

# PREA Facility Audit Report: Final

**Name of Facility:** St. Croix Correctional Center

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 03/02/2018

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"/>
<b>Auditor Full Name as Signed:</b> Kimberly Napier	<b>Date of Signature:</b> 03/02/2018

AUDITOR INFORMATION	
<b>Auditor name:</b>	Napier, Kim
<b>Address:</b>	
<b>Email:</b>	NapierK@michigan.gov
<b>Telephone number:</b>	
<b>Start Date of On-Site Audit:</b>	08/23/2017
<b>End Date of On-Site Audit:</b>	08/25/2017

FACILITY INFORMATION	
<b>Facility name:</b>	St. Croix Correctional Center
<b>Facility physical address:</b>	1859 North 4th Street, New Richmond, Wisconsin - 54017
<b>Facility Phone</b>	715-246-3680
<b>Facility mailing address:</b>	PO Box 36, New Richmond, New Richmond, Wisconsin - 54017
<b>The facility is:</b>	<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
<b>Facility Type:</b>	<input checked="" type="radio"/> Prison <input type="radio"/> Jail

Primary Contact			
<b>Name:</b>	JoAnne Skalski	<b>Title:</b>	Superintendent
<b>Email Address:</b>	JoAnn.Skalski@wisconsin.gov	<b>Telephone Number:</b>	715-246-3680

Warden/Superintendent			
<b>Name:</b>	Jo Skalski	<b>Title:</b>	Superintendent
<b>Email Address:</b>	JoAnn.Skalski@wisconsin.gov	<b>Telephone Number:</b>	715-246-3680

Facility PREA Compliance Manager			
<b>Name:</b>	JoAnn Skalski	<b>Email Address:</b>	JoAnn.Skalski@wisconsin.gov

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

Facility Characteristics		
<b>Designed facility capacity:</b>	94	
<b>Current population of facility:</b>	97	
<b>Age Range</b>	Adults: 18-40	Youthful Residents:
<b>Facility security level/inmate custody levels:</b>	minimum	
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	41	

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

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

<b>Agency-Wide PREA Coordinator Information</b>			
---	--	--	--

<b>Name:</b>	Leigha Weber	<b>Email Address:</b>	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) audit for the St. Croix Correctional Institution (SCCC) in New Richmond, Wisconsin was conducted on August 23rd, 24th, and 25th, 2017. The facility was audited by Department of Justice (DOJ) Certified PREA Auditor Kimberly Napier with the assistance of MDOC PREA Analyst Wendy Hart. The audit was conducted to assess the facility compliance with the DOJ PREA standards as part of a consortium agreement between the states of Wisconsin, Maryland, Pennsylvania and Michigan. This is the second time that SCCC has been audited by a DOJ certified PREA auditor. The audit process encompassed three phases, the pre-onsite audit phase, on-site audit phase and post onsite audit phase.

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

On July 18, 2017, the pre-audit questionnaire (PAQ) was made available through OAS. The PAQ consisted of the agency and facility contact information, facility characteristics, agency and facility policy and procedures, physical plant diagrams, and staffing plan. A review of the the facility website and any online information regarding SCCC was completed prior to the on-site audit phase.

On August 23, 2017 during the on-site audit phase, the auditors were greeted and introductions were made by the administrative staff at SCCC in Superintendent JoAnn Skalski conference room located in a secure area in the administration building. SCCC staff in attendance during the meeting was JoAnn Skalski, Superintendent and PCM; Leigha Weber, Agency PREA Program and Policy Analyst Advanced and Trisha Hron, Program Supervisor. The purpose of the audit and the plan for the two and a half days was discussed. The audit consisted of a complete site review of the facility on August 23rd, interviews with staff and inmates were conducted on August 24th and 25th along with documentation reviews, and a post-audit meeting on August 25 at 5:00pm. During the introductory meeting, the auditors received additional facility documentation and an overview of the facility operations. The documentation consisted of the facility diagram, staff directory, the Red Sexual Abuse and Sexual Harassment Prevention and Intervention Resource Booklet for Inmates, the Challenge Incarceration Program (CIP) handbook for both SCCC and Athena.

On August 23, 2017 at 1240pm, a facility site review of all areas that staff and inmates have access was conducted under the escort of the facility Superintendent and PREA Compliance Manager JoAnn Skalski.

