

PREA Facility Audit Report: Final

Name of Facility: Green Bay Correctional Institution

Facility Type: Prison / Jail

Date Interim Report Submitted: 05/07/2018

Date Final Report Submitted: 09/24/2018

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: Howard Ray Jr	Date of Signature: 09/24/2018

AUDITOR INFORMATION	
Auditor name:	Ray, Howard
Address:	
Email:	Howard.Ray@maryland.gov
Telephone number:	
Start Date of On-Site Audit:	04/09/2018
End Date of On-Site Audit:	04/11/2018

FACILITY INFORMATION	
Facility name:	Green Bay Correctional Institution
Facility physical address:	2833 Riverside Drive, Green Bay, Wisconsin - 54307
Facility Phone	
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:	Stephanie Cummings	Title:	Corrections Program Supervisor
Email Address:	stephanie.cummings@wisconsin.gov	Telephone Number:	920-436-3360

Warden/Superintendent			
Name:	Scott Eckstein	Title:	Warden
Email Address:	Scott.eckstein@	Telephone Number:	920-436-3350

Facility PREA Compliance Manager			
Name:		Email Address:	
Name:	Stephanie Cummings	Email Address:	Stephanie.Cummings@wisconsin.gov

Facility Health Service Administrator			
Name:	Jean Lutsey	Title:	Health Service Manager
Email Address:	Jean.Lutsey@wisconsin.gov	Telephone Number:	920-436-3390

Facility Characteristics			
Designed facility capacity:	749		
Current population of facility:	1081		
Age Range	Adults: 18-78	Youthful Residents:	
Facility security level/inmate custody levels:	Maximum, medium, Minimum		
Number of staff currently employed at the facility who may have contact with inmates:	316		

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:	Cathy.Jess@wisconsin.gov	Title:	Secretary
Email Address:	Cathy.Jess@wisconsin.gov	Telephone Number:	(608) 240-5065

Agency-Wide PREA Coordinator Information			
Name:	Leigha Weber	Email Address:	Leigha.Weber@wisconsin.gov

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 on site audit on the Green Bay Correctional facility was conducted on April 9-11 2018 by Howard Ray Jr (Lead Auditor) and Rose Betek US Department of Justice PREA Certified auditors for Adult Prisons and Jails from the state Maryland. The audit was conducted as part of an inter state consortium consisting of Pennsylvania, Maryland, Michigan and Wisconsin . Audit notices were posted throughout the facility 6() six weeks prior to the on site review . Leigha Weber Wisconsin Department of Corrections PREA Analyst verified that the notices were posted and during the onsite visit notices were observed through the facility . The auditor received (2) two letters from the facility .

The Audit was conducted by using the On Line Audit System (OAS) developed by the PREA Resource Center . Green Bay Correctional Center was requested to complete the PREA Audit Questionnaire and it was provided to the auditors along with supporting documents that were uploaded to OAS in the weeks prior to the on site audit phase . The PRE-Audit preparation by the auditors included a thorough review of all documentation and materials submitted by the facility along with the data included in the PRE-Audit Questionnaire . The documentation review include agency and facility policy and procedure, forms, education materials, training curriculum, organizational charts, posters, brochures, site maps, photographs, camera site locations, staffing plan and other PREA related materials that were provided to demonstrate compliance with PREA standards .

On Monday April 9,2018 at 8:30 am an initial briefing took place at the Green Bay Correctional Facility .The briefing was attended by Howard Ray (lead auditor) Rose Betek auditor,Stepaney Cummings compliance manager,Leigha Weber agency representative, John Kind security director and Steve Shueler deputy warden . During the entrance briefing the tour itenary was disscused along with the review of requested materials as well as request for additional materials . The auditor advised the group that at the conclusion of the on site visit there would be additional review of materials and the evaluation of interviews and observations made during the visit . The auditor advised the facility that there could be additional disscussion ,request and clarification during the post audit phase . A staff roster and an inmate roster were provided and the auditors were provided seperate rooms to conduct interviews . Staff and inmate interviews were conducted using the US Depatment of Justice PREA guidelines . Once the entrance briefing was completed the auditors toured the facility .

During the tour the auditor reviewed and observed the following : Supervision levels in housing units and program areas; blind spots; compliance with policy,procedure and practice; placement of cameras; observation platforms; staff deployment and supervision; housing unit and cell layout to include showers,,bathroom stalls and their privacy . There were signs posted in housing units (the facility could utilize more visibility with signs throughout the facility) . The shower area (Bathhouse) allowed inmates to shower separately with a privacy curtain with camera coverage as not to negate privacy . All the other dormitory showers provided for security and privacy . There are a total of 196 cameras throughout the facility with additional cameras added to the new visiting room and shower house . Cameras are

monitored from central control in addition to a tower which can also monitor all of the outside areas . There are several additional monitoring stations within the facility which have monitoring capabilities .

The Green Bay correctional facility is a maximum security facility which was originally opened in 1889 . Despite the facility age the agency continues to invest in its physical plant .The facility was clean at the time of the audit . The facility staffing was adaptive to the housing and programming at the facility . The auditors were provided with all of the additional documentation requested and given access to all of the facility .

An exit briefing was conducted on Wednesday April 11, 2018 which included Stephanie Cummings Compliance Manager, John Kind Security Director and Steve Schueler Deputy Warden .

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.

GBCI is a maximum security correctional institution located in Brown County between Green Bay , De Pere and the Fox and East rivers. In 1897 , the Wisconsin Legislature approved \$75,000 for construction of a state reformatory for m,ale offenders ranging in the age of 17-30 years old . An old brick bicycle factory and a 198 acres were purchased , then named the Wisconsin State Reformatory (WSR) , which first housed eight inmates , transferring from Waupun Correctional Institution on August 31, 1898 .

Prison construction occurred in the next two decades: North Cell Hall 1898-1904; South Cell Hall and Administration Building from 1915-1922; and a wooden fence by 1916 for the main compound, which was replaced seven years later by the 22-foot concrete wall that still stands today . These new facilities served a population of more than 800 inmates .

In order to alleviate overcrowding in 1932 , the state legislature altered the age requirements for offenders housed at WSR to 16-25 years . In 1972 WsR became a maximum-security prison for adult males . The name was changed to Green Bay Correctional Institution on July 1, 1979.

The majority of the 29 acre grounds are contained within the perimeter walls The Green Bay current population is 1080 which are housed in the original 294-bed cell halls, one dormitory unit, a mainstream unit, and a restrictive housing unit . The facility also includes a kitchen; two dining rooms; a power plant;; textile facilities; academic and vocational education; health services; a chapel; psychological and social services ; maintenance facilities; indoor and outdoor recreation facilities; a shower building; a visiting room; and administrative offices .

The facility has 197 cameras deployed throughout the facility with additional cameras requested for the housing and industry areas .The program areas are staffed by civilian and correctional staff with few cameras , however due to the time of operation and the rounds that the staf keep and pass accountability it is sufficient .

Currently Green Bay Correctional Center is staffed with 188 correctional officers, 50 sergeants and 15 security supervisors .During the first and second shift there are two security supervisors assigned to the shift (1 captain and 1 lieutenant) ,however when available and additional captain and lieutenant are assigned to shift one and two .The third shift has one security supervisor assigned . Each of the housing units has four (4) correctional officers and (1) one sergeant assigned .

The auditor observed the new construction of the South Bath House and visiting Room .Both were designed for maximum electronic and staff observation. Throughout the tour there was evidence of structured mass movement and a pass system ,however though there were PREA signs the auditor recommends additional signs be posted so as they are more visible . The facility was clean and staff were extremely helpful.

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

115.41(f) The Green bay Correctional Center did not have a process in place for transgender inmates to sepearatley shower in privacy .

115.64(a) Interviews and the tour confirmed that the Green bay security officers were unfamiliar with first responder responsibilities .

