

PREA Facility Audit Report: Final

Name of Facility: John Burke Correctional Center

Facility Type: Prison / Jail

Date Interim Report Submitted: 12/09/2017

Date Final Report Submitted: 06/20/2018

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: Steven Cubello	Date of Signature: 06/20/2018

AUDITOR INFORMATION	
Auditor name:	Cubello, Steven
Address:	
Email:	Steven.Cubello@maryland.gov
Telephone number:	
Start Date of On-Site Audit:	10/18/2017
End Date of On-Site Audit:	10/19/2017

FACILITY INFORMATION	
Facility name:	John Burke Correctional Center
Facility physical address:	900 South Madison Street, Waupun, Wisconsin - 53963
Facility Phone	920-324-6580
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:	Peter J. Jaeger	Title:	Superint
Email Address:	900 South Madison Street	Telephone Number:	608-205-7061

Warden/Superintendent			
Name:	Peter J. Jaeger	Title:	Superintendent
Email Address:	Peter.Jaeger@wi.gov	Telephone Number:	920-324-6580

Facility PREA Compliance Manager			
Name:	Peter Jaeger	Email Address:	Peter.Jaeger@wisconsin.gov

Facility Health Service Administrator			
Name:	Lon Becher	Title:	BHS Nursing Coordinator
Email Address:	Lon.Becher@wi.gov	Telephone Number:	608-240-5144

Facility Characteristics			
Designed facility capacity:	160		
Current population of facility:	250		
Age Range	Adults: 20-75	Youthful Residents: N/A	
Facility security level/inmate custody levels:	Minimum/Minimum Community		
Number of staff currently employed at the facility who may have contact with inmates:	47		

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 (PREA) on-site audit of John Burke Correctional Center (JBCC) was conducted on October 18, 2017- October 19,2017, by Steven Cubello (Lead Auditor) and Howard Ray both from Maryland, U.S Department of Justice Certified PREA Auditors for Adult Jails and Prisons. This audit was conducted as part of an interstate consortium consisting of Pennsylvania, Maryland, Michigan, and Wisconsin. Audit notices were posted throughout the facility six weeks prior to the onsite review. Leigha Weber, PREA analyst verified by email that the notices were posted, documenting that this procedure occurred timely. To date, the Auditor has not received any correspondence from inmates located at this facility.

The audit was conducted using the PREA Online Audit System (PREA OAS) developed by the PREA Resource Center. The JBCC staff was requested to complete the Pre-Audit Questionnaire and it was provided to the auditors along with supporting documents that was uploaded to the PREA OAS in the weeks preceding the on-site review part of the audit. 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 completed Pre-Audit Questionnaire. Also, the Auditors contacted the advocacy group that the facility contracts with who was able to give us some valuable insight into the conditions in the facility. The documentation reviewed included agency policies, procedures, forms, education materials, training curriculum, organizational charts, posters, brochures, and other PREA related materials that were provided to demonstrate compliance with the PREA standards. The review prompted some questions that were asked of the PREA compliance manager during the on-site visit.

On October 18, 2017, the lead auditor entered JBCC at approximately 0900 hours and an entrance conference occurred shortly thereafter. Present were Peter Jaeger, JBCC Superintendent/PREA Compliance Manager; Cheryl Frey, WIDOC PREA Coordinator; and Kimberly Betzhold, WIDOC Investigator. After the entrance conference, a tour of the facility was conducted.

At the request of the Auditors, a staff roster (names, shift worked, job classification) and a current list of inmates was provided. The auditors were placed in private offices in order to conduct private interviews. Inmate and Staff interviewees were conducted using the recommended U.S Dept. of Justice protocols. Inmate interviewees were selected based on their housing area, special needs, randomly, and those who requested to speak to the auditors. Staff interviewees included specialized staff and random staff. JBCC has a small but adequate number of staff working at this facility, with some staff having multiple responsibilities. Due to this situation, some staff were interviewed for multiple specialties. For example, the Captain was interviewed as an investigative staff person and also as an intermediate or higher-level staff person.