Prior to entering the facility auditors were instructed to sign in and present identification card at the window. Prior to entering the secure area of the facility, administrative staff checked the identification cards of the auditors. This process gave insight to the auditors on staff procedures for processing persons in and out of the facility. The SCCC main building is a large structure that makes up the Administration building, male inmate East and West barracks including the gym, kitchen and dining hall. The West male barrack has an upper and lower level. There is a female barracks located in an adjacent to the main building in a trailer housing structure. The garage and clothing shed are detached small buildings that are adjacent to the main building. There are three housing units designated for both male and female populations. The site review included the administration building, all housing barracks for both male and female inmates (West wing, East wing and Athena), Independent living area, staff offices, unit control booths, dining hall, kitchen, back dock area, medical, school, library, maintenance garage, crew shed, clothing shed, shower and toilet area in both male and female housing barracks.

During the site review, the auditor observed the PREA audit notification and the agency PREA informational signs (English and Spanish) for inmates posted in housing barracks as well as other locations to which staff, inmates and the public have access. The auditor was able to review several housing barracks logbooks, supervisory rounding log, PREA assessment screening tools, and video monitoring systems located in each housing barrack. The auditor was able to conduct informal interviews with staff during the tour to assess the facility practice and compliance with DOJ PREA standards. The auditor was not able to conduct informal interviews with inmates as the Challenge Incarceration Program (CIP) was very controlled and inmates moved together in groups with their squad under the direction of staff. However, all inmates interviewed by the auditor knew how to report an allegation of sexual abuse or sexual harassment internally or externally. All prisoners interviewed knew of at least one way to report. When speaking with facility staff, they stated they were trained on the agency's PREA policy, knew the protocol for reporting and how to protect an inmate from sexual abuse and sexual harassment. These interviews gave the auditors insight into assessing the facility's culture and compliance with DOJ standards.

The auditors observed the facility security staff closely monitor the camera system throughout the prison in the gym and housing barracks camera system. All barrack cameras were monitored by security staff. The auditor was able to observe how security staff controlled the movement within each barrack, gym, dining room and movement to the barracks from the gym. SCCC did not have any inmate visits during the time the auditor was at SCCC.

The auditor reviewed twelve inmate risk screening and inmate education that verified both are being completed. Also, the auditor was able to verify through a random sample that employees' training records and background checks were in compliance. The agency reported there were no reported sexual abuse or sexual harassment allegations in the twelve months preceding the onsite audit phase. A review of the agency record on August 22, 2017 confirmed three cases none of which were in the 12 months preceding the onsite audit phase.

The facility staff and inmate interviews were conducted on August 24th and 25th, 2017. The two hour Warden's interview was conducted via teleconference on August 29, 2017 with DOJ Certified auditor Kimberly Napier. The interviews were conducted utilizing the DOJ PREA Compliance Audit instrument interview guides for facility warden, specialized staff, facility PREA Compliance Manager, random staff and inmates. All interviews were conducted in a private setting to protect the confidentiality of each interview. At the time of the on-site audit, there were 111 inmates at SCCC eight females and 103 male inmates. The auditor randomly selected and interviewed eight male inmates based on housing barrack and job assignment. The auditor also selected and interviewed all eight female inmates from Athena

barrack. SCCC provided the auditor with the barrack locators to select the 16 inmates. During the time of the audit, there was no disabled inmates, no limited English proficient (LEP), or LGBTI. SCCC inmates are in the Challenge Incarceration Program which is representative of a bootcamp prison where inmates are medically cleared to participate in the program. The auditor was able to confirm whether or not inmates were disabled or LEP through documentation review of inmate orientation files, interviews with inmates and onsite observation. During the onsite audit phase, the auditor was able to interview an inmate that reported sexual abuse.

Using the DOJ audit instrument interview guides, the auditor was able to query inmates about their understanding of PREA, reporting protocols at the facility and services available to them outside of the facility.

The auditor selected and interviewed 14 random staff from three different shifts (5:30am-1:30pm, 1:30pm-9:30pm and 9:30pm-5:30am) which included all barracks for male and female inmates. All staff was selected from a daily roster provided by SCCC staff. In addition, the auditor selected and interviewed nine specialized staff. The specialized staff consisted of: human resource staff, higher level facility staff, medical, incident review team member, retaliation monitoring, intake staff, staff that perform risk screening and contractor with inmate contact.

Using the DOJ audit instrument interview guides, the auditor was able to query staff regarding the agency's Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) policy and the facility's procedures for responding, reporting and investigating sexual abuse and sexual harassment in confinement. The auditor was able to conduct a formal interview with a contractor. However, the auditor was not able to interview specialized staff for mental health, segregated housing staff, staff that supervise youthful inmates or education and program staff who work with youthful inmates as youthful inmates are not housed at SCCC and there is no segregation or mental health staff.