115.64(b) Interviews and the tour confirmed that non security staff were not familiar with their responder responsibilities .

115.81(a) Green bay Correctional Center could not demonstrate that iindividuals identified as victims during the initial screening were refered for tratment, treated or declined treatment .

115.81(b) Green bay Correctional Center could not demonstrate that individuals identified as perpetrators during the initial screening were referred for treatment, treated ordeclined treatment .

Number of Standards Exceeds : 0

Number of Standards Met : 42

115.11, 115.12, 115.13, 115.14, 115.15, 115.16, 115.17, 115.18, 115.21, 115.22, 115.31, 115.32, 115.33, 115.34, 115.35, 115.41, 115.43, 115.51, 115.52, 115.53, 115.54
115.61, 115.62, 115.63, 115.65, 115.66, 115.67, 115.68, 115.71, 115.72, 115.73, 115.76, 115.77, 115.78, 115.82, 115.83, 115.86, 115.87, 11588, 115.89, 115.401, 115.403

Number of Standards Not Met : 3

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>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Greenbay Correctional Facility Organizational Chart 4. Interviews with PREA Coordinator and Manager <p>Findings (By Subsection):</p> <p>115.11 (a) Wisconsin Department of Corrections (WIDOC) has a comprehensive policy on sexual abuse and sexual harassment. Executive Directive 72, Sexual Abuse and Sexual Harassment in Confinement (PREA) Section V clearly states that they have a zero tolerance for sexual abuse and sexual harassment in all of its facilities, including those in which they contract with.</p> <p>115.11 (b) WIDOC has designated Leigha Weber as agency-wide PREA coordinator. Ms. Weber reports that she has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities.</p> <p>115.11 (c) The Greenbay correctional Center has designated Stephanie Cummings as the facilities PREA Compliance Manager. Ms. Cummings reports that she has sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards.</p> <p>Corrective Action: None</p>

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Signed confinement contracts 3. Correspondence with the contract administrator 4. Policy 5. Monitoring Tool <p>Findings (By Subsection):</p> <p>115.12 (a) WIDOC contracts with 11 other entities for the confinement of its inmates. All of the contracts require that entity to adopt and comply with the PREA standards.</p> <p>115.12 (b) WIDOC actively monitors monitors all contracts .the agency has developed a monitoring process wich entails : Policy DAI 410.00.01 PREA Compliance Review of Contract Facilities in addition to a compliance report DOC-2845 .Currently 7 contract facilities received a monitoring visit with four (4) scheduled for PREA audits in 2018.</p> <p>Corrective Action: None</p>

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Greenbay Correctional Facility Staffing Plan (May 18, 2017) 3. Interviews with PREA Coordinator and Manager 4. Rounds Log Books 5. PREA Staffing Plan Annual Review Log 6. Greenbay Correctional Facility Procedure 7. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) <p>Findings (By Subsection):</p> <p>115.13 (a) The agency has ensured that MWCC has developed a staffing plan on an annual basis and it takes into account the following:</p> <ol style="list-style-type: none"> 1. Generally accepted detention and correctional practices; 2. Any judicial findings of inadequacy; 3. Any findings of inadequacy from Federal investigative agencies; 4. Any findings of inadequacy from internal or external oversight bodies; 5. All components of the facility's physical plant 6. The composition of the inmate population; 7. The number and placement of supervisory staff; 8. Institution programs occurring on a particular shift; 9. Any applicable State or Local laws, regulations, or standards; 10. The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and 11. Any other relevant factors. <p>115.13 (b) Greenbay did not have any circumstances where the staffing plan is not complied with. When a circumstance arises, they will fill the needed position with overtime.</p> <p>115.13 (c) On an annual basis, Greenbay was able to show documentation that in consultation with the PREA coordinator that they assess, determine, and document whether they need to make changes to the staffing plan, need for additional cameras or other monitoring technologies and whether or not they have enough staff to ensure that Greenbay can adhere to the staffing plan.</p> <p>115.13 (d) In the Greenbay log books, it clearly shows that supervisors are making rounds on all shifts. Interviews conducted with supervisory staff indicated that they make those rounds unannounced. Interviews with line staff confirmed that supervisor's make unannounced rounds on all shifts and they occur at different times/days so a pattern is not developed. Greenbay facility Procedure # 900.306.05.02 and Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) both prohibit staff members from alerting or notifying other employees that supervisory rounds are occurring.</p>

Corrective Action: None

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none">1. Pre-Audit Questionnaire2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) Section XII. C.3. Interviews with PREA Coordinator and Manager4. Letter from the Administrator, Division of Adult Institutions5. Inmate Roster <p>Findings (By Subsection):</p> <p>115.14 (a-c) The WIDOC Division of Adult Institutions prohibits youthful offenders from being housed in an Adult Institution. All Youthful Offenders are now housed within the Wisconsin Division of Juvenile Corrections. A review of the inmate roster and interviews with the Superintendent of the facility confirmed that they have not housed any youthful inmates at MWCC within the past 12 months.</p> <p>Corrective Action: None</p>

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) Section X 3. Division of Adult Institutions (DAI) Policy # 306.17.02, Searches of Inmates 4. Interviews with Staff & Inmates 5. Availability of female staff/Staff roster 6. Lesson title: Introduction to Body Searches 7. Demonstration of search technique <p>Findings (By Subsection):</p> <p>115.15 (a) Both Executive Directive 72 & DAI Policy # 306.17 2 prohibit cross-gender strip searches or cross-gender body cavity searches except in exigent circumstances. Interviews with inmates and staff verified that these types of searches have not happened.</p> <p>115.15 (b) Both Executive Directive 72 & DAI Policy # 306.17 2 prohibit cross-gender pat-down searches of female inmates except in exigent circumstances. (male facility) The facility has not had to conduct any cross gender strip searches or cross-gender visual body cavity searches in an exigent circumstance. Agency policy (Executive Directive 72) requires that if the need were to occur, the facility would document those searches. Based off of interviews, staff are aware of this policy and the requirement to document such searches if this type of search was needed.</p> <p>115.15 (d) Executive directive 72 establishes a policy that enables inmates to shower , perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing there breasts, buttocks, or genitalia, except in exigent circumstances. Greenbay Correctional Facility has a specific tone that is broadcast over the loud speaker system to announce the presence of female staff. This was used when the Auditor went on the tour and it was confirmed through inmate interviews that staff use this system and the inmates know what that tone symbolizes.</p> <p>115.15 (e) Executive Directive 72, states that staff may not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmates genital status is unknown, they may determine the inmates genital status through conversations with the inmate, reviewing medical records or by learning information that was part of a broader medical examination conducted in a private setting by medical personnel. This was confirmed by staff and inmate interviews.</p> <p>115.15 (f) WIDOC has an extensive lesson plan dealing with body searches. Lesson Title: Introduction to Body Searches goes into great detail on how to conduct Pat, Strip, Body Cavity, and Body Content Searches. Staff are trained on how to conduct these searches in addition to</p>

searches of transgender and intersex inmates so they are searched in a professional and respectful manner that is least intrusive as possible but still meets security needs. This training was confirmed by staff demonstration .