During the tour, the auditor considered such things as supervision levels, blinds spots, compliance with policies, and the overall safety of inmates in this facility. As the tour progressed the auditor observed the

placement of cameras, mirrors, staff supervision, cell layout including showers, bathroom stalls, placement of posters and other PREA related information. There were no cameras placed unnecessarily that would infringe on inmate privacy. An adequate number of signs had been placed in the facility providing PREA information and the right to be free from sexual abuse and sexual harassment. The shower area allowed inmates to shower separately and shower stalls had curtains for additional privacy. The bathroom/toilet area is enclosed allowing inmates privacy while still meeting security needs. JBCC has 22 cameras on the first floor, 6 cameras on the second floor, and 2 cameras in the basement. A tour of the camera room (Control Center) was included in the tour. All of the cameras in the facility could be monitored from this location as well the Captains office. The cameras in this facility provide excellent coverage and help keep inmates safe. The need for additional cameras is reviewed annually.

To summarize the tour, JBCC is very well run. It is obvious that staff care about PREA and the inmates in general. The staff and inmates were very well informed about PREA. Staff knew exactly what to do if an incident were to occur and they understood the agencies policy on PREA.

The Auditors were treated with great hospitality during our stay at JBCC. All the staff and inmates were made readily available. We were provided with all documentation that was requested, and we were given access to all parts of the facility during the tour.

The Auditors conducted an exit conference on Thursday October, 19, 2017. At this time the auditors informed Mr. Jaeger that the onsite portion of the audit was complete however, the auditors would be continuing to review documentation and would likely be asking for additional documentation in the coming weeks. There were a few interviews that could not be conducted onsite but were conducted by phone after the onsite portion.

AUDIT FINDINGS

Facility Characteristics:

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

Facility Characteristics:

JBCC is located at 900 S. Madison St., Waupun, WI 53963. JBCC opened its door in 1990. Maximum capacity at JBCC is 250 inmates. They house minimum & minimum-community custody. JBCC provides a wide range of services, work release opportunities, re-entry, and much more.

JBCC is comprised of 1 main building that houses adult males. There are 6 ranges(3 lower and 3 upper) that house the inmate population. The dining room doubles as the visitation area. The building also has a kitchen, day room, gymnasium, weight room, health services exam room and property room. Inmate shower and restrooms are located across from the control center and have curtains that provide privacy while meeting security needs. The Superintendent's office, Captains office, Social worker's office and office support staff is located in an administrative section. There are 30 cameras located in the facility and they are viewable by staff in central control. The Captain also has the ability to view those cameras from his office. There is large outdoor rec area that includes a baseball field and basketball court that is monitored by cameras and a chain link perimeter fence that surrounds whole facility.

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

Summary of Audit Findings:

115.12: WIDOC is not currently monitoring to ensure that contractors that they contract with for the confinement of inmates are complying with the PREA standards.

115.41: JBCC is not properly conducting a reassessment of inmates within 30 days of their arrival at the facility. Also, JBCC is not completing the initial intake screening assessment within 72 hours.

Summary of Corrective Action Period:

During the Corrective Action Period, Cheryl Frey resigned as the WIDOC PREA Coordinator. Leigha Weber became the WIDOC PREA Coordinator effective May 14, 2018.

JBCC was placed into a Corrective Action Period (CAP) for being found non-compliant on 2 standards (115.12 & 115.41). JBCC was provided with guidance from the Auditor in order to comply with each standard that it did not meet. During the CAP, the facility completed all of the deficient items and is now in full compliance with all of the standards. Please refer to each individual standard for the details on how each standard was found to be compliant.

