, that they understand the training they received (a). The DOC’s zero tolerance policy for sexual abuse and sexual harassment; how to fulfill staff responsibilities under the DOC sexual abuse and sexual harassment prevention, detection, reporting and response policies and procedures; offenders’ right to be free from sexual abuse and sexual harassment; the right of offenders and employees to be free from retaliation for reporting sexual abuse and sexual harassment; the dynamics of sexual abuse and sexual harassment in confinement; the common reactions of sexual abuse and sexual harassment victims; how to detect and respond to signs of threatened and actual sexual abuse; how to avoid inappropriate relationships with offenders; how to communicate effectively and professionally with offenders, including lesbian, gay, bisexual, transgender, intersex or gender nonconforming offenders; how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities; relevant laws regarding the applicable age of consent; instruction tailored to male and female offenders; and instruction specific to the unique needs and attributes of juveniles. (a). Intranet-based curriculum (a).</p> <p>When new policies/directives regarding sexual abuse and sexual harassment are released all employees who may have contact with inmates are informed via my DOC, PREA PAGE, email or classroom training (c).</p> <p>Staff provided a copy of the agency's PREA page. The PREA page outlines information about sexual assault, PREA standards, how to report sexual abuse or sexual harassment of offenders, what is staff responsibilities as first responders. The Page also details information on how to respond to victims of sexual abuse and sexual harassment (c).</p> <p>Biennial training was last provided in the fall of 2015. Documentation provided for the entire agency as staff members may have transferred from another work location to GCC since their training date in 2015. Documentation of new security staff training (and syllabus). Prior to June 2017, security staff only received classroom PREA instruction. Effective June 2017, in addition to classroom instruction, they are also required to take the online module (going forward, new security staff will appear on the computer generated log (d).</p> <p>A review Wisconsin Correctional Officer PreService Program outlines that corrections officers, correctional sergeants and supervising officers are required to meet training requirements. The program syllabus is 280 hours training curriculum. The computer log shows that staff have completed the required training. Training completion certificates were also reviewed that show that staff have completed the required training for PREA (d). All staff must sign a training</p>

roster that documents the type of training they received, the acknowledgment of the content and requirements of PREA, and the training class record. Training records were reviewed that verified staff did receive required PREA training (a)(b)(c)(d).

During interviews, all staff stated they have received the required training for sexual abuse and sexual harassment in confinement, how to detect, respond to signs of sexual abuse. How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender and intersex, most staff stated that the training consisted of computer based training as well as classroom training (a)(b)(c)(d).

Based on the evidence, the facility has demonstrated compliance with the standard.

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that all volunteers and contractors who have contact with offenders shall be trained, in accordance with the type of service and level of contact they have with offenders, on the DOC's zero-tolerance policy as it related to sexual abuse and sexual harassment. They shall, additionally be trained on their responsibilities under the DOC's sexual abuse and sexual harassment prevention, detection and responses policies and procedures. Each volunteer or contractor shall acknowledge and certify to the DOC, through signature or electronic verification that they understand the training they received. The DOC 2786 PREA Sexual Abuse and Sexual Harassment in confinement training is provided to each contractor that outlines their understanding of the responsibility of training received (a-c).</p> <p>GCC had two contractors and two volunteers that have completed PREA training appropriate for the contact with inmates, all have been trained on the agency's zero tolerance policy, how to report instances of sexual abuse and sexual harassment. All staff must sign a training roster that documents the type of training they received, the acknowledgment of the content and requirements of PREA, and the training class record. Training records were reviewed that verified staff did receive required PREA training (a-c).</p> <p>During interview, staff indicated that contractors and volunteers receive the required training. A review of the DAI volunteer orientation manual outlines that staff and volunteers who learn of any alleged sexual conduct or assault must report it to a supervisor immediately. Additionally, both Federal law and the Department's policies outline the responsibility of volunteers regarding the prevention and intervention of sexual misconduct observed or reported between staff and inmates or volunteers and inmates. This manual outlines the departments Executive Directive 72 ensures compliance with the federal law and clearly established zero tolerance stand regarding sexual contact, sexual assault and sexual harassment of offenders. Volunteers and contractors are provided an additional 27 page training powerpoint, DAI volunteer orientation, and a sexual abuse and sexual harassment in confinement guide for volunteers and contractors. The guide provides the definitions of sexual abuse, sexual harassment, consent, vulnerable offenders and indicators of abuse (a-c).</p> <p>Based on the evidence, the facility has demonstrated compliance with standard.</p>

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that at intake offenders shall receive information detailing the DOC's zero tolerance policy regarding sexual abuse and sexual harassment and how to report such incidents or suspicions (a). Also, within 30 days of intake at adult facilities the facility shall provide a comprehensive education to offenders right to be free of sexual abuse, sexual harassment and disclosure-related retaliation and the DOC's policies and procedures for responding to such incidents (b). Upon transfer to another facility, offenders shall receive education specific to the facility's sexual abuse, sexual harassment and report-related retaliation policies and procedures to the extent they differ from the previous facility (c). Offenders with disabilities or who have limited English proficiency shall have an equal opportunity to participate in or benefit from all aspects of the DOC's efforts to prevent, detect and respond to sexual abuse and sexual harassment. This includes providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary, in addition to the provision of offender education in formats accessible to all. Written materials shall be provided in formats or methods that ensure effective communication with offenders with disabilities (d). Each facility shall maintain documentation of offender participation in these education sessions (e). Each facility shall ensure that key information is continuously and readily available or visible to offenders through poster, handbooks or other written formats (f).</p> <p>At intake inmates receive an red PREA handbook that explains the agency's zero- tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. The PREA handbook also explains the inmates right to be free from sexual abuse and sexual harassment. Within two weeks of arrival inmates attend orientation in the school where they watch a PREA video and receive a PREA orientation handout. The orientation handout tells inmates the how to use the reporting hotline number 777 and how to call outside the agency using reporting hotline number 888. The facility reported that 157 inmates within the last 12 months was given this information at intake (a)(b)(d).</p> <p>Interview with Intake staff (social worker) described the process of orientation at GCC. Staff indicated that the arrival day is Wednesday and they meet with the inmates within 24 hours. Inmates are scheduled orientation within two weeks of arrival. During orientation, sign in on the PREA education offender participation log (DOC2777), watch the PREA video, receive the red PREA handbook, sign their orientation completion sheet. The inmate The PREA handbook is available in Braille and audio format upon request through the PREA office (f).</p> <p>Inmates also have PREA posting throughout GCC in English and Spanish that provides additional information about the agency's zero tolerance policy on sexual abuse and sexual harassment. Additional PREA posters are in medical, library/school, dining hall, dormitory hallways, day room, gym, laundry, staff offices, maintenance and visiting room (a)(b)(d).</p> <p>During the tour, posting were located as indicated throughout the facility in English and Spanish. The posting had the numbers 777 and 888 that inmates could call from the inmate</p>

phone to report internally or externally any allegation of sexual abuse and sexual harassment (a)(b). There were no inmates that were not oriented within 30 days of arrival at intake (c) (d). Interviews with inmates revealed that they did receive PREA orientation guide and a red book at GCC. Inmates stated that they were aware on how to report an allegation of sexual abuse or sexual harassment. They were also aware of the agency's policy on their right to be free from sexual abuse and sexual harassment. A review of ten inmate files confirmed that the inmates do receive orientation within two weeks of arrival and sign an orientation sheet indicating they have received orientation (e).