Corrective Action: None

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. DAI Policy #: 300.00.35 4. Staff and Inmate Interviews 5. Language Line (face time demonstrated) 6. Executive Directive 71: Language Assistance Policy and Implementation for Addressing Needs of Offenders with Limited English Proficiency (LEP) <p>Findings (By Subsection):</p> <p>115.16 (a) Executive Directive 72 Section XI.B.4. ensures that inmates who have a disability have an equal opportunity to participate in or benefit from all aspects of WIDOC's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.</p> <p>115.16 (b) Executive Directive 71 establishes a policy on how to ensure that residents who are limited English Proficient (LEP) have access to all aspects of the facility's efforts related to preventing, detecting, and responding to sexual abuse and sexual harassment. WIDOC has a contract with an interpretation services company to provide a way of communicating with inmates who do not speak English. This was tested onsite and staff knew about this service.</p> <p>115.16 (c) Executive Directive 72 prohibits staff from relying on inmate interpreters or other types of inmate assistants except in exigent circumstances. Staff was well aware of the language interpretation line and how to use this service.</p> <p>Corrective Action: None</p>

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Application form 3. Interviews with HR Staff 4. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) <p>Findings (By Subsection):</p> <p>115.17 (a) Executive Directive 72 prohibits the hiring or promoting of anyone who may have contact with inmates and prohibits the enlisting of services of any contractor who has engaged in sexual abuse in a confinement setting, has been convicted or attempted to engage in sexual activity in the community and/or anyone who has been civilly or administratively adjudicated to have engaged in any sexual activity.</p> <p>115.17 (b) The agency has documentation supporting that it considers any incident of sexual harassment when deciding to hire or promote anyone or to enlist the services of a contractor who may have contact with inmates.</p> <p>115.17 (c) Depending on whether a new hire is considered a direct hire or not, either the Center Office or the Facility completes a criminal background check on that person that is Consistent with Federal, State, and local law. If an individual is considered a direct hire, the facility would do a criminal background check. For all others, the Central Office would complete a criminal background check. A sample of new hires and staff that was promoted was reviewed to ensure that these background checks were being done.</p> <p>115.17 (d) WIDOC performs a criminal background check before enlisting the services of any contractor. This was verified by interviews and supporting documentation.</p> <p>115.17 (e) WIDOC has a system in place to ensure that employees have a criminal background check every 5 years.</p> <p>115.17 (f) The Agency/Facility both ask all applicants and employees who may have contact with inmates directly about previous sexual misconduct in written applications. WIDOC also requires current employees to disclose any such misconduct as they occur.</p> <p>115.17 (g) Agency policy and interviews with HR staff confirm that material omissions regarding sexual misconduct, or the provision of materially false information are grounds for determination.</p> <p>115.17 (h) Interviews with HR staff confirm that the agency will provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from another institutional employer.</p>

Corrective Action: None

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (Documents, Interviews, Site Review): 1. Pre-Audit Questionnaire 2. Interviews with Staff 3. Facility tour Findings (By Subsection): 115.18 (a) Greenbay Correctional Center recently added a new bath house to the north and south housing units in addition to a new visiting center . 115.18 (b) The facility design for both of these projects utilized monitoring technology (camera) with the physical design maximizing the space for good observation . The areas are well lighted and take into consideration sound security practices . Corrective Action: None

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Interviews with PREA Coordinator, PREA Manager, and Random Staff <p>Findings (By Subsection):</p> <p>115.21 (a) Greenbay is responsible for conducting administrative investigations. If the incident is or appears to be criminal, the Brown County will conduct those investigations. All investigations follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence.</p> <p>115.21 (b) The protocol used by Greenbay is adapted from the National Commission on Correctional Healthcare Response to Sexual Abuse (2014).</p> <p>115.21 (c) Sexual abuse incident occur at Greenbay require the victim would be sent to St. Vincents hospital were there are sane/safe nurses on duty on each shift. The auditor spoke with the hospital and verified that they do have Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) on staff. If a SAFE/SANE is not on duty someone is always available on call. Services are provided to the victim without financial cost pursuant to Executive Directive 72 Section XVI.</p> <p>115.21 (d) Greenbay makes available to the victim a qualified agency staff member (Certified Social Worker) to serve as a victim advocate. Greenbay has an agreement with Sexual Assault Center and Open Door Youth Services for advocacy and supportive services. 115.21 (e) WIDOC Executive Directive 72 Section XVI requires Greenbay to allow a victim advocate, qualified staff member, or qualified community based member to accompany the victim through the forensic medical examination process and investigatory interviews if requested by the victim. Greenbay has not had any inmates in the past 12 months who reported sexual abuse.</p> <p>115.21 (f) WIDOC Executive Directive 72 Section XVII requests that the Brown County follow the requirements of paragraph (a) through (e) of this section.</p> <p>Corrective Action: None</p>

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Interviews 3. WIDOC Webpage 4. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) <p>Findings (By Subsection):</p> <p>115.22 (a) WIDOC Executive Directive 72 mandates that all allegations of sexual abuse and sexual harassment are investigated completely.</p> <p>115.22 (b) The agency has a policy in place that if the allegation is potentially criminal, it will be investigated by the Brown County. All other investigations are handled by the facility by PREA trained investigators. WIDOC publishes this information on its webpage under Prison Rape Elimination Act Unit.</p> <p>115.22 (c) Executive Directive 72 which is posted on the WIDOC webpage under Prison Rape Elimination Act details the responsibility of both the agency and the local law enforcement agency responsible for criminal investigations.</p> <p>Corrective Action: None</p>

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Staff Interviews 3. Online PREA Training Module <p>Findings (By Subsection):</p> <p>115.31 (a) Greenbay submitted documentation from their PREA staff training curriculum. New employees receive classroom training in the academy. Staff already at the facility received PREA training every two years via an online training module. All employees are trained on the following 10 mandated elements:</p> <ol style="list-style-type: none"> 1. WIDOC's zero-tolerance policy for sexual abuse and sexual harassment; 2. How to fulfill their responsibilities to prevent, detect, and report sexual abuse and sexual harassment; 3. How inmates have the right to be free from sexual abuse and sexual harassment; 4. Inmates and employees have the right to be free from retaliation for reporting sexual abuse and sexual harassment; 5. The dynamics of sexual abuse and sexual harassment in confinement setting; 6. Common reactions of sexual abuse and sexual harassment victims; 7. Detecting and responding to signs of threatened and actual sexual abuse; 8. How to avoid inappropriate relationships with inmates; 9. How to communicate effectively and professionally with inmates, including LBGTQI inmates; and 10. How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. <p>115.31 (b) All WIDOC employees receive training for dealing with both female and male inmates.</p> <p>115.31 (c) Greenbay was able to show that all employees at their facility have been trained on PREA. In years where training is not mandatory, staff receive refresher information.</p> <p>115.31 (d) WIDOC's online PREA training module requires that staff receive an 80% or higher in order to pass the course. Individuals who fail the test are able to review the video again and retake the exam. This is logged into the computer system.</p> <p>Corrective Action: None</p>

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Interview with Volunteer 3. Training Documentation 4. PREA Guide for Volunteers and Contractors Pamphlet <p>Findings (By Subsection):</p> <p>115.32 (a) WIDOC Policy requires each volunteer and contractor who has contact with inmates to be trained on their responsibilities related the agency’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Greenbay reports that 125 volunteer and contractors have been trained for PREA.</p> <p>115.32 (b) Greenbay requires all volunteers and contractors who have contact with inmates to go through an orientation class that includes PREA training.</p> <p>115.32 (c) Greenbay requires all volunteers and contractors to sign an acknowledgment stating that they have received and understood the training.</p> <p>Corrective Action: None</p>