Number of Standards Exceeded: 0

Number of Standards Met: 45

• 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, 115.42, 115.43, 115.51, 115.52, 115.53, 115.54, 115.61, 115.62, 115.63, 115.64, 115.65, 115.66, 115.67, 115.68, 115.71, 115.72, 115.73, 115.76, 115.77, 115.78, 115.81, 115.82, 115.83, 115.86, 115.87, 115.88, 115.89, 115.401, 115.403

Number of Standards Not Met: 0

Standards
Auditor Overall Determination Definitions
<ul style="list-style-type: none">• Exceeds Standard (Substantially exceeds requirement of standard)• Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period)• Does Not Meet Standard (requires corrective actions)
Auditor Discussion Instructions
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. 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 Cheryl Frey as agency-wide PREA coordinator. Ms. Frey 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) John Burke Correctional Center (JBCC) has designated Peter Jaeger as the facilities PREA Compliance Manager. Mr. Jaeger reports that he 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 <p>Findings (By Subsection):</p> <p>115.12 (a) WIDOC contracts with 7 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 states that there are no active monitoring efforts currently in place to ensure that the contractor is complying with the PREA standards.</p> <p>Corrective Action Plan:</p> <p>WIDOC will need to demonstrate to the auditor that the agency is monitoring the contractor to ensure that the contractor is complying with the PREA standards.</p> <p>Corrective Action:</p> <p>During the corrective action period, the WIDOC contacted each of the facilities that they contract with to see if they have had a recent PREA audit. Those contracted facilities that did not have a recent PREA audit were required to fill out a questionnaire describing their compliance with the different standards. For any standard that the contracted facility was not in compliance with, WIDOC required the contracted facility to come up with a corrective action plan to come into compliance with those standards.</p> <p>WIDOC has developed an internal policy and procedures that outlines the monitoring process. They have also created a monitoring report form for the contractor to complete. The WIDOC contract monitor will then evaluate the contractor's response using the following methods: Observation or facility tour, policy review, document review, and/or interviews. The WIDOC PREA Coordinator sent copies of completed reports which documented the monitoring of contracted facilities.</p> <p>Based on WIDOC's progress and the plan for active monitoring in the future, WIDOC now "meets the standard".</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. JBCC Facility Staffing Plan 3. Interviews with PREA Coordinator and Manager 4. Rounds Log Books 5. PREA Staffing Plan Annual Review Log 6. 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 JBCC 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) JBCC did not have any circumstances where the staffing plan was not complied with. When a situation occurs, they will fill the needed position by using overtime.</p> <p>115.13 (c) On an annual basis, JBCC was able to show documentation that they they consulted with the PREA coordinator they assessed, determined, and documented whether there was a 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 JBCC can adhere to the staffing plan.</p> <p>115.13 (d) In the JBCC 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. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) prohibits 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 JBCC 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. Lesson title: Introduction to Body Searches <p>Findings (By Subsection):</p> <p>115.15 (a) Both Executive Directive 72 & DAI Policy # 306.17.02 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) This substandard is N/A. JBCC does not house female inmates.</p> <p>115.15 (c) Due to the makeup of the staff, 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 was aware of this policy and the requirement to document such searches if this type of search is done.</p> <p>115.15 (d) Executive Directive 72 establishes policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances. JBCC has a specific tone that is broadcast over the loud speaker system to announce the presence of male staff. They also utilize a blue light system. When the light is lit, it means that females are present on the housing unit. There is a sign under the light written in Spanish and English that specifically states that when the light is on, female staff are on the housing unit. Interviews with both staff and inmates confirmed the use of the light and tone.</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 inmate's genital status is unknown, staff may determine the inmate's 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 is trained how to conduct these searches in addition to searches of transgender and intersex inmates, so that they are searched in a professional and</p>

respective manner that is least intrusive as possible but still meets security needs. This training was confirmed by staff interviews.