Based on the evidence, the facility has demonstrated compliance with this standard.

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that staff who investigate incidents of sexual abuse and sexual harassment shall receive specialized training on techniques for interviewing sexual abuse victims, proper use of Miranda, Garrity and Oddsen warnings, sexual abuse evidence collection in confinement settings and the criteria and evidence required to substantiate a case for administrative action or prosecutorial referral. The DOC shall maintain documentation of training completion (a, b, c).</p> <p>The facility does keep documentation of the required training. A review of training records confirmed that staff were trained to conduct PREA investigations consistent with provision (a-c).</p> <p>During interview, staff indicated that they have received the required training. Training was 40 hours for the PREA investigator. Training included techniques for interviewing sexual abuse victims proper use of miranda and Garrity warning, sexual abuse collection in confinement settings and criteria and evidence required to substantiate a case for administrative or prosecution referral (a)(b).</p> <p>During the last 12 months, GCC did not have any sexual abuse or sexual harassment investigations to confirm the agency's practice with this provision (a).</p> <p>Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that all medical and mental health care practitioners who work regularly in a DOC facility(ies) shall be trained on the subparts below. The DOC shall maintain documentation that such training has been received on how to detect and assess signs of sexual abuse and sexual harassment; how to preserve physical evidence of sexual abuse; how to respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment (a).</p> <p>There are two medical staff that regulary work at GCC who received the training required by agency policy (a).</p> <p>During an interview, staff indicated that they received training on how to detect and access signs of sexual abuse and sexual harassment, how to preserve physical evidence of sexual abuse, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and how to report allegations or suspicions of sexual abuse and sexual harassment (a).</p> <p>Interview with medical staff confirmed that they do not conduct forensic examinations at GCC that would confirm the agency's practice with this provision. Any inmate needing a SANE/SAFE examination would be transported to the local hospital at Cumberland Memorial Hospital, 1110 7th Ave., Cumberland, WI, 54829 The secondary facility is Lakeview Medical Center, 1100 N Main Street, Rice Lake, WI, 54868 (b).</p> <p>A review of agency training records indicate that medical staff at GCC has received required training (c-d).</p> <p>Based on the evidence, the facility is in compliance with this standard.</p>

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that offenders shall be assessed during an initial screening within 72 hours of arrival at the facility, and again upon transfer to another facility, for risk of being sexually abused by other offenders or sexually abusive towards other offenders (a-e). The presence of a mental, physical or developmental disability; level of emotional and cognitive development (juveniles facilities only)Age; physical build;Previous incarcerations; exclusively nonviolent criminal history; prior convictions for sex offenses against an adult or child; is, or is perceived to be, gay, lesbian,bisexual, transgender, intersex or gender nonconforming;Previously experienced sexual victimization; prior acts of sexual abuse, prior convictions for violent offenses and/or history of prior institutional violence or sexual abuse; and offender’s perception of vulnerability (d). Offenders may not be disciplined for refusing to answer or for failing to disclose information in regards to the assessment questions (h). In addition to the initial screening, within 30 days of arrival, the facility shall reassess the offender’s risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the initial screening (f). Thereafter, an offender’s risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse or receipt of additional information that bears on the offender’s risk of sexual victimization or abusiveness (g).</p> <p>The facility documented that 163 inmates entered the facility in the last 12 months and was assessed within 72 hours of arrival at intake. Review of 10 risk assessment screening verify that referrals to mental health are offered. Risk assessments for male inmates show staff are screening inmates within 72 hours of arrival to GCC. GCC uses a specific PREA screening tool for male inmates DOC 2781and DOC2781B.The risk screening tools uses screeners observation, age, height, weight, mental health, developmental or physical ability sexual orientation, LGBTI status, convictions of violent offenses, conviction of sexual offense, confinement, conduct for physical assault, victim of unwarranted sexual contact, sexual contact with someone without consent, sexual assault conducted while confined, fears of safety in the facility and sole detained for civil immigration purposes (b)(c)(d)(e).</p> <p>Interviews with staff who perform PREA risk assessments confirm that all factors such as age, physical build, inmates on perception of safety, LGBTI, prior victimization in community or prison, mental illness, convictions of violent or sexual offenses, perpetrator of sexual abuse and misconducts for physical assault are considered. Staff indicate that they get risk screens completed within 72 hours of arrival (a)(c)(d)(e). Interview with staff who perform risk screening stated no inmates are not disciplined for refusing to answer the risk assessment screen questions (h).</p> <p>The auditor reviewed 10 inmate files for risk screening and confirmed that the agency is screening inmates for risk of victimization and risk of abusiveness within 72 hours of arrival at the facility.</p> <p>The agency implemented an automated system on October 22, 2017 for risk assessment and 30 -day reassessments. Therefore, the auditor was provided 30 day reassessments for review</p>

on November 21, 2017. In review of two assessments dated 10/25/17 and 30 day reassessments on 11/16/17, GCC did assess and reassess inmates risk of victimization and risk of abusiveness that would confirm the agency's practice with this provision (f). All of the risk screening documents are stored in the inmates confidential section of his DOC file which keeps sensitive information from being exploited. Only administration and medical and social workers have access to the inmates file (i).

During the last 12 months, GCC did not have a reported incident of sexual abuse or sexual harassment, referral or request to reassess an inmates risk level that would confirm the agency's practice with this provision (g).

Based on the evidence, the facility is in compliance with this standard.