115.33	Inmate education
	<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 1010 360">Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol data-bbox="252 412 1299 613" style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Interviews with Intake Staff, Inmate Training Staff, and Inmates 3. Sexual Abuse and Sexual Harassment Prevention and Intervention Handbook 4. Inmate PREA Video 5. Tour Observations <p data-bbox="252 669 587 703">Findings (By Subsection):</p> <p data-bbox="252 754 1453 956">115.33 (a) Greenbay inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment during the intake process. They are also given information on how to report incidents or suspicions of sexual abuse. Inmates are told about these policies and are given a Sexual Abuse and Sexual Harassment Prevention and Intervention handbook during intake.</p> <p data-bbox="252 1012 1481 1124">115.33 (b) Greenbay provides a more comprehensive education on their rights to be free from sexual abuse and sexual harassment a video that is in English and Spanish that inmates are required to watch.</p> <p data-bbox="252 1180 1485 1292">115.33 (c) Greenbay was able to document that all inmates were trained on the PREA standards.. Also, Agency Policy Executive Directive 72 requires that all inmates receive PREA education upon transfer to a different facility.</p> <p data-bbox="252 1348 1477 1639">115.33 (d) The agency and Greenbay provide education in multiple formats to all inmates including those who are limited English proficient, deaf, visually impaired, or otherwise disabled. Some examples included audio for visually impaired individuals and Spanish signs/videos for those who are limited English proficient. Finally, the agency has a language interpretation line and a video face time interpretation line during interviews staff said they use the lines if needed to help ensure those inmates who are limited English proficient and deaf received the proper PREA training. (demonstration of video line was performed for auditor) .</p> <p data-bbox="252 1695 1473 1762">115.33 (e) Greenbay maintains a training log that inmates sign in order to document that they have received PREA education.</p> <p data-bbox="252 1818 1474 1975">115.33 (f) Greenbay had minimal posters throughout the facility related to PREA and also had the PREA Sexual Abuse and Sexual Harassment Prevention and Intervention Handbook readily available for inmates.(The auditor recommends additional poster in none housing unit areas where the posters are visible)</p> <p data-bbox="252 2031 561 2065">Corrective Action: None</p>

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) Section XI 3. Training Curriculum 4. Training Power point Slides 5. Interviews with Investigatory Staff <p>Findings (By Subsection):</p> <p>115.34 (a) All WIDOC Investigatory Staff receive the training that is required in § 115.31. Investigatory Staff received extensive training in Madison, Wisconsin at the Central Office related to conducting PREA investigations in a confinement setting.</p> <p>115.34 (b) A review of the training curriculum and based off of interviews with investigatory staff, they were properly trained in interviewing sexual abuse victims. They were also able to explain when to use Miranda and Garrity warnings. The training also included evidence collection.</p> <p>115.34 (c) WIDOC has 317 trained investigators and each individuals training is maintained in a database.</p> <p>Corrective Action: None</p>

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Training Curriculum 3. PREA Training Computer Module 4. Interviews with Medical and Mental Health Care Staff <p>Findings (By Subsection):</p> <p>115.35 (a) WIDOC has trained all Medical and Mental Health Care Practitioners on the following 4 mandated elements:</p> <ol style="list-style-type: none"> 1. How to detect and assess signs of sexual abuse and sexual harassment 2. How to preserve evidence 3. How to respond effectively and professionally to victims of sexual abuse and sexual harassment 4. How and to whom to report allegations or suspicions of sexual abuse and sexual harassment. <p>115.35 (b) This substandard is N/A. All inmates requiring forensic medical examinations are sent to the hospital where the examination is performed by either a SAFE/SANE nurse.</p> <p>115.35 (c) WIDOC has trained 40 Medical and Mental Health Care workers at Greenbay. The training is documented on a training log.</p> <p>115.35 (d) ALL employees having contact with inmates including Medical and Mental Health Care workers receive the training required under § 115.31. Documentation of the training received is maintained at Greenbay and can be found on the training log.</p> <p>Corrective Action: None</p>

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Interviews with Staff and Inmates 3. PREA Screening Tool 4. Inmate Roster 5. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) Section XII <p>Findings (By Subsection):</p> <p>115.41 (a) WIDOC Executive Directive 72 Section XII requires all inmates to be assessed during intake and upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates.</p> <p>115.41 (b) WIDOC Executive Directive 72 Section XII requires all intake screenings to take place within 72 hours of arrival. Based on a sample of intakes, Greenbay meets that requirement and usually conducts the screening the same day.</p> <p>115.41 (c) Greenbay uses an objective screening instrument to assess inmates of their risk of being sexually abused by others or being sexually abusive toward other inmates.</p> <p>115.41 (d) Greenbay uses an objective screening instrument that uses the following criteria to assess the inmates risk of sexual victimizations:</p> <ol style="list-style-type: none"> 1. Whether the inmate has a mental, physical, or developmental disability 2. Age of the inmate 3. Physical build of the inmate 4. Prior incarceration status 5. Whether prior incarceration status is exclusively nonviolent 6. Prior convictions for sex offenses 7. Whether the inmate is LBGTI, or gender nonconforming 8. Experienced prior sexual victimization 9. Inmates own perception and vulnerability 10. Whether the inmate is detained solely for civil immigration purposes <p>115.41 (e) The initial screening tool considers prior acts of sexual abuse, prior convictions for violent offenses, and prior history of institutional violence to determine if the inmate is at risk of being sexually abusive.</p> <p>115.41 (f) Greenbay currently reassess the inmates risk of victimization or abusiveness within 30 days of arrival to the facility.</p>

115.41 (g) WIDOC Executive Directive 72 requires Greenbay to reassess an inmates status when warranted. This was confirmed during staff interviews stating that they would reassess an inmate when new information is learned.

115.41 (h) WIDOC Executive Directive 72 states that an inmate may not be disciplined for refusing to answer or not disclosing completed information related to the intake screening tool.

115.41 (i) Greenbay secures all the screening forms . Based off of interviews and access location of the forms, only those staff who need to know have access to the information disclosed or obtained on the form.

Corrective Action: None

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Staff and Inmate Interviews 3. Risk of Abusiveness (ROA) or Risk of Victimization (ROV) Database 4. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) <p>Findings (By Subsection):</p> <p>115.42 (a) WIDOC Executive Directive 72 states that the facility shall use the information obtained in the screening tool to help keep those at high risk of being sexually victimized from those at high risk of being sexually abusive in housing, bed, work, education, and program assignments. Greenbay classifies those inmates as either a ROA or ROV and tries to keep those individuals separate from each other as much as possible.</p> <p>115.42 (b) WIDOC Executive Directive 72 requires individualized determinations how to ensure the safety of each inmate. This was confirmed that it was being done through the screening staff.</p> <p>115.42 (c) Greenbay reported that they have a population of transgender inmates within the last 12 months. During interviews with staff, they said that they would consider whether to house those inmates in a male or female institution on a case-by-case basis which is consistent with Agency policy.</p> <p>115.42 (d) Greenbay reported that they have a population of transgender inmates within the last 12 months. During interviews with staff, they said that they were aware of the Agencies policy and currently reassess those inmates at least twice a year.</p> <p>115.42 (f) Green-bay reported that they have a population of transgender inmates with the last 12 months. Green-bay at the time of the audit did not insure that all transgender inmates were able to shower individually and separate .</p> <p>115.42 (e) WIDOC Executive Directive 72 requires a transgender or intersex inmate’s own views with respect to his or her own safety shall be given serious consideration. Interviews with staff the compliance manager and Warden affirmed the policy would be upheld .</p> <p>115.42 (g) WIDOC Executive Directive 72 prohibits placing lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units or wings solely on the basis of such identification or status. Based off of interviews and tour observations, there is no reason to believe that Greenbay is not following policy.</p> <p>Corrective Action Plan:</p>

115.42(f) Green bay should provide a spread sheet identifying the transgender inmates ,where they are housed along with the frequency and times for showers..During the audit (April 9-11-2018) there were 5 inmates who had not been afforded privacy for showers .The facility should provide information on any additional transgender inmates received at the facility during the corrective action.

Corrective Action :

115.42(f) Green bay has provided documentation that transgender inmates are able to shower separately from the general population along with the location and frequency .Since the Audit one transgender inmate was assigned to Green bay and the facility has demonstrated that it has provided accommodation to the inmate for showers .