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-Americans with Disability Act 4. Staff and Inmate Interviews 5. AT& T Language Line 6. Executive Directive 71: Language Assistance Policy and Implementation for Addressing Needs of Offenders with Limited English Proficiency (LEP) 7. I-Speak Cards <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 service 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) The Wisconsin Correctional Center System (WCCS) HR Department completes a criminal background check that is Consistent with Federal, State, and Local law. If an individual is a contract employee, the Central Office would do a criminal background check. A sample of new hires and promoted staff was selected and reviewed to ensure that 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. Each employee is listed in a database and every 5 years a new set of fingerprints are obtained.</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 their 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 termination.</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. Camera Project Meeting Notes/Write-up Justification Findings (By Subsection): 115.18 (a) JBCC has not substantially expanded or modified its facility. 115.18 (b) JBCC has added cameras to the weight room, this will done to enhance the facility's ability to protect inmates. 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 4. Phone Interviews with the SANE and Victim Advocacy Group <p>Findings (By Subsection):</p> <p>115.21 (a) JBCC is responsible for conducting administrative investigations. If the incident is or appears to be criminal, the Dodge County Sheriff's Office 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 JBCC is adapted from the National Commission on Correctional Healthcare Response to Sexual Abuse (2014).</p> <p>115.21 (c) If a sexual abuse incident were to occur at JBCC, the victim would be sent to St. Agnes Hospital in Fond du lac, WI. 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) JBCC makes available to the victim a qualified agency staff member (Certified Social Worker) to serve as a victim advocate. St. Agnes Hospital also offers victims of sexual assault advocacy services (ASTOP) at the hospital. Finally, JBCC has an agreement with PAVE who also is able to provide support and advocacy services.</p> <p>115.21 (e) WIDOC Executive Directive 72 Section XVI requires JBCC 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. JBCC 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 Dodge County Sheriff's Office 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 Dodge County Sheriff's Office. All other investigations are handled using 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>Corrective Action: None</p> <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 4. Training Progress Summary Report 5. Staff Roster <p>Findings (By Subsection):</p> <p>115.31 (a) JBCC submitted documentation from their PREA staff training curriculum. New employees receive classroom training in the academy. Staff already at the facility receives 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) JBCC 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 grade 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. JBCC reports that volunteer and contractors have been trained for PREA.</p> <p>115.32 (b) JBCC 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) JBCC 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
	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 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>Findings (By Subsection):</p> <p>115.33 (a) JBCC 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>115.33 (b) JBCC provides a more comprehensive education on their rights to be free from sexual abuse and sexual harassment. JBCC has a video, recorded in English and Spanish, that the inmates are required to watch.</p> <p>115.33 (c) There were no inmates found who had not been trained on the PREA standards at JBCC. Also, Agency Policy Executive Directive 72 requires that all inmates receive PREA education upon transfer to a different facility.</p> <p>115.33 (d) The agency and JBCC 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 during interviews staff said they would use that, if needed, to help ensure those inmates who are Limited English Proficient received the proper PREA training.</p> <p>115.33 (e) JBCC maintains a training log that inmates sign in order to document that they have received PREA education.</p> <p>115.33 (f) JBCC had 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.</p> <p>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 270 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 7 Medical and Mental Health Care workers at JBCC. 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 JBCC 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 the PREA assessment spreadsheet, JBCC does not meet that requirement.</p> <p>115.41 (c) JBCC 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) JBCC 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 LGBTI, 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) JBCC is not currently reassessing the inmates risk of victimization or abusiveness within 30 days of arrival to the facility.</p>

115.41 (g) WIDOC Executive Directive 72 requires JBCC 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) JBCC has done a great job securing the screening form. Based off of interviews and viewing the secure location of the forms, only those staff, who need to know, have access to the information disclosed or obtained on the form.

Corrective Action Plan:

JBCC will need to demonstrate to the auditor that any new inmate that arrives at the facility has been screened within 72 hours of arrival. Also, a reassessment for the risk of victimization or abusiveness based on any additional, relevant information received by the facility since the initial intake screening should occur within 30 days of the inmates arrival at JBCC. JBCC should provide to the auditor documentation on a monthly basis that reassessments are be conducted.

Corrective Action:

During the corrective action period, the WIDOC implemented a new statewide computer program to capture all initial intake screenings and the 30 day reassessment. The auditors were provided a computer report each month during the corrective action period showing an inmates initial screening within 72 hours of arrival at the facility and documentation that the 30 day reassessment was completed.

JBCC has satisfactory completed the corrective action plan and this standard is now considered "meets standard".