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that information obtained from the initial or follow-up screening shall inform housing, bed, work, education and program assignments with the goal of keeping separate those offenders at high risk of being sexually victimized from those at high risk of being sexually abusive. For the purposes of education, programming, work, and recreation activities, line-of-sight monitoring by DOC staff is sufficient to maintain separation (a). Individualized placement determinations shall be made for each offender (b).</p> <p>Staff utilize the risk assessments in determining proper placement for housing and work assignments. During the tour the auditor was able to review 10 PREA risk assessments for victimization (ROV) and risk of abusiveness (ROA). Post audit the auditor was able to review two risk assessments from the new automated system for tracking ROA and ROV. The tracking system show how inmates are assessed and reassessed, housed and tracked so not to have incompatible PREA risk assessment score when placed in the same dormitory or work release program. The risk assessments provide a list of screening questions that determine a inmates risk of abusiveness and a risk of victimization. Having this screening tool helps staff identify the appropriate placement for each inmate. The risk screening tools are secured in the social workers office file to keep inmate information confidential (a)(b).</p> <p>During interview with staff, they ensure the prisoner are not housed in the same dormitory if their risk screens are not compatible. They also ensure that the inmates placement on the work release program is compatible. Control center staff indicated that they receive a list of prisoner that would need supervisory approval for bed and room changes. The list is updated and maintained by facility administration (a, b).</p> <p>During the onsite visit, the facility stated there were no LGBTI inmates at GCC to confirm the facilities practice with provision (c, d, e, f, g).</p> <p>Interviews with 12 random inmates confirmed that they were asked a series of questions upon intake. Some inmates could remember the questions asked and other stated that they were asked the same questions at their previous facility.</p> <p>Based on the evidence, the facility is in compliance with this standard.</p>

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that offenders at high risk for sexual victimization shall not be separated from the general population unless an assessment of all available alternatives has been made and a determination has been made that there is no available alternative means of separation from likely abusers. If an assessment cannot be conducted immediately, the facility may separate the offender involuntarily from the general population for less than 24 hours while completing the assessment (a).</p> <p>During the last 12 months, GCC did not have an incident of sexual abuse or sexual harassment during the audit period that would confirm the facilities practice with this provision (a, b, c, d, e,). A review of prisoner placed in temporary lock up at the county jail confirmed that there was no inmate placed for an allegation of sexual abuse.</p> <p>Interview with staff, staff stated that the facility does not have a segregated housing at GCC.</p> <p>Based on the evidence, the facility is in compliance with this standard.</p>

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines the DOC shall provide multiple ways for offenders to privately report sexual abuse and sexual harassment, retaliation by other offenders or employees for reporting sexual abuse and sexual harassment, and employee neglect or violation of responsibilities that may have contributed to such incidents. In addition, the DOC shall provide at least one way for offenders to report sexual abuse and sexual harassment to a public or private entity that is not part of the DOC (a, b). Employees shall accept reports made verbally, in writing, anonymously, and from third parties; promptly document any verbal reports and immediately report to supervisory staff (c). The DOC shall provide a method for employees to privately report sexual abuse and sexual harassment of offenders (d).</p> <p>During interviews with staff, staff confirmed that inmates do have multiple ways of reporting sexual abuse or sexual harassment. One way of reporting is inmates can call the 777 for central office in Madison Wisconsin or 888 that would go through the local police department. Also, inmates can use the inmate grievance system. Which is an internal mailbox that inmates can complete an interview request. Inmates can kite the PREA Compliance Manager directly or report an allegation to any staff member. Staff also stated they would report an allegation directly to their supervisor and document it in writing.</p> <p>During the last 12 months, there was no reported allegation of sexual abuse or sexual harassment at GCC.</p> <p>The PREA handbook for inmates provides information about reporting sexual abuse allegations to staff member. Each inmate is issued a PREA handbook at intake. If staff receive an allegation of sexual abuse or sexual harassment they report it immediately to their supervisor (a)(b)(c)(d).</p> <p>During the tour, there were PREA posting in every housing unit that list the local hotline number 777 and the outside hotline number 888 in English and Spanish. The PREA auditor notification signs was posted in every housing unit including other areas that prisoners have access in English and Spanish (a)(d).</p> <p>During interviews with 12 inmates, inmates reported that they knew how to report an allegation of sexual abuse or sexual harassment. All 12 inmates knew that they could call the PREA hotline number they could call anonymously by dialing 777 or 888, you could write a letter, ask to speak to security staff, call home and report it to family (a)(b)(c)(d).</p> <p>Based on the evidence, the facility is in compliance with this standard.</p>

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that all sexual abuse and sexual harassment complaints filed through the Inmate Complaint Review System shall be immediately redirected and referred for sexual abuse and/or sexual harassment investigation. See Investigations (section XVII.) for guidelines. Inmates shall be notified within 30 days of the initial complaint that an investigation into the portion of the complaint alleging sexual abuse or sexual harassment has commenced and the Inmate Complaint Review process has concluded. A time limit shall not be imposed on when an offender may submit a complaint regarding an allegation of sexual abuse or sexual harassment though other applicable time limits may still apply to any portion of the complaint that does not allege an incident of sexual abuse or sexual harassment. All appeals shall be made in accordance with Wisconsin State statutory time limits and referred to the appropriate reviewing authority. The complaint process shall not include a mandatory informal resolution requirement (a,b, d). Each facility shall ensure that an offender who alleges sexual abuse or sexual harassment may submit a complaint without submitting it to an employee who is the subject of the complaint and that such a complaint is not referred to an employee who is the subject of the complaint. The offender may use an alternate method of filing (c). Third parties, including fellow offenders, employees, family members, attorneys and outside advocates, shall be permitted to assist an offender in filing complaints related to allegations of sexual abuse or sexual harassment. Complaints filed shall be referred for sexual abuse and/or sexual harassment investigation (e). If an offender alleges that he or she is subject to a substantial risk of imminent sexual abuse, the offender may contact any employee who is not the subject of the allegation. Staff shall immediately forward the allegation to facility leadership for immediate corrective action. Facility leadership shall provide an initial response within 48 hours and issue a final decision within 5 calendar days. The initial response and final facility decision shall document the facility's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency complaint. Further response shall be in accordance with Employee Reporting (f). The DOC may discipline an offender for a complaint filed alleging sexual abuse or sexual harassment only where the DOC demonstrates that the complaint was filed in bad faith (g).</p> <p>During the tour, all areas that inmates had access displayed PREA posters in both English and Spanish that show multiple ways in which an inmate can report an allegation of sexual abuse and sexual harassment. One way of reporting is through the Inmate Complaint Review System (ICRS). The inmate complaint review system provides a process by which inmates may raise grievances concerning rules, living conditions, and staff actions. Sexual abuse and sexual harassment complaints filed through the ICRS shall be immediately redirected and referred for investigation (a).</p> <p>During interviews with staff, staff stated they would report any allegation of sexual abuse or sexual harassment to their supervisor. During the last 12 months, GCC did not have any reported allegations of sexual abuse or sexual harassment to confirm the facilities practice with this standard. Interviews with inmates revealed that the inmates knew of the various ways of reporting including using the Inmate complaint system. Inmates knew that they could report</p>

to a family member or friend.