On August 25, 2017 at 5:00pm, a post audit meeting was conducted with facility administrative staff. The administrative staff in attendance was Superintendent and PCM JoAnn Skalski; Agency Program and Policy Analyst Advanced Leigha Weber, and Program Supervisor Trisha Horn. During the post audit meeting, auditors provided facility staff with observations and two recommendations. First, the auditor recommended that the facility review their process regarding inmate reporting as inmates need to have multiple internal ways to report sexual abuse or sexual harassment privately. Specifically, through telephone and mail procedures. The telephone process in which inmates are allowed to make outgoing calls is not confidential as inmates are required to call out the telephone number of the person they are calling. Also, all inmate mail outgoing and incoming is censored by staff which does not provide a confidential means for inmates to report allegations to third parties. Secondly, the auditor recommended that once the facility receives an allegation either in writing or verbally that they investigate promptly. The facility staff made changes as a result of the recommendations. During the pre-audit, on-site audit and post audit the auditors were able to communicate openly through interviews, phone calls and emails with facility staff. SCCC staff were prepared and organized for the audit and made all documentation available to the auditors for review. The auditors would like to thank Warden Quala Champagne, Superintendent and PCM JoAnn Skalski and her staff at the St. Croix Correctional Center for providing full access to the facility during the PREA audit.

## AUDIT FINDINGS

### Facility Characteristics:

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

### FACILITY CHARACTERISTICS

The St. Croix Correctional Center (SCCC) is located in the city of New Richmond, Wisconsin is a part of the Wisconsin Correctional Center System that operates the Challenge Incarceration Program (CIP) for 120 adult male inmates and 12 female inmates. SCCC was first styled as CIP in 1991 before its completion in 1994. SCCC later expanded in 2014 to encompass the East Wing. There are currently 14 centers a part of the Wisconsin Correctional Center System. The St. Croix Correctional Center is a minimum security adult male and female facility. The age range of inmates is 18-40. At the time of the audit, there were no youthful inmates being held at SCCC.

SCCC structure is comprised of the East wing, West wing, Athena housing barracks, administration building, Gym that doubles as a dining hall, Kitchen, Garage, clothing shed and crew shed. The East and West wing barracks is designated for male inmates while the Athena barrack is for female inmates. All barracks are dormitory style with double bunks. The housing barracks have showers, bathroom stalls and sinks. The units have a base area, unit office, officer desk, and a control booth in every unit.

The facility has a staff population of 41. The supervisors consist of one superintendent and two Captains. The correctional staff positions are 20 sergeants. The correctional staff work in the barracks, dining hall, kitchen, and school. SCCC other staff positions include, one program supervisor, two administrative staff, three health service unit staff, one maintenance, one foodservice, two social workers, two treatment specialist, two Alcohol and Other Drug Abuse (AODA) staff, and four teachers. During the audit, there were 111 inmates on August 23th, 108 inmates on August 24th, and 108 inmates August 25th. SCCC has a facility capacity count of 94.

St. Croix Correctional Center is designed for inmates to complete all program requirements in 180 days. Program components are structured with discipline and rehabilitative programming. Program includes physical activity, manual work assignments, school, regimentation and discipline with military bearing, intensive (AODA) treatment and a cognitive restructuring program that helps inmates identify negative thinking that can put them at risk.

The facility has video monitoring system that is controlled by the correctional staff in each barrack. The cameras monitor and record inside and outside of the prison.

## AUDIT FINDINGS

### Summary of Audit Findings:

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

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

<b>Number of standards exceeded:</b>	1
<b>Number of standards met:</b>	44
<b>Number of standards not met:</b>	0

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

Number of standards exceeded: 1

115.18 Upgrades to facilities and technologies.

Number of standards not met: 0

Number of standards not applicable: 1

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

Number of standards met: 41

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

115.12 Contracting with other entities for the confinement of inmates.

115.13 Supervision and monitoring.

115.15 Limits to cross- gender viewing and searches.

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

115.17 Hiring and promotion decisions.

115.21 Evidence protocol and forensic medical examinations

115.22 Policies to ensure referrals of allegations for investigation.

115.31 Employee training.

115.32 Volunteer and contractor training.

115.33 Inmate education.

115.34 Specialized training: Investigations.

115.35 Specialized training: Medical and mental health care.

115.41 Screening for risk of victimization and abusiveness

115.42 Use of screening information.

115.43 Protective custody.

115.51 Inmate reporting.

115.52 Exhaustion of administrative remedies.

115.53 Inmate access to outside confidential support services.

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

## **Standards**

### **Auditor Overall Determination Definitions**

- Exceeds Standard  
(Substantially exceeds requirement of standard)
- Meets Standard  
(substantial compliance; complies in all material ways with the stand for the relevant review period)
- Does Not Meet Standard  
(requires corrective actions)