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. JBCC classifies those inmates as either a ROA or ROV and keeps them separate as much as possible. In situations where this is not possible, the inmates are directly supervised by correctional staff.</p> <p>115.42 (b) WIDOC Executive Directive 72 requires individualized determinations how to ensure the safety of each inmate. It was confirmed that the screening staff was performing this task.</p> <p>115.42 (c) JBCC reported that they have had zero transgender or intersex 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) JBCC reported that they have had zero transgender or intersex inmates within the last 12 months. During interviews with staff, they said that if they did, they were aware of the Agencies policy and would reassess those inmates at least twice a year.</p> <p>115.42 (e) JBCC reported that they had zero transgender or intersex inmates with the last 12 months. JBCC would ensure that transgender or intersex inmates can shower separately from other inmates. In fact, all the showers are individual stalls that have privacy curtains.</p> <p>115.42 (f) 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 verified this would be the practice if they had these inmates at JBCC.</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 JBCC is not following policy.</p> <p>Corrective Action: None</p>	



115.43	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. 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. JBCC does not have segregated housing.</p> <p>115.43 (b) JBCC does not have segregated housing. Therefore, JBCC 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) JBCC does not have segregated housing. This was verified by tour observations and interviews with staff.</p> <p>115.43 (d) JBCC does not have segregated housing. This was verified by tour observations and interviews with staff.</p> <p>115.43 (e) JBCC does not have 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 lists 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 JBCC 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 <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 leadership. JBCC has not had any reports of sexual abuse submitted through the administrative process by inmates in the past 12 months.</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) JBCC makes available to inmates a local support services organization, and this information is posted throughout the facility. PAVE, which is located in close proximity to JBCC provides inmates with emotional support and advocacy services. This auditor spoke with Bobbi Jo at PAVE 920-929-2300 who confirmed their role with providing support services to inmates to need support services related to sexual abuse. JBCC 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 has entered into an agreement with a community services provider (PAVE) that is able to provide confidential emotional support services related to sexual abuse.</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 reported to anyone other than to the extent necessary. Interviews with staff indicated that they understood that they were only to reveal information to the responsible employee.</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 JBCC 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 to be reported to the appropriate staff member. 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
	<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. Staff Interviews <p>Findings (By Subsection):</p> <p>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, JBCC 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 JBCC said they would take every measure possible to keep that inmate safe.</p> <p>Corrective Action: None</p>

115.63	Reporting to other confinement facilities
	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 Staff and Superintendent 3. Incident Report <p>Findings (By Subsection):</p> <p>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. JBCC has not had an allegation that was received by them that an inmate was sexually abused while confined at another facility. However, staff was aware of the policy and what they needed to do if such an incident occurred.</p> <p>115.63 (d) JBCC has not had an incident where they have received a notification from another facility stating that an inmate was sexual abused while they were incarcerated at JBCC. Staff is aware of the PREA requirement and Executive Directive 72 mandating that they investigate the allegation.</p> <p>Corrective Action: None</p>

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>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>JBCC has not had an incident where a non-security member had to act as a first responder. Interviews with non-security staff confirmed they knew their role if such an incident were to occur.</p> <p>Corrective Action: None</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. JBCC Coordinated Response Plan Findings (By Subsection): 115.65 (a) JBCC has a detailed coordinated response plan. The plan details what each person/discipline should do if a sexual abuse incident were to occur. The Superintendent of JBCC indicated that 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 Agency Head and the Superintendent 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 Agency Head, Superintendent & 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 Agency Head and Warden both confirm that they will do everything possible to keep those who have reported sexual abuse/harassment, safe. Some examples of things they would do are 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 Superintendent and the Social Worker confirmed that 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 Superintendent and Social Worker confirmed they would conduct periodic status checks to ensure that the 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 Superintendent 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. JBCC's physical plant does not allow for 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 <p>Findings (By Subsection):</p> <p>115.71 (a) WIDOC Executive Directive 72 Section XVII mandates that trained 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. JBCC reports that they have had zero allegations of sexual abuse and sexual harassment in the past 12 months.</p> <p>115.71 (b) WIDOC has trained 270 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, the Dodge County Sheriff's Office 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, JBCC would contact the Dodge County Sheriff's Office and they would take over the investigations. JBCC 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 JBCC trained investor's corroborated this policy is followed in practice.</p> <p>115.71 (f) WIDOC Executive Directive 72 Section XVII requires the Investigation's 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 JBCC trained investor's corroborated this policy is followed in practice.</p> <p>115.71 (g) The Dodge County Sheriff's Office conducts all criminal investigations for allegations of criminal activity at JBCC. Their reports follows the requirements of this standard.</p>

115.71 (h) The Dodge County Sheriff's Office conducts all criminal investigations for allegations of criminal activity at JBCC. Any substantiated allegations of conduct that appears to be criminal would be forwarded for prosecution.