115.43	<p>Protective Custody</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Staff and Inmate Interviews 3. Tour Observations 4. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) <p>Findings (By Subsection):</p> <p>115.43 (a) WIDOC Executive Directive 72 Section XIII prohibits placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives have been made. Greenbay does not place high risk inmates in segregated housing.</p> <p>115.43 (b) Greenbay does not place high risk in segregated housing. Therefore, Greenbay is unable to restrict access to programs, privileges, education, and work opportunities. This was verified by tour observations and interviews with staff.</p> <p>115.43 (c) Greenbay does not place high risk inmates segregated housing. This was verified by tour observations and interviews with staff.</p> <p>115.43 (d) Greenbay does not place high risk inmates segregated housing. This was verified by tour observations and interviews with staff.</p> <p>115.43 (e) Greenbay does not place high risk inmates in segregated housing. This was verified by tour observations and interviews with staff.</p> <p>Corrective Action: None</p>
--------	---

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Staff and Inmate Interviews 3. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 4. Tour Observations 5. Wisconsin DOC website <p>Findings (By Subsection):</p> <p>115.51 (a) WIDOC provides multiple internal ways for inmates to privately report PREA related issues. Inmates are given a red PREA guidebook and within that guidebook it list all the internal ways an inmate can report. Inmates can tell any staff person, send a request to any staff person, Call the PREA hotline reporting number, and or tell a family member and they can submit a report through the Wisconsin DOC webpage.</p> <p>115.51 (b) WIDOC also provides inmates ways to report sexual abuse and sexual harassment that is not part of the agency. Inmates are able to contact local law enforcement and they are also able to call 888 from their inmate phones. There is no pin needed and the call goes directly to an outside entity that is not part of the agency. They are able to immediately forward all reports to agency officials and If the inmate chooses to, they can remain anonymous upon request.</p> <p>115.51 (c) WIDOC policy mandates that staff need to accept all reports and shall document any verbal reports. Interviews with staff confirmed that they would accept any type of report made, whether it was verbal, in writing, anonymous, or from a third party.</p> <p>115.51 (d) WIDOC policy states that staff can utilize the same methods of reporting that inmates can use. Interviews with MWCC staff verified that they were well aware of how they could privately report sexual abuse and sexual harassment of inmates.</p> <p>Corrective Action: None</p>

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Interviews with PREA Coordinator & Administrative Remedies Staff Person <p>Findings (By Subsection):</p> <p>115.52 This Standard is N/A. WIDOC does not have a formal administrative procedure to address inmate grievances regarding sexual abuse. If a report of sexual abuse is submitted through the administrative remedies system, it is immediately forwarded to facility Deputy Warden or PREA Compliance manager.</p> <p>Corrective Action: None</p>

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Interviews with PREA Compliance Manager, Local Advocacy Group, & Random Staff 4. Tour Observations <p>Findings (By Subsection):</p> <p>115.53 (a) Greenbay makes available to inmates a local support services organization, there information is posted in the facility. The Sexual Assault Center and Open Door Youth Services provide emotional support and advocacy .Thie Sexual Assult and Youth Services at 300 Crook St. Greenbay WI 54301 providies support services to inmates who need support services related to sexual abuse. Greenbay does not house individuals solely for civil immigration purposes.</p> <p>115.53 (b) In the WIDOC inmate handbook, inmates are informed about the extent to which communications will be monitored. Inmates receive this information well before they are giving access to outside support services.</p> <p>115.53 (c) WIDOC and Greenbay Correctional Center have a current memorandum of understanding with the Sexual Assault Center and open Door Youth Services.</p> <p>Corrective Action: None</p>

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Staff Interview 3. Wisconsin Website <p>Findings (By Subsection):</p> <p>115.54 (a) The Wisconsin Department of Corrections website lists all the staff who work in the PREA Unit with their contact number. Also on the website is an email link with instructions for third party reporting.</p> <p>Corrective Action: None</p>

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Interviews with Staff <p>Findings (By Subsection):</p> <p>115.61 (a) Executive Directive 72 Section XIV requires all staff to report immediately any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility. The Directive also prohibits retaliating against any inmate or staff who would report an incident of sexual abuse or sexual harassment. Interviews with staff indicated that they understood their reporting obligation.</p> <p>115.61 (b) Executive Directive 72 Section XIV prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary. Interviews with staff indicated that they understood that they were only to reveal information to those who needed to know.</p> <p>115.61 (c) Executive Directive 72 Section XIV requires all Medical and Mental Health Staff to report Sexual Abuse and Sexual Harassment to officials. Medical and Mental Health Staff have inmates signed informed consents at the initiation of services.</p> <p>115.61 (d) Executive Directive 72 Section XIV requires the facility to report any sexual abuse allegation of youthful and vulnerable adults to the designated entity under the applicable mandatory reporting laws. Since Greenbay does not house any youthful offenders, staff indicated that they would report any sexual abuse allegations of a vulnerable adult to the proper authorities.</p> <p>115.61 (e) Agency policy requires all allegations of sexual abuse and sexual harassment including third-party and anonymous reports. Staff interviews confirmed that they would report any and all allegations of sexual abuse and sexual harassment.</p> <p>Corrective Action: None</p>

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (Documents, Interviews, Site Review): 1. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 2. Staff Interviews Findings (By Subsection): 115.62 (a) Executive Directive 72 Section XVI requires that the facility take immediate action to protect an inmate when its learns that an inmate is subject to a substantial risk of imminent sexual abuse. In the past 12 months, Greenbay has not had a case where they have learned about an inmate who was subject to a substantial risk of imminent sexual abuse. Staff at Greenbay said they would take every measure possible to keep that inmate safe. Corrective Action: None

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (Documents, Interviews, Site Review): 1. Pre-Audit Questionnaire 2. Interview with Staff and Superintendent 3. Incident Report Findings (By Subsection): 115.63 (a,b & c) WIDOC has a policy that requires a facility that has received an allegation of an inmate who was sexually abused at another facility, the head of the facility that receives the allegation must notify the head of the facility where the allegation occurred within 72 hours. Greenbay had two (2) incidents and the allegation was sent via an incident report to the Warden of the facility where the allegation occurred. 115.63 (d) Greenbay has received two (2) allegations of sexual abuse from other facilities . Corrective Action: None

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Interviews with Staff 3. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) <p>Findings (By Subsection):</p> <p>115.64 (a) WIDOC Executive Directive 72 Section XVI details the first responder duties for a security staff member in accordance with the following:</p> <ol style="list-style-type: none"> 1. Separate the alleged victim and abuser 2. Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence 3. If the abuse occurred within a time period that still allows for collection of physical evidence, request that the alleged victim not take any actions that could destroy the physical evidence 4. If the abuse occurred within a time period that still allows for collection of physical evidence, ensure that the alleged abuser not take any actions that could destroy the physical evidence <p>Interviews with Greenbay security staff confirmed they were not knowledgeable of first responder responsibilities .</p> <p>115.64 (b) WIDOC Executive Directive 72 Section XVI details the first responder duties for non-security staff member in accordance with the following:</p> <ol style="list-style-type: none"> 1. Request that victim not take any actions that could destroy physical evidence 2. Notify security staff <p>Interviews with Green Bay non security staff confirmed they were not knowledgeable on there responder responsibilities .</p> <p>Corrective Action Plan:</p> <p>The Green Bay Correctional facility should retrain all security and non security staff on first responder and secondary responder responsibilities .In order to be in compliance with 115.64 (a&b) the facility will need to provide documentation of such training .</p> <p>Corrective Action:</p> <p>115.64(a&b) The Green Bay Correctional facility provided documentation that all employees were re trained on first responder responsibilities .Documentation on each employee was provided to the auditor with signatures of the employee .</p>

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (Documents, Interviews, Site Review): 1. Pre-Audit Questionnaire 2. Interviews with Staff 3. MWCC Coordinated Response Plan Findings (By Subsection): 115.65 (a) Greenbay has a coordinated response plan. The plan details what each person/discipline should do if a sexual abuse incident were to occur. The Warden at Greenbay indicated during his interview that Greenbay staff are trained on how to initially respond to an incident of sexual abuse and will take appropriate actions. Corrective Action: None