Based on the evidence, the facility is in compliance with this standard.

115.53	Inmate access to outside confidential support services
	<p data-bbox="248 168 898 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="248 248 523 284">Auditor Discussion</p> <p data-bbox="248 329 1469 701">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the facility shall provide offenders with access to outside victim advocates, with whom the DOC shall maintain or attempt to enter into memoranda of understanding with, for emotional support services related to sexual abuse. Access includes giving offenders mailing addresses and telephone numbers, including toll-free hotline numbers where available. The facility shall enable reasonable communication between offenders and these organizations and agencies, in as confidential a manner as possible and, in advance, provide notification to offenders of the extent to which such conversations will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws (a, b, c).</p> <p data-bbox="248 757 1469 1043">During the tour, sexual abuse and sexual harassment posting in the hallways outside of the dormitory rooms, gym, school/library, dayroom, food service basement and other areas in the facility provide inmates access to the PREA reporting hotline phone numbers 777 for making calls inside DOC locations and hotline phone number 888 for calls outside DOC. The hotline number does not require inmates to utilize their pin number which provides a way inmates can communicate in a confidential manner. This information is also available in the inmate handbook that inmates receive at intake and again during inmate orientation (a)(b).</p> <p data-bbox="248 1099 1469 1261">Interviews with staff and inmates indicate that inmates know how to report an incident of sexual abuse and sexual harassment. Staff in intake provide the red Sexual Abuse and Sexual Harassment Prevention and Intervention handbook. Inmates knew the reporting phone numbers 777 and 888 for making a sexual abuse or sexual harassment complaints (a)(b).</p> <p data-bbox="248 1317 1469 1644">The Wisconsin Department of Corrections (DOC) has an Memorandum of Understanding (MOU) with Center against Sexual and Domestic Abuse inc (CASDA). The purpose of this MOU is for DOC and CASDA to comply with Prison Rape Elimination Act (PREA). CASDA is a sexual assault provider (SARP) that assure coordinated, safe and confidential emotional support, accompaniment, crisis intervention information and referral to victims of sexual abuse in confinement as required by the Prison Rape Elimination Act (PREA). The MOU provides an outline of the role and responsibilities of DOC and SARP which shall enhance commitment to providing advocacy services to victims of sexual abuse in confinement.</p> <p data-bbox="248 1700 1469 1901">During the Pre-audit, the facility provided the auditor with a copy of the memorandum that outlines the agreement between Wisconsin Department of Corrections and Center Against Sexual and Domestic Abuse Inc. dated April 2017. The auditor was able to view CASDA website https://casda.org/contact/ to confirm that CASDA does provide crisis counseling, emotional support, information, and referrals.</p> <p data-bbox="248 1957 1469 2074">During interview with staff, the facility also has a victim services coordinator and social workers that are also available to assist any inmate with counseling, therapy and intervention services. Staff confirmed that the CASDA agency is also available to inmates at 1-800-649-292.</p> <p data-bbox="248 2130 1158 2166">Based on the evidence, the facility is in compliance with this standard.</p>

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that employees shall accept reports made verbally, in writing, anonymously, and from third parties; promptly document any verbal reports and immediately report (a).</p> <p>The facility has information posted in areas throughout the facility. Also the facility has PREA signs posted in the visiting room in view of the public for reporting sexual abuse and sexual harassment (a). The information for the public is also available on the agency's website.</p> <p>During the random inmate interviews, inmates expressed knowing how to report a sexual abuse or sexual harassment allegation with someone other than the facility staff. Inmates stated they could report to family or call the 888 phone number (a).</p> <p>During interview with staff, GCC has not had any reported incidents of sexual abuse or sexual harassment during the last 12 months that would confirm the facility's practice with this provision.</p> <p>Based on the evidence, the facility is in compliance with this standard.</p>

115.61	Staff and agency reporting duties
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1481 1003">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that employees shall accept reports made verbally, in writing, anonymously, and from third parties; promptly document any verbal reports and immediately report any knowledge, suspicion or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the DOC; any incidents of retaliation against offenders or employees who reported such an incident; and/or any employee neglect or violation of responsibilities that may have contributed to an incident or retaliation (a). Employees shall not reveal any information related to sexual abuse or sexual harassment to anyone other than to supervisors, investigators and designated officials. Such information shall be limited to information necessary to make treatment, investigation and other security and management decisions (b). Medical and mental health practitioners duty to report, and limitations of confidentiality at the initiation of services (c). If the alleged victim is under the age of 18 or considered a vulnerable adult in accordance with State or local statute, the DOC shall report the allegation to the designated State or local services agency under mandatory reporting laws (d). All allegations of sexual abuse and sexual harassment including third party and anonymous reports shall be reported (e).</p> <p data-bbox="252 1055 1481 1391">During interviews with staff, staff reported that they knew how to report an allegation of sexual abuse and sexual harassment. Staff knew the agency zero tolerance policy, confidentiality of reporting and that sexual abuse and sexual harassment allegations had to be reported immediately. Also, the facility staff stated they would report the allegation to their supervisor and contact the local law enforcement agency in the county. (a, b). Medical staff also knew of their duty to report an allegation of sexual abuse and sexual harassment and the limitations of confidentiality (c). Dependent on the method of reporting, the facility usually have a team of investigators (e).</p> <p data-bbox="252 1442 1481 1644">The Sexual Abuse and Sexual harassment Prevention and Intervention handbook provided inmates information on reporting sexual abuse and sexual harassment complaints to staff and confidentiality of those reports (a)(b). The facility reported that they have not had any sexual abuse or sexual harassment administrative or criminal investigations during the last 12 months that would confirm the agency's compliance with this provision (a, b, c, e).</p> <p data-bbox="252 1695 1481 1897">The Sexual Abuse and Sexual harassment Prevention and Intervention handbook provided inmates explains the staff duty to report to the appropriate protection agency for anyone under the age of 18 and a similar report may also be made if the victim is an older adult 60 years or older or an at risk adult (d). GCC does not house inmates under the age of 18. Therefore, the auditor could not confirm the agency's practice with this part of provision (d).</p> <p data-bbox="252 1948 1158 1982">Based on the evidence, the facility is in compliance with this standard.</p>