### **Auditor Discussion Instructions**

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.11	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines the Wisconsin Department of Corrections has zero tolerance for sexual abuse, sexual harassment and report-related retaliation in its facilities, including those with which it contracts for the confinement of offenders.</p> <p>The DOC provides offenders with a comprehensive orientation that details their right to be free from sexual abuse, sexual harassment and report-related retaliation. The Agency's Executive Directive #72 Sexual Abuse and Sexual Harassment in Confinement Prison Rape Elimination Act (PREA) was revised on January 11, 2016. (a).</p> <p>Agency Executive Directive #72 outlines that the DOC shall employ or designate a PREA Director to oversee department efforts to comply with PREA standards. This position shall have sufficient time and authority to coordinate the facilities efforts to comply with PREA standards in all of its facilities (b).</p> <p>The Agency employed a Agency-Wide PREA Coordinator (Cheryl Frey) who reports to Assistant Deputy Secretary in the organizational chart for the Department of Corrections Secretary's Office. Prior to PREA Coordinator Cheryl Frey's appointment, the agency employed an acting Agency-Wide PREA Coordinator (Leigha Weber) who is also the PREA Program &amp; Policy Analyst Advanced for the Wisconsin Department of Corrections. She reports that her position is a dedicated position and that she has sufficient time and authority to the development and implementation of agency efforts in PREA compliance. The auditor has observed the Ms. Weber in the performance of her duties. Ms. Weber has provided all requested documentation for investigations that are stored at the agency level, background check documentation for staff, new information from the agency that is being implemented from the agency level, hotline call request to the agency, liaison between the facility and the auditor. The agency has 38 PREA Compliance Managers, throughout the state, and each of them have a backup. As the Agency-Wide PREA coordinator, she interacts with all of the PREA Compliance Managers (b).</p> <p>Agency Executive Directive #72 outlines that the appointing authority or designee at each facility shall assign one employee as the facility based PREA Compliance Manager with sufficient time and authority to coordinate the facilities efforts to comply with PREA standards (c).</p> <p>The St. Croix Correctional Center (SCCC) employs an upper level administrator (Superintendent JoAnn Skalski) as the PREA Compliance Manager (PCM). Superintendent JoAnn Skalski states she has enough time to manage all her PREA related responsibilities and communicates with staff and inmates on a daily basis. During an interview, PCM states she has been at SCCC many years and she has good staff. PCM Skalski states she works with her supervisors, monitors staff training, work with the security director and PREA office whenever there is an issue complying with a PREA standard. The PCM was very knowledgeable on your duties and provided the auditors with full access of the facility, files</p>

and documents. The organizational chart verifies that the facility has designated who reports directly to the Warden Quala Champagne (c).

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

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

115.13	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Wisconsin Department of Corrections agency policy Executive Directive #72 states that each facility shall develop, document and make its best efforts to comply with a staffing plan that provides for adequate levels of employees, video monitoring to protect offenders against sexual abuse (a)-1.</p> <p>The St. Croix Correctional Center (SCCC) staffing plan dated May 2017 was provided for review. The staffing plan contains offender populations, physical plant, camera placement, staff supervision of inmates, staffing levels, security measures, vulnerable areas, volunteer/contractor supervision, and addressing staff shortages (a). The operating capacity is 132 (12 females/120 males). The current average daily number of inmates on which the staffing plan was predicated was 100. The daily number of inmates on August 23 was 111, August 24 was 108 and August 25, 2017 was 108 (a) 2- 3. The Warden was interviewed to confirm this information.</p> <p>SCCC is allotted one superintendent, two captains, one Corrections Program Coordinator, twenty sergeants, one food service leader, one maintenance, two treatment specialist, two social workers (one works part-time), three nurses, four teachers, two AODA staff, two administrative staff (a). SCCC is a Challenge Incarceration Program is structured with discipline and rehabilitative programming. Program includes physical activity, manual work assignments, school, regimentation and discipline with military bearing, intensive Alcohol and Other Drug Abuse (AODA) treatment and a cognitive restructuring program that helps inmates identify negative thinking that can put them at risk. Also, employment is available within the center working in food service, laundry, crew, clothing shed, greenhouse and maintenance. SCCC also offers an opportunity for inmates to earn their High School Equivalency Diploma (a). During the last 12 months, SCCC did have two reported sexual abuse or sexual harassment complaints. SCCC has not had any judicial findings of inadequacy from internal or external oversight bodies to confirm the agency practice with this provision (a).</p> <p>An annual review of SCCC staffing plan was conducted in May 2017 with the PCM and agency (c). During interview, the PCM confirmed that the staffing plan is stored electronically and reviewed annually by higher level teams (c). The auditor was also able to review the staffing plan.</p> <p>During an interview with PCM, through rounds, watching the population, and monitoring camera system we can access what is going on and follow up. A lot of our blind spots and areas of concern have been addressed we have one of the better camera systems.</p> <p>Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that supervisory staff shall conduct and document unannounced rounds, covering all shifts to identify and deter employee sexual abuse and sexual harassment. The DOC employees are prohibited from alerting other employees that these supervisory rounds are occurring unless such announcement is related to the legitimate operational functions of the facility (d).</p>