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (Documents, Interviews, Site Review): 1. Pre-Audit Questionnaire 2. Staff Interviews Findings (By Subsection): 115.66 (a) The WIDOC has not entered into any collective bargaining agreement or any other agreement that would limit the agency's ability to remove alleged staff sexual abusers from contact with any inmate pending the outcome of an investigation. Interviews with the Warden confirm that they would remove alleged staff sexual abusers from contact with inmates if warranted. Corrective Action: None

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Interviews with Warden & Staff <p>Findings (By Subsection):</p> <p>115.67 (a) WIDOC Executive Directive 72 establishes an agency policy that protects all staff and inmates who report sexual abuse or sexual harassment from retaliation by others.</p> <p>115.67 (b) WIDOC Executive Directive 72 establishes different measures for protecting inmates and staff members who fear retaliation for reporting sexual abuse/harassment. Interviews with the Staff and Warden both confirm that they will do everything possible to keep those who have reported safe. Some examples of things they would do is housing changes, transfers to another institution, and removal of alleged staff to name a few.</p> <p>115.67 (c) WIDOC Executive Directive 72 requires the facility to monitor the conduct and treatment of those who report sexual abuse or sexual harassment for a minimum of 90 days. Interviews with the Warden, Compliance manager and the Social Worker confirmed they are the individuals who would monitor for retaliation.</p> <p>115.67 (d) WIDOC Executive Directive 72 requires periodic state check of those who report sexual abuse and sexual harassment. Interviews with the Warden Compliance manager and social worker confirmed they would conduct periodic status checks to ensure that there were no signs suggesting possible retaliation.</p> <p>115.67 (e) WIDOC Executive Directive 72 requires that anyone who cooperates with an investigation and fears retaliation will receive appropriate measures to help protect that individual against retaliation. Interviews with the Warden confirmed that he would take the necessary steps to protect any individual who cooperates with an investigation.</p> <p>Corrective Action: None</p>

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Tour Observations <p>Findings (By Subsection):</p> <p>115.68 (a) WIDOC Executive Directive 72 prohibits the placement of inmates who allege to have suffered sexual abuse in involuntary segregated housing unless an assessment of all available alternatives has been made. Greenbay does not place inmates who have alleged sexual abuse or sexual harrassment in involuntary segregated housing.</p> <p>Corrective Action: None</p>

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Interviews with Investigatory staff and compliance manager 4. Review sample criminal and administrative reports <p>Findings (By Subsection):</p> <p>115.71 (a) WIDOC Executive Directive 72 Section XVII mandates that Investigators investigate all allegations of sexual abuse and sexual harassment promptly, thoroughly, and objectively for all allegations. Interviews with staff in charge of conducting investigations confirmed that they follow this policy.</p> <p>115.71 (b) WIDOC has trained 317 staff member in the Department who have received specialized training in sexual abuse investigations. These staff members received a training certificate demonstrating that they have completed the training.</p> <p>115.71 (c) WIDOC Investigators were trained in how to gather and preserve direct and circumstantial evidence. WIDOC follows their evidence protocol and first responder protocol related to protecting and preserving the scene and evidence. If the sexual abuse allegation potentially involves criminal behavior, Brown County would be called and they would be in charge of the investigation.</p> <p>115.71 (d) WIDOC policy states that when there is evidence that appears to support criminal prosecution, Greenbay would contact Brown County and they would take over the investigations. Greenbay Investigators Interviewed said that they would document this transaction.</p> <p>115.71 (e) WIDOC Executive Directive 72 Section XVII prohibits requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation. Also, the credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis. Interviews with Greenbay trained investor’s corroborated this policy is followed in practice.</p> <p>115.71 (f) WIDOC Executive Directive 72 Section XVII requires the Investigations staff to make an effort to determine whether staff actions or failures to act contributed to the abuse and document in a written report a description of the evidence, the reasoning behind credibility assessments, and investigative facts and findings. Interviews with Greenbay trained investor’s corroborated this policy is followed in practice.</p> <p>115.71 (g) The Milwaukee Police Department conducts all criminal investigations for</p>

allegations of criminal activity at MWCC. Their reports follows the requirements of this standard.

115.71 (h) Brown County conducts all criminal investigations for allegations of criminal activity at Greenbay. Any substantiated allegations of conduct that appears to be criminal would be forwarded for prosecution.

115.71 (l) WIDOC Executive Directive 72 Section XVII requires that all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse and sexual harassment for as long as the alleged abusers is incarcerated or employed by the agency, plus 10 years.

115.71 (j) WIDOC Executive Directive 72 Section XVII requires that if the alleged abuser or victim departs the facility, that the investigation still proceed. Interviews with Greenbay trained investigator's corroborated this policy is followed in practice.

115.71 (k) All investigations are required to be in compliance with WIDOC Executive Directive 72 .

115.71 (l) WIDOC Executive Directive 72 Section XVII requires that when an outside investigation of sexual abuse occurs, that the facility cooperate with outside investigators and that they remain informed about the progress. Interviews with Greenbay confirmed that they remain informed about the progress of the investigation.

Corrective Action: None

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none">1. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA)2. Interviews with Investigatory staff <p>Findings (By Subsection):</p> <p>115.72 (a) Executive Directive 72 Section XVII prohibits Investigatory staff from imposing a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Interviews with Greenbay trained investor's corroborated this standard is followed in practice.</p> <p>Corrective Action: None</p>

115.73	Reporting to inmates
	<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 1011 360">Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol data-bbox="252 416 1401 573" style="list-style-type: none"> 1. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 2. Sample Notification Letter 3. Interviews with Investigatory staff 4. Pre-Audit Questionnaire <p data-bbox="252 629 587 663">Findings (By Subsection):</p> <p data-bbox="252 707 1485 909">115.73 (a) WIDOC Executive Directive 72 Section XVII requires the inmate to receive notification as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. In the past 12 months Greenbay has completed 7 investigations of alleged abuse and harrassment in the facility. Greenbay was able to show the auditor letters of notification</p> <p data-bbox="252 965 1485 1088">115.73 (b) WIDOC Executive Directive 72 Section XVII requires the facility to request relevant information from the investigation in order to inform the inmate. Interviews with the compliance manager and Investigator confirmed that this is the practice .</p> <p data-bbox="252 1144 1485 1223">115.73 (c) WIDOC Executive Directive 72 Section XVII requires the facility to inform the inmate who alleges that a staff member committed sexual abuse against the inmate whenever:</p> <ol data-bbox="252 1267 1469 1514" style="list-style-type: none"> 1. The staff member is no longer posted within the inmate's unit 2. The staff member is no longer employed at the facility 3. The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility 4. The agency learns that the staff member has been convicted on a charge related to sexual abuse with the facility <p data-bbox="252 1570 1485 1648">115.73 (d) WIDOC Executive Directive 72 Section XVII requires the facility to inform the inmate who alleges that another inmate committed sexual abuse against the inmate whenever:</p> <ol data-bbox="252 1693 1461 1861" style="list-style-type: none"> 1. The agency learns that the alleged abuser has been indicted or a charge related to sexual abuse within the facility 2. The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. <p data-bbox="252 1906 1485 1984">115.73 (e) WIDOC Executive Directive 72 requires all notifications or attempted notifications to be documented. Greenbay provided the auditor with examples of letters.</p> <p data-bbox="252 2040 560 2074">Corrective Action: None</p>