115.71 (i) 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 are maintained 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, the investigation must still proceed. Interviews with JBCC trained investigator's corroborated this policy is followed in practice.

115.71 (k) N/A

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 JBCC 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 JBCC trained investor's corroborated this standard is followed in practice.</p> <p>Corrective Action: None</p>

115.73	Reporting to inmates
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. Sample Notification Letter 3. Interviews with Investigatory staff 4. Pre-Audit Questionnaire <p>Findings (By Subsection):</p> <p>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 JBCC has not had any allegations of sexual abuse in the facility. JBCC was able to show the auditor a sample letter should such an incident occur.</p> <p>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 Superintendent and Investigator confirmed that this would be the practice if an incident requiring another investigative agency were to occur.</p> <p>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 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>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 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>115.73 (e) WIDOC Executive Directive 72 requires all notifications or attempted notifications to be document. JBCC provided the auditor with a sample letter if an incident were to occur that would require notification.</p> <p>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 <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. JBCC 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. JBCC reports that there have been zero staff who have been disciplined for violating the agency's 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 Dodge County Sheriff's Office unless it was clearly not criminal. Those staff who have a license by a licensing board and violent the agency's policy regarding sexual abuse and sexual harassment, will also be reported for violations to the applicable licensing body by JBCC.</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 Superintendent <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 the Dodge County Sheriff's Office and to any relevant licensing bodies. JBCC reports that they 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 agency's sexual abuse and sexual harassment policies. JBCC 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 Superintendent Interview 4. Warden Interview <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. JBCC reports that during that past 12 months there have been zero 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 inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.</p> <p>115.78 (d) WIDOC Executive Directive 72 provides that JBCC consider requiring perpetrating inmates to participate in interventions, such as therapy or counseling. JBCC 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/c) 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, JBCC had one inmate who disclosed prior sexual victimization and that individual was offered a follow-up meeting with a mental health practitioner.</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, JBCC had one inmate who previously perpetrated sexual abuse and that individual was offered a follow-up meeting with a mental health practitioner.</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 plans 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: None</p>

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 JBCC.</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 JBCC 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) This substandard is N/A, JBCC is an all-male facility.</p> <p>115.83 (e) This substandard is N/A, JBCC is an all-male facility.</p> <p>115.83 (f) Executive Directive 72 Section XVI requires and interviews with JBCC 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 JBCC 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 JBCC mental health care staff confirm that JBCC 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 and Superintendent <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. JBCC reports that there have been zero 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. JBCC reported zero sexual abuse investigations. The auditor was unable to view any records pertaining to this sub-standard, however staff was well aware of their role if a sexual abuse investigation were to occur and there need to conduct an incident review.</p> <p>115.86 (c) Executive Directive 72 outlines and JBCC staff have an incident review team in place when there is a need to conduct an incident review. The team consists of the Warden, Facility Superintendent, the Captain of the facility, 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 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
	Evidence Reviewed (Documents, Interviews, Site Review): 1. WIDOC Website 2. Inmate Interviews 3. Tour Observations Findings (By Subsection): 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. 115.401 (h) The audit team was able to enter all areas within the facility without restriction. 115.401 (i) The audit team was received any relevant documents that were requested. 115.401 (m) The audit team was provide with offices that allowed for private interviews. 115.401 (n) Inmates were able to send confidential information to the auditor in the same way they would communicate with legal counsel. Corrective Action: None

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (Documents, Interviews, Site Review): 1. WIDOC website Findings (By Subsection): 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 . Corrective Action: None