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that When the department or facility learns that an offender is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the offender (a).</p> <p>In the past 12 months, GCC has not had an inmate that was subject to a substantial risk of imminent sexual abuse (a). The facility reported that they have not had any sexual abuse or sexual harassment administrative or criminal investigations during the last 12 months to confirm the agency's practice with this provision.</p> <p>An interview with staff, staff would immediately take action by keeping the victim and suspect separated, call a supervisor, encourage them not to shower, bring inmate into a safe neutral area, removed from facility to temporary lock up (a). Staff indicated they would use of the risk of victimization and risk of abusiveness PREA screening. Screening would be reviewed to make sure the victim is not placed with the perpetrator on any potential job placement including level of supervision. We would investigate immediately, interview inmates and review camera.</p> <p>Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that within 72 hours of receiving an allegation that an offender was the victim of sexual abuse while confined at another facility, the information shall be reported to the head of the facility where the alleged abuse occurred (a, b). All notifications shall be documented and the appointing authority that receives such notification shall ensure that the allegation is investigated (c, d).</p> <p>In the past 12 months, GCC did not have any allegations of sexual abuse or sexual harassment to confirm the facilities practice with this provision (a, b, c, d). During staff interviews, staff stated that if they did they would report to CPS and local law enforcement in the county. Investigation would start at the facility for possible SANE examination, monitoring risk assessment scores for the victim and suspect, and contacting mental health counseling at Stanley correctional via Polycom. Facility staff confirmed that the Warden would be notified.</p> <p>Based on the evidence, the facility is in compliance with this standard.</p>

115.64	Staff first responder duties
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1477 913">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that Upon learning of an allegation that an offender was sexually abused, the first security staff member to respond to the report shall be required to, at a minimum 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; and 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 (a). If the first 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 (b).</p> <p data-bbox="252 969 1477 1126">During the last 12 months, there was no reported allegation of sexual abuse to which security staff member was able to protect the crime scene or request the alleged victim to take actions not to destroy physical evidence the would confirm the agency’s practice with this provision (a, b).</p> <p data-bbox="252 1182 1461 1301">During staff interviews, both security staff and non security first responders knew what action to take if there was an allegation of sexual abuse. Security staff knew how to preserve the scene and collect evidence (a, b).</p> <p data-bbox="252 1357 1477 1603">During the tour, GCC staff provided auditor access to the PREA kit. The facility has two PREA kit that are tagged and sealed. Each kit has all of the necessary items in preserving evidence at a crime scene. The facility also has a PREA contraband locker. This provided the auditor insight on how well the facility is prepared to respond to an allegation of sexual abuse and the steps to preserve physical evidence. Staff also described how they would use each item in the PREA kit.</p> <p data-bbox="252 1659 1158 1693">Based on the evidence, the facility is in compliance with this standard.</p>

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that each facility shall develop a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among employee first responders, medical and mental health practitioners, investigators and facility leadership. (a).</p> <p>During an interview with staff, staff stated that the facility does have a written plan at GCC to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators and facility leadership (a).</p> <p>The auditor was able to review the facility's PREA notification plan. The plan details the contact information for the Superintendent, Captain, local law enforcement, SANE staff at the local hospital. The plan details procedures for first responders, victim and perpetrator waiting area before transport to hospital ER, and PREA kit evidence procedure (a).</p> <p>Based on the evidence, the facility is in compliance with this standard.</p>

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The State of Wisconsin has not entered into any Collective Bargaining agreements in the last 12 months to assess the agency's compliance with this provision.</p> <p>In an interview with the agency's head designee, GCC is not under a collective bargaining agreement.</p> <p>Based on the evidence, the facility is in compliance with this standard.</p>

115.67	Agency protection against retaliation
	<p data-bbox="252 168 901 201">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 246 523 280">Auditor Discussion</p> <p data-bbox="252 324 1484 795">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that each facility shall designate an employee(s) to monitor retaliation to ensure that all offenders and employees involved in the reporting or investigation of sexual abuse and/or sexual harassment are protected (a). For at least 90 days following a report of sexual abuse, the designated facility-based employee(s) shall monitor the conduct and treatment of the offender(s) or employee(s) who reported the sexual abuse and the offender(s) who were reported to have experienced sexual abuse to determine if retaliation occurred. For offenders, such monitoring shall include periodic status checks. Employees shall act promptly to remedy any such retaliation. Monitoring beyond 90 days shall continue if the initial monitoring indicates a continuing need (c, d). For offenders or employees who express fear of retaliation, the facility shall take appropriate protective measures (b, e).</p> <p data-bbox="252 840 1484 996">During the last 12 months, the facility did not have any allegations of sexual abuse that could confirm the facility's practice with this provision (a, b, c, d). During an interview with staff, staff indicated that they do deploy different measures to protect staff and inmate from retaliation (b, e).</p> <p data-bbox="252 1052 1444 1176">The facility provided DOC 2805 Sexual Abuse Allegation staff retaliation monitoring, DOC 2767 Sexual Abuse and Sexual Harassment Victim services coordinator response checklist that would document monitoring with victim and the staff member for 90 days.</p> <p data-bbox="252 1220 1157 1254">Based on the evidence, the facility is in compliance with this standard.</p>

115.68	Post-allegation protective custody
	<p data-bbox="252 1460 901 1494">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 1538 523 1572">Auditor Discussion</p> <p data-bbox="252 1617 1484 1740">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that any use of restricted status housing to protect an offender who is alleged to have suffered sexual abuse shall be subject to the requirements of placement 115.43 (a).</p> <p data-bbox="252 1785 1484 1953">During the last 12 months GCC did not any sexual abuse allegation or have an inmate who alleged to have suffered sexual abuse who were held in involuntary segregated housing awaiting completion of assessment that would confirm the agency's practice with this provision (a).</p> <p data-bbox="252 2042 1157 2076">Based on the evidence, the facility is in compliance with this standard.</p>

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the DOC shall ensure that an investigation is completed for all allegations of sexual abuse and sexual harassment, including those received from third-parties and anonymous sources. DOC shall maintain a policies that governs the conduct of such investigation (a). Allegations of sexual abuse or sexual harassment that involve potentially criminal behavior shall be referred for investigation to local law enforcement. All referrals to law enforcement shall be documented. The policy describing such referrals, in addition to the investigative responsibilities of the DOC and local law enforcement, shall be published and maintained on the DOC's website (h). Investigators shall preserve and/or collect direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator(c). The credibility of an alleged victim, suspect or witness shall be assessed on an individual basis and shall not be determined by the person's status as offender or employee. The DOC shall not require an offender who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation (e). Administrative investigations shall include an effort to determine whether employee actions or failures to act contributed to the abuse (f). Administrative and criminal investigations shall be documented in a written report to be retained for as long as the alleged abuser is incarcerated or employed by the DOC, plus ten years. Administrative investigative reports shall include a description of the physical and testimonial evidence, the reasoning behind credibility assessments and the investigative facts and findings (f,i). The departure of an alleged abuser or victim from the employment or control of the facility or the DOC, or the recantation of the allegation, shall not provide a basis for terminating an investigation (j).</p> <p>The agency is not responsible for conducting criminal sexual abuse allegations. However, the agency does conduct administrative sexual abuse allegations which is documented on a DOC 1271 report. The Criminal sexual abuse allegations are referred to the local law enforcement for investigation in Douglas County. Both agencies have a good working relationship (a). A review of training records confirmed that staff were trained to conduct PREA investigations consistent with provision (b).</p> <p>Investigative staff were interviewed and confirmed that they receive 40 hours of specialized training to conduct sexual abuse investigations. Staff was able to describe the training they received and the referral process for criminal investigations. Staff confirmed that staff knew the investigative process of reporting to supervisor, security director and law enforcement. Staff indicated that all investigations are documented in written reports (a, b,c). When the quality of evidence appears to support criminal prosecution, the agency would consult with prosecutors before conducting compelled interviews (d).</p> <p>The facility reported that they have not had any sexual abuse or sexual harassment administrative or criminal investigations during the last 12 months that would confirm the</p>

agency's compliance with this provision (e, f, g, h, l, j).