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 2. Pre-Audit Questionnaire 3. Interview with Prea compliance manager and Human Resource manager <p>Findings (By Subsection):</p> <p>115.76 (a) WIDOC Executive Directive 72 Section XIX states that staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Greenbay reports that there have been no staff who have been disciplined for violating the agencies sexual abuse and sexual harassment policies.</p> <p>115.76 (b) WIDOC Executive Directive 72 Section XIX states that termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.</p> <p>115.76 (c) WIDOC Executive Directive 72 Section XIX states that disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment shall be commensurate with the nature and circumstances of the acts committed, the staff members disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. Greenbay reports that there have been zero staff who have been disciplined for violating the agencies policies relating to sexual abuse and sexual harassment.</p> <p>115.76 (d) WIDOC Executive Directive 72 Section XIX states that all terminations for violations of agency sexual abuse or sexual harassment, or resignations by staff that would have been terminated shall be reported to Milwaukee Police Department unless it was clearly not criminal. Those staff who have a license by a licensing board and violent the agencies policy regarding sexual abuse and sexual harassment, Greenbay will also report those violations to the applicable licensing body.</p> <p>Corrective Action: None</p>

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Interviews with the Warden and Compliance manager <p>Findings (By Subsection):</p> <p>115.77 (a) WIDOC Executive Directive 72 Section XIX provides that any contractor or volunteer who engages in sexual abuse shall be prohibited from contract with inmates. Potentially criminal conduct would be reported to Brown County and to any relevant licensing bodies. Greenbay reports that they have had zero reports of sexual abuse of an inmate by a contractor or volunteer.</p> <p>115.77 (b) WIDOC Executive Directive 72 Section XIX requires the facility to take appropriate remedial measures and considers whether to further prohibit contact with inmates by a contractor or volunteer who has violated the agencies sexual abuse and sexual harassment policies. Greenbay reports that they have not had to take any measures against a volunteer or contractor for violating the agency policy.</p> <p>Corrective Action: None</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Facility Deputy Warden and Compliance Manager <p>Findings (By Subsection):</p> <p>115.78 (a) WIDOC Executive Directive 72 provides that inmates who have committed offender-on-offender sexual abuse are subject to disciplinary sanctions pursuant to a formal disciplinary process.</p> <p>Greenbay reports that during that past 12 months there have been one (1) administrative and one (1) criminal findings of inmate-on-inmate sexual abuse.</p> <p>115.78 (b) WIDOC Executive Directive 72 provides that the sanctions for inmate-on-inmate sexual abuse should be commensurate with the nature and circumstances of the violation, the inmates disciplinary history and the sanctions imposed for comparable offenses by other inmates with similar histories.</p> <p>115.78 (c) WIDOC Executive Directive 72 provides that the disciplinary process shall consider whether a perpetrating inmates mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.</p> <p>115.78 (d) WIDOC Executive Directive 72 provides that Greenbay consider requiring perpetrating inmates to participate in interventions, such as therapy or counseling. Greenbay should also address and correct the underlying reasons or motivations for abuse.</p> <p>115.78 (e) WIDOC Executive Directive 72 provides that an inmate may only be disciplined for sexual contact with an employee upon a finding that the employee did not consent to such contact.</p> <p>115.78 (f) WIDOC Executive Directive 72 prohibits disciplinary action against an inmate that made a report of sexual abuse in good faith even if an investigation does not establish evidence sufficient to substantiate the allegation. The sexual abuse report does not constitute a false report.</p> <p>Corrective Action: None</p>

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Interviews with Medical and Mental Health 4. Authorization for Disclosure of Non-Health Confidential Information Form 5. Authorization for Use and Disclosure of Protected Health Information Form <p>Findings (By Subsection):</p> <p>115.81 (a) WIDOC Executive Directive 72 Section XII requires that all inmates who have disclosed prior sexual victimization during an intake screening are offered a follow-up meeting with a mental health practitioner within 14 days of the initial or follow-up screening. During the past 12 months, Greenbay had nine (9) inmate who disclosed prior sexual victimization and that individual was offered a follow-up meeting with a mental health practitioner. There was no tracking system or documentation that verified that the 14 day follow up took place .</p> <p>115.81 (b) WIDOC Executive Directive 72 Section XII requires that all inmates who have previously perpetrated sexual abuse, as indicated during the intake screening are offered a follow-up meeting with a mental health practitioner within 14 days of the screening. During the past 12 months, Greenbay had five (5) inmate who previously perpetrated sexual abuse and that individual was offered a follow-up meeting with a mental health practitioner. There was no tracking system or documentation to verify that the 14 day follow up took place .</p> <p>115.81 (d) WIDOC Executive Directive 72 Section XII requires that appropriate controls be placed on the dissemination of information gathered from the initial and follow-up screenings to ensure that sensitive information is not exploited. Information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health clinicians and other employees, as necessary, to inform treatment pans and security and management decisions.</p> <p>115.81 (e) WIDOC Executive Directive 72 Section XII requires medical and mental health practitioners to obtain informed consent from the inmates before reporting information about prior sexual victimization that did not occur in an institutional setting. Interviews with medical and mental health staff confirmed that they follow this policy and the auditor reviewed a copy of the informed consent form.</p> <p>Corrective Action Plan:</p> <p>Prior to the audit which occured on April 9-11 2018 .The auditor discussed with compliance manager Stephanie Cummings that there should be a system in place to document that the 14 day referrals for 115.81 took place .The Pre-audit information and discussion substantiated that there was no referral verification The Compliance manager took the proactive steps to</p>

Address all the concerned parties in her memorandum (PREA REFERRAL TRACKER) dated March 30,2018 which addressed the 14 day referral issue . The memorandum is as follows: For PREA Compliance standard 115.81," we have to track PSU/HSU referrals that happen during the intake PREA assessment. We created a tracking system to make sure that once the referral is completed by the Social Worker and forwarded to PSU/HSU that the follow up is completed and documented within 14 days When i receive a copy of the DOC-3183 from the social worker i will enter that in the trackers for HSU and PSU follow up. This will help me as the Compliance Manager to make sure we are meeting standards and for future audits" . To show compliance the facility will need to demonstrate through the Referral Tracker and meeting notes or forms that the referral meetings took place .

Corrective Action:

115.81(a) The facility as stated in the compliance plan has developed a tracking system which is monitored by the PREA compliance manager .The spread sheet list name,number,transfer date,screening date ,ROA/ROV identification and 14 day follow up . The facility provided the latest spread sheet documentation .

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Interviews with Medical and Mental Health Staff 3. Interviews with Security and Non-Security Staff 4. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 5. Off-Site Service Request and Report (DOC-3001) Form <p>Findings (By Subsection):</p> <p>115.82 (a) WIDOC Executive Directive 72 Section XVI requires inmate victims of sexual abuse to receive timely, unimpeded access to emergency medical treatment and crisis intervention series that is determined by medical and mental health practitioners according to their judgement. Interviews with medical and mental health providers indicated that the victim would receive the medical services required by this subsection.</p> <p>115.82 (b) WIDOC Executive Directive 72 Section XVI requires that if no qualified medical or mental health practitioners are on duty at the time of a report of recent sexual abuse is made, staff first responders will take steps to protect the victim and will notify the appropriate medical practitioners immediately. Interviews with both security and non-security staff verified that this would be the practice if an incident were to occur.</p> <p>115.82 (c) WIDOC Executive Directive 72 Section XVI requires inmate victims of sexual abuse while incarcerated to be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis. Interviews with medical staff confirmed that this policy is in practice at Greenbay.</p> <p>115.82 (d) WIDOC Executive Directive 72 Section XVI requires that sexual abuse victims receive treatment services at no cost.</p> <p>Corrective Action: None</p>

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
Auditor Overall Determination: Meets Standard	
Auditor Discussion	
<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Tour Observations 4. Interviews with Medical and Mental Health Staff <p>Findings (By Subsection):</p> <p>115.83 (a) Executive Directive 72 Section XVI requires Greenbay to offer medical and mental health evaluations and treatment to all inmates who have been sexual victimized while incarcerated.</p> <p>115.83 (b) Executive Directive 72 Section XVI requires and interviews with medical and mental health staff confirmed that victims of sexual abuse/harassment would receive appropriate levels of service as required by this subsection.</p> <p>115.83 (c) Executive Directive 72 Section XVI requires and interviews with medical and mental health staff confirmed that victims of sexual abuse receive medical and mental health services that is consistent with the community level of care.</p> <p>115.83 (d) Executive Directive 72 Section XVI requires and interviews with Greenbay medical staff confirm that inmate victims of sexual abusive vaginal penetration while incarcerated will be offered pregnancy tests(male facility). N/A</p> <p>115.83 (e) Executive Directive 72 Section XVI requires and interviews with Greenbay medical staff confirm that if an inmate gets pregnant as a result of sexual abuse while incarcerated the victim will receive timely and comprehensive information about all lawful pregnancy-related medical services.(male facility) N/A</p> <p>115.83 (f) Executive Directive 72 Section XVI requires and interviews with Greenbay medical staff confirm that inmate victims of sexual abuse while incarcerated will be offered test for sexual transmitted infections as medically appropriate.</p> <p>115.83 (g) Executive Directive 72 Section XVI requires and interviews with Greenbay medical staff confirm that treatment services will be provided at no financial cost for the victim.</p> <p>115.83 (h) Executive Directive 72 Section XVI requires and interviews with Greenbay mental health care staff confirm that Greenbay attempts to conduct a mental health evaluation of all know inmate-on-inmate abusers within 60 days of learning about such sexual abuse history.</p> <p>Corrective Action: None</p>	

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Interviews with the Warden ,Prea Coordinator and Prea facility manager <p>Findings (By Subsection):</p> <p>115.86 (a) Executive Directive 72 Section XX requires the facility to conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation unless it was determined to be unfounded. Greenbay reports that there have been one (1) substansiated investigations of alleged sexual abuse.</p> <p>115.86 (b) Executive Directive 72 Section XX requires the facility to conduct an incident review within 30 days of the conclusion of the investigation. Greenbay reported one (1) substansiated sexual abuse investigations. The auditor reviewed records pertaining to this sub-standard. The staff was aware of the investigative process when a sexual abuse investigation occurs and the need to conduct an incident review.</p> <p>115.86 (c) Executive Directive 72 outlines and Greenbay staff have an incident review team in place when there is a need to conduct an incident review. The team consists of the Warden ,Asst.Warden ,compliance manager the and others who are deemed necessary based on the incident.</p> <p>115.86 (d) Executive Directive 72 Section XX requires the incident review to consider the following:</p> <ul style="list-style-type: none"> • Whether the allegation of investigation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse • 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 • Whether the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse • Whether there was adequate staffing levels in that area during the different shifts • Whether monitoring technology should be deployed or augmented to supplement supervision by employees • Prepare a report of its findings and submit the report to the facility head and PREA Compliance Manager. <p>115.86 (e) Executive Directive 72 Section XX requires the facility to implement the recommendations for improvement, or shall document its reasons for not doing so. Interviews with the facility administrators indicate that this would be the practice based on any findings and recommendations from the incident review report.</p>

	Corrective Action: None
--	-------------------------

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Wisconsin DOC Website <p>Findings (By Subsection):</p> <p>115.87 (a)/(c) Executive Directive 72 Section XXI details the types of data that needs to be collected and it is, at a minimum, all the necessary data to answer all the questions from the most recent version of the Survey of Sexual Violence conducted by the DOJ. Data collected by the WIDOC is securely retained and maintained for at least 10 years after the data of initial collection.</p> <p>115.87 (b) WIDOC Executive Directive 72 Section XXI requires and practice indicates that they aggregate the incident based sexual abuse data on a annually bases.</p> <p>115.87 (d) WIDOC Executive Directive 72 Section XXI requires them to maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.</p> <p>115.87 (e) WIDOC Executive Directive 72 Section XXI requires the agency to obtain incident based and aggregated data from the private contractors it uses for the confinement of its inmates.</p> <p>115.87 (f) WIDOC Executive Directive 72 Section XXI requires that the agency provide all such data from the previous calendar year to the DOJ no later than June 30th.</p> <p>Corrective Action: None</p>

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Interviews with Agency Head, PREA Coordinator, and PREA Compliance Manager 3. WIDOC PREA Annual Report 4. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) <p>Findings (By Subsection):</p> <p>115.88 (a) WIDOC Executive Directive 72 Section XXI requires and documentation reviewed confirm that WIDOC reviews data collected and aggregated pursuant to §115.87. WIDOC prepares an annual report of its findings, and its posts that annual report on its webpage.</p> <p>115.88 (b) Executive Directive 72 Section XXI requires and documentation reviewed confirms that the annual report prepared by the WIDOC includes a comparison of the current year's data and corrective actions with those from the prior years.</p> <p>115.88 (c) Executive Directive 72 Section XXI requires that the annual report be posted publicly to the DOC's website. The auditor confirmed that the annual report is posted on the WIDOC's website.</p> <p>115.88 (d) Executive Directive 72 Section XXI states that they may redact specific material from the reports when publications would present a clear and specific threat to safety and security.</p> <p>Corrective Action: None</p>

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire 2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) 3. Interviews with PREA Coordinator <p>Findings (By Subsection):</p> <p>115.89 (a & d) Executive Directive 72 Section XXI requires that data collected pursuant to § 115.87 is securely retained and that the information is maintained for at least 10 years.</p> <p>115.89 (b) Executive Directive 72 Section XXI requires that all aggregated sexual abuse data from the facilities under its control and those that it contracts with are made readily available to the public on its website. The auditor confirmed that the data is posted on the WIDOC website under Prison Rape Elimination Act.</p> <p>115.89 (c) Executive Directive 72 Section XXI requires that all personal identifiers are removed before making the data available to the public. The auditor reviewed the reports listed on the WIDOC and did not see any personally identifiable information.</p> <p>Corrective Action: None</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> 1. WIDOC Website 2. Inmate Interviews 3. Tour Observations <p>Findings (By Subsection):</p> <p>115.401 (a) The Wisconsin Department of Corrections has 40 facilities that are required to be audited under the PREA standards. While the agency did not audit one-third of its facilities in each of the years of the first cycle it has completed all of the audits within the 3 year period.</p> <p>115.401 (h) The audit team was able to enter all areas within the facility without restriction.</p> <p>115.401 (i) The audit team was received any relevant documents that were requested.</p> <p>115.401 (m) The audit team was provide with offices that allowed for private interviews.</p> <p>115.401 (n) Inmates were able to send confidential information to the auditor in the same way they would communicate with legal counsel.</p> <p>Corrective Action: None</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <p>1. WIDOC website</p> <p>Findings (By Subsection):</p> <p>115.403 (f) The WIDOC website lists all the pervious PREA audit reports that were conducted. They can be viewed by going to the following web link http://doc.wi.gov/About/DOC-Overview/Office-of-the-Secretary/Prison-Rape-Elimination-Act-Unit.</p> <p>Corrective Action: None</p>

Appendix: Provision Findings

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

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

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

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

115.12 (b)	Contracting with other entities for the confinement of inmates	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure 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).)	yes

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).)	yes
	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).)	yes

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).)	yes
	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).)	yes
	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).)	yes

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.)	yes
	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.)	yes

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?	no
	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.)	yes

115.18 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes

115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice’s Office on Violence Against Women publication, “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

115.21 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes

115.21 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	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.)	yes

115.22 (a)	Policies to ensure referrals of allegations for investigations	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes

115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes

115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does 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?	no

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.)	na
	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.)	na

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.)	na
	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.)	na

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.)	na
	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.)	na
	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.)	na

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.)	na
	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.)	na
	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.)	na

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.)	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na

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.)	na

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?	yes
	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?	yes

115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes

115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of 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 an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes

115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually 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 prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes

115.401 (b)	Frequency and scope of audits	
	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