Based on the evidence, the facility has demonstrated compliance with the standard.

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the DOC shall impose no standard higher than a preponderance of the evidence in determining whether the allegations of sexual abuse or sexual harassment are substantiated (a).</p> <p>The facility reported that they have not had any sexual abuse or sexual harassment administrative or criminal investigations during the last 12 months that would confirm the agency's compliance with this provision (a).</p> <p>GCC has one investigative staff. During an interview with investigative staff, staff stated that the standard of evidence they require to substantiate allegations of sexual abuse or sexual harassment is more likely than not the preponderance of the evidence .</p> <p>Based on the evidence, the facility has demonstrated compliance with the standard.</p>

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	<p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1471 618">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that following an investigation of an allegation that an offender suffered sexual abuse in a DOC facility, the facility shall inform the alleged victim, and document such notification, as to whether the allegation has been determined to be substantiated, unsubstantiated or unfounded. If the DOC did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the alleged victim. The DOC's obligation to report shall terminate if the alleged victim is released from custody (a, b, e, f).</p> <p data-bbox="252 669 1401 786">The facility reported that they have not had any sexual abuse or sexual harassment administrative or criminal investigations during the last 12 months that would confirm the agency's compliance with this provision.</p> <p data-bbox="252 837 1471 913">A review of agency letters DOC 2768 confirm that the agency has a process for notification of findings for substantiated, unsubstantiated, and unfounded cases.</p> <p data-bbox="252 965 1471 1041">During interviews with 12 inmates, no inmate reported that they had knowledge of or reported a sexual abuse or sexual harassment allegation.</p> <p data-bbox="252 1093 1337 1126">Based on the evidence, the facility has demonstrated compliance with the standard.</p>

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines staff members who are found to have violated the DOC sexual abuse, sexual harassment and retaliation policies shall be subject to disciplinary sanctions up to and including termination (a). Termination is the presumptive sanction for a staff member who engaged in sexual abuse. All terminations for violations of the DOC sexual abuse and sexual harassment policies, including resignations that would have resulted in termination if not for the resignation, shall be reported to any relevant licensing bodies (b)(d). Sanctions shall be commensurate with the nature and circumstances of the violation, the staff member's disciplinary history and the sanctions imposed for comparable offenses by other staff with similar histories (c).</p> <p>Interview with agency and facility staff revealed that there was no sexual abuse or sexual harassment investigations during the last 12 months to confirm the agency practice with this provision (b). There were no disciplinary sanctions for violation of the agencies policy relating to sexual abuse or sexual harassment by staff during the audit period to confirm the agencies practice (c). There were no termination for violation of the agency sexual abuse or sexual harassment policy during the audit period to confirm the agencies practice (d).</p> <p>Interviews with 12 inmates confirmed that they were not aware of any incident of sexual abuse or sexual harassment within the last 12 months.</p> <p>Based on the evidence, the facility has demonstrated compliance with the standard.</p>

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) confirms that any volunteer or contractor who engages in sexual abuse shall be prohibited from contact with offenders and shall be reported to relevant licensing bodies. Appropriate remedial measures shall be taken by the facility to ensure the safety of offenders in contact with volunteers and contractors (a,b).</p> <p>During the last 12 months one investigation was reviewed that verified there had not been any instance of sexual abuse or sexual harassment by a contractor or volunteer (a). During the last 12 months, GCC has not had a volunteer or contractor that violated the agency's policy on sexual abuse and sexual harassment to take appropriate measures and consider whether to prohibit further contact with inmates that would confirm the agency's practice (b).</p> <p>During interview with staff, staff confirmed that the agency had not had an instance where a contractor or volunteer violated the agency's sexual abuse or sexual harassment policy (b). The agency refers all investigations to local law enforcement in and there was no instance where a contractor or volunteer had to be reported to law enforcement (a).</p> <p>Based on the evidence, the facility has demonstrated compliance with the standard.</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that Offenders who have committed offender-on-offender sexual abuse are subject to disciplinary sanctions pursuant to a formal disciplinary process (a). Sanctions shall be commensurate with the nature and circumstances of the violation, the offender’s disciplinary history and the sanctions imposed for comparable offenses by other offenders with similar histories (b). The disciplinary process shall consider whether a perpetrating offender’s mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed (c). The facility shall consider requiring perpetrating offenders to participate in interventions, such as therapy or counseling, to address and correct underlying reasons or motivations for the abuse (d). An offender may only be disciplined for sexual contact with an employee upon a finding that the employee did not consent to such contact (e). Reports of sexual abuse or sexual harassment 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 to substantiate the allegation (f). While consensual sexual activity between offenders is prohibited in the DOC facilities, the DOC may not deem consensual sexual activities as sexual abuse if it is determined that the activity is not coerced (g).</p> <p>GCC did not have any administrative findings of inmate-on-inmate sexual abuse that have occurred at the facility. GCC did not have any administrative finding that resulted in criminal finding of guilt to confirm the agency’s practice with this provision (a).</p> <p>Interviews with staff confirm that the facility did not have any instances of inmate and inmate sexual abuse. However, disciplinary actions for inmates that commit inmate on inmate sexual abuse are subject to disciplinary sanctions (b). The disciplinary process would consider an inmates mental illness in determining sanctions (c). The agency does offer therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse to the offending inmate if he remained in the program. (d). Although the agency prohibits sexual activity between offenders, non-coercive sexual activity between inmates is not considered sexual abuse (g). Also, an inmate may be disciplined for sexual contact with an employee upon a finding that an employee did not consent to the sexual contact with the inmate (e). There had been no instance of an inmate sexual contact on an employee to confirm the agency's practice with this provision (e).</p> <p>Based on the evidence, the facility has demonstrated compliance with the standard</p>

115.81	Medical and mental health screenings; history of sexual abuse
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1481 875">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that if either the initial or follow-up screening indicates an offender has previously experienced prior sexual victimization or has perpetrated sexual abuse, whether it occurred in an institutional setting or in a community setting, employees shall ensure the offender is offered a follow-up meeting with a mental health provider within 14 days of the initial or follow-up screening (a,b,c). Further, any information related to sexual victimization or abusiveness occurring in an institutional setting shall be confidential and strictly limited to medical and mental health clinicians and other employees, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education and program assignments or as otherwise required by law (d). Also, medical and mental health practitioners shall obtain informed consent from offenders before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the offender is under the age of 18 (e).</p> <p data-bbox="252 927 1469 1263">During the onsite audit, the auditor reviewed 10 adult male screening reviews that was completed within 72 hours of arrival. If prior victimization was reported during screening, medical follow up is offered (a). If prior perpetrated sexual abuse has occurred, mental health follow services are offered (b). If a jail inmate has experienced prior sexual victimization, they are offered a follow up with medical staff. GCC staff conduct all PREA risk screening. Therefore, information related to sexual victimization or abusiveness is strictly limited to medical health practitioners and other staff as necessary for treatment plans and security management decisions regarding placement, assignments and education (d).</p> <p data-bbox="252 1314 1474 1561">During interview with staff it was confirmed that inmates are offered a follow-up screening with medical staff. A review of ten follow up screening indicates that follow up with medical staff is being offered. GCC does not have youthful offenders (e). However, medical staff indicated that they do receive informed consent from inmates for incidents that occurred in the community before reporting sexual victimization that did not occur in the institutional setting (e).</p> <p data-bbox="252 1612 1342 1646">Based on the evidence, the facility has demonstrated compliance with the standard.</p>

115.82	Access to emergency medical and mental health services
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1485 528">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that all medical and mental health treatment services shall be provided to the victim without financial cost, regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident, and in a manner consistent with the community level of care (c)(d).</p> <p data-bbox="252 584 1485 831">GCC would use a DOC -3001 Off site service request and report if a inmate was to go off site for treatment. GCC staff reported that there was no incident of a sexual abuse allegation in the last 12 months. However, staff indicated if there was they would notify their immediate supervisor and take necessary steps to protect the victim by separating the victim from perpetrator including preserving evidence. With their supervisors approval they would contact the SANE nurse (a)(b).</p> <p data-bbox="252 887 1477 1088">During interview, staff indicated that victims would have timely and unimpeded access to emergency medical treatment. Once the supervisor approves, contact with law enforcement and local hospital would be made to transport the victim and perpetrator separately to SANE nurses at either Cumberland Hospital, Lake view Hospital or Barron County Memorial Hospital ER (c).</p> <p data-bbox="252 1144 1342 1178">Based on the evidence, the facility has demonstrated compliance with the standard.</p>

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines the facility shall offer medical and mental health evaluation and, as appropriate, treatment to all offenders who have been victimized by sexual abuse in any confinement setting. The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities or their release from custody (a,b). All medical and mental health treatment services shall be provided to the victim without financial cost, regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident, and in a manner consistent with the community level of care (g)(c). Victims of sexual abuse shall be offered tests for sexually transmitted infections (f). Facilities shall attempt to conduct a mental health evaluation of all known offender-on offender abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners (h).</p> <p>GCC is an all male facility. Therefore, provision (d) and (e) does not apply.</p> <p>GCC staff reported that there has not been an incident of sexual abuse in the last 12 months to evaluate the facility compliance with this standard. However, staff indicated what actions they would take in the event an inmate alleged to have been sexually abused at GCC. Staff indicated they would separate the victim from the perpetrator, contact their immediate supervisor and take necessary precautions to preserve evidence. Staff would encourage the victim not to take a shower change cloths, brush teeth, eat, drink until they have been evaluated at the local hospital.</p> <p>A review of 10 PREA risk screening assessments indicate that staff are conducting PREA intake assessments and make referrals immediately.</p> <p>Based on the evidence, the facility has demonstrated compliance with the standard.</p>

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The agency's Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) Policy outlines that all facilities shall conduct a review within 30 days of the conclusion of every sexual abuse investigation unless the allegation was determined to be unfounded. The team shall consist of upper level management officials with input from supervisors, investigators and medical and mental health practitioners (a)(b)(c). Agency's policy also 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; 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 employees; and prepare a report of its findings, including but not necessarily limited to determinations made in the above items, and any recommendations for improvement and submit such report to the facility head and PREA Compliance Manager (d). Also, the agency policy outlines that the facility shall implement the recommendations for improvement, or shall document its reasons for not doing so (e).</p> <p>During an interview with staff, staff revealed that there had not been a reported incident or an allegation of sexual abuse that the agency would have investigated that would render a sexual abuse indecent review. However, staff indicated that if they did have an sexual abuse incident they would follow the agency policy (a)(b)(c)(d)(e).</p> <p>During interviews with random inmate and during the tours, none of the inmate stated that they reported or know of a sexual abuse allegation during the last twelve months.</p> <p>Based on the evidence, the facility is compliant with this standard.</p>

115.87	Data collection
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1469 703">Agency Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) policy outlines that the DOC shall collect accurate, uniform data from incident-based documents such as reports, investigation files and sexual abuse incident reviews for every allegation of sexual abuse within facilities, including facilities with which it contracts for the confinement of offenders, using a standardized instrument and set of definitions. The extracted data, at minimum, shall include the information to answer all questions from the most recent version of the Department of Justice Survey of Sexual Victimization. This data shall be aggregated annually, reported to the Department of Justice as requested and, with personal identifiers removed, posted publicly to the DOC's website annually (a)(b)(c)(c)(e)(f).</p> <p data-bbox="252 757 1437 916">A review of the agency website reveal that the the Wisconsin Department of Corrections collects and aggregates incident-based sexual abuse data. After analyzing such data, DOC posts an annual compilation of findings and corrective actions on its website. The agency currently post 2010, 2011, 2012, 2013, 2014, and 2015 on its website.</p> <p data-bbox="252 969 1410 1088">An interview with the agency's PREA Coordinator revealed that the agency does a layer approach. The agency collects the data, incident reviews and compile after that year. We identify problem areas and it is reflected in that report.</p> <p data-bbox="252 1142 1342 1176">Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Agency Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the agency shall collect accurate, uniform data from incident-based documents such as reports, investigation files and sexual abuse incident reviews for every allegation of sexual abuse within facilities, including facilities with which it contracts for the confinement of offenders, using a standardized instrument and set of definitions. The extracted data, at minimum, shall include the information to answer all questions from the most recent version of the Department of Justice Survey of Sexual Victimization. This data shall be aggregated annually, reported to the Department of Justice as requested and, with personal identifiers removed, posted publicly to the DOC's website annually (a,b,c,d).</p> <p>During an interview with staff, after every incident the agency does an after action on it. The incident review team (Investigators, health team, victim services coordinator) will review sexual abuse substantiated or unsubstantiated incidents and look at all factors. The agency looks at the policy, camera placement, staffing levels, and physical plant modifications in the area. This data is compiled by the PREA office (a). The agency prepares an annual report of findings from its data review and any corrective actions for each facility as well as the agency(b). The Secretary Office approves the annual reports and the reports made available to the public on the agency's website (c). The agency reported that they do not redact information from the annual report (d).</p> <p>A review of the agency's website revealed that the Wisconsin Department of Corrections does collect and aggregate incident-based sexual abuse data. After analyzing the data the agency does post an annual compilation of findings and corrective actions on the agency's website (alb,c,d)</p> <p>Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Agency Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that All data shall be securely retained and maintained for at least 10 years after the date of initial collection (a,d). This data shall be aggregated annually, reported to the Department of Justice as requested and, with personal identifiers removed, posted publicly to the DOC's website annually (b,c).</p> <p>Interview with staff revealed that the personal identifiers are not disclosed. The agency stated that they do not talk about specific incidents. When they collect data it is subject/victim. Therefore, there is nothing to keep confidential.</p> <p>A review of the agency website, Prisoner Rape Elimination Act (PREA annual reports for 2014 and 2015 did not reveal any personal identifiers. The agency did not use names, inmate numbers that would disclose the victim or suspects identity. The reports from 2010, 2011, 2012, 2013, 2014, 2015 are available for the public to review.</p> <p>Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>In review of the agency website, the agency list all Prison Rape Elimination Act (PREA) audits for each of the facilities that is operates. All facilities were audited at least once (a)(b).The facility PCM did provide the auditor full access to all areas within the facility (h). The auditor received documentation pre-audit and was able to request additional documents onsite and post audit. At the exit meeting during the onsite audit, the auditor made recommendations and the facility acknowledged the recommendations and provided the documentation to support the action taken by the facility (i).The auditor was able to conduct private interviews with 12 inmates during the on site audit (m). The auditor sent the audit notice to post throughout the facility on July 5, 2017. The facility verified that the notice was posted on July 5, 2017 and during the onsite tour the auditor observed the auditors notice in every area that inmates had access. The auditors notice provided inmates the ability to send correspondence to the auditor in the same manner as if they were communicating with legal counsel. The auditor did not receive correspondence from any inmate at Gordon Correctional Center pre-audit or post audit. However, during interviews inmates verified that they knew of the auditors notice and knew that they could write the auditor (m)(n).</p> <p>Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	In review of the agency website, the agency has published on the agency website all the final reports for each facility within 90 days of being issued by the auditor (f).

Appendix: Provision Findings

115.11 (a)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes

115.11 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes

115.11 (c)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes

115.12 (a)	Contracting with other entities for the confinement of inmates	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	yes

115.12 (b)	Contracting with other entities for the confinement of inmates	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure 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 OR the response to 115.12(a)-1 is "NO".)	yes

115.13 (a)	Supervision and monitoring	
	Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	Does the agency ensure that each facility has documented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the generally accepted detention and correctional practices in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any judicial findings of inadequacy in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from Federal investigative agencies in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from internal or external oversight bodies in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration all components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated) in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the composition of the inmate population in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into	yes

	consideration the number and placement of supervisory staff in calculating adequate staffing levels and determining the need for video monitoring?	
	Does the agency ensure that each facility's staffing plan takes into consideration the institution programs occurring on a particular shift in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any applicable State or local laws, regulations, or standards in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the prevalence of substantiated and unsubstantiated incidents of sexual abuse in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any other relevant factors in calculating adequate staffing levels and determining the need for video monitoring ?	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 in non-exigent circumstances? (N/A here for facilities with less than 50 inmates before August 20,2017.)	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 here for facilities with less than 50 inmates before August 20,2017.)	na

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?	yes

115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility implement a policy and practice 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	yes

	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?	
	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 with inmates with disabilities including inmates who: Have intellectual disabilities?	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: 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 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
	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, or 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?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes

115.21 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes

115.21 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes

115.21 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.21(d) above.)	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 such publication 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).)	yes

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 such education?	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 have received 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 Garrity warnings? (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 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?	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?	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?	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 suspicions of sexual abuse and sexual harassment?	yes

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.)	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?	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?	yes
	Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.32?	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 screening instrument?	yes

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) Whether the inmate is detained solely for civil immigration purposes?	yes

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, when 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, when 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, when 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 a: Incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: 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 information is not exploited to the inmate's detriment by staff or other inmates?	yes

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 present management or security problems?	yes

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?	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?	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?	yes

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 access to programs, privileges, education, or work opportunities, does the facility document: The opportunities that have been limited?	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The duration of the limitation?	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The reasons for such limitations?	yes

115.43 (c)	Protective Custody	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes

115.43 (d)	Protective Custody	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes

115.43 (e)	Protective Custody	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes

115.51 (a)	Inmate reporting	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes

115.51 (b)	Inmate reporting	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	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?	yes

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.	yes

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 this standard.)	yes
	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, including toll-free hotline numbers where available of local, State, or national immigrant services agencies?	no
	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 abuse or sexual harassment or retaliation?	yes

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 response to an incident of sexual abuse?	yes

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?	no

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 residents 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 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?	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 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 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).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes

115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes

115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes

115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes

115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes

115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes

115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes

115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes

115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes

115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes

115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes

115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes

115.73 (c)	Reporting to inmates	
	Following a 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 posted within the inmate's unit?	yes
	Following a 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 a 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 a 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 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?	yes

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 evidence sufficient to substantiate the allegation?	yes

115.78 (g)	Disciplinary sanctions for 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?	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?	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 sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes

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.)	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.)	na

115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes

115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes

115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes

115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes

115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes

115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes

115.86 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes

115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes

115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes

115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes

115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes

115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes

115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes

115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant 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?	yes

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 three-year period starting on August 20, 2013, and during each three-year period thereafter, 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.? (N/A before August 20, 2016.)	yes

115.401 (b)	Frequency and scope of audits	
	During each one-year period starting on August 20, 2013, 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?	yes

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 (f)	Audit contents and findings	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports within 90 days of issuance by auditor. The review period is for prior audits completed during the past three years PRECEDING THIS AGENCY AUDIT. In the case of single facility agencies, the auditor shall ensure that the facility's last audit report was published. 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 that there has never been a Final Audit Report issued.)	yes