SCCC staffing plan outlines that the vulnerable areas with minimal security staff supervision such as the laundry and food service area have increased security staff rounds (d). During an interview with staff, the superintendent does weekly rounds multiple times a week on all three shifts. Staff indicated that they put the rounds in the log book. Upper level management staff indicated that they conduct rounds without telling staff that the rounds are being made. The Warden, Deputy Warden and Security Director does site visits. During these site visits they conduct rounds and look at the technology needs and physical plant with the superintendent and grounds supervisor (c, d).

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

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

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that youthful inmates shall not be placed in a housing unit in which they have sight, sound or physical contact with any adult offender through use of a shared dayroom or other common space, shower area or sleeping quarters. In areas outside of housing units, DOC shall either: maintain sight and sound separation between youthful inmates and adult offenders or provide direct staff supervision when youthful inmates and adult offenders have sight, sound or physical contact. Adult facilities shall make best efforts to avoid isolating youthful inmates to comply with this provision. Absent exigent circumstances, adult facilities shall not deny youthful inmates daily large muscle exercise and any legally required special education services to comply with this provision. Youthful inmates shall also have access to other programs and work opportunities to the extent possible. Such exigent circumstances leading to the denial of large-muscle exercise, legally required education services and/or other programming shall be documented (a, b, c).</p> <p>During interview with superintendent, she stated that the St. Croix Correctional Center (SCCC) does not house youthful inmates.</p> <p>A review of Agency policy DAI 302.00.20 Placement of Juveniles in Adult Correctional Sites indicate that juveniles will not be housed in adult correctional facilities. SCCC is an adult correctional Center that has adult inmates between the ages of 18-40.</p> <p>Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.15	<b>Limits to cross-gender viewing and searches</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1477 786">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines facilities shall not permit cross-gender strip or body cavity searches except in exigent circumstances or when performed by medical practitioners (a). Except in exigent circumstances, adult facilities shall not permit cross-gender pat-down searches of female offenders nor shall juvenile facilities permit cross-gender pat-down searches of either gender (b). All cross-gender strip and body cavity searches, in addition to cross-gender pat-down searches of females, shall be documented (c). Facilities may not search or physically examine a transgender or intersex offender for the sole purpose of determining the offender’s genital status. If the offender’s genital status is unknown, it may be determined during conversations with the offender, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner (e).</p> <p data-bbox="252 842 1477 1429">Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines in order to enable offenders to shower, perform bodily functions and change clothing without non-medical employees of the opposite gender viewing their breasts, buttocks or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks, employees of the opposite gender shall announce their presence when entering an offender housing unit. If opposite gender status quo changes during that shift then another announcement is required. Facilities shall not restrict access to regularly available programming or other out-of-cell or housing unit opportunities in order to comply with this provision (d). The auditor was able to observe this process during the onsite audit phase. Inmate interviews confirmed that they are not restricted when there is a staff of the opposite gender. For female inmates, female staff are routinely placed in their housing barrack. For male inmates, male staff are placed in their housing barracks. All inmates are monitored and move throughout the facility in squad groups. The auditor was able to observe this practice and veracity that inmates are allowed access and opportunities to comply with this provision.</p> <p data-bbox="252 1485 1477 1899">There are 26 camera in use at SCCC that monitor inside and outside of the facility. During the tour the auditors was able to view the camera system in the unit barrack at the officers stations. The camera system has the ability to record and pan. The viewing of the camera does not allow staff of the opposite gender to view inmates in the state of undress. Employees of the opposite gender must announce their presence when entering into the barracks turning on the light and by pushing the tone button. The light comes on in the inmate barrack for both male and female inmates outside the inmate bathrooms. During the tour, the auditor was able to see how this process worked (d). The auditor was able to observe both male and female staff announce prior to entering into a barrack of the opposite gender. This practice was consistent in the male and female barracks.</p> <p data-bbox="252 1955 1477 2157">Interviews with staff reveal that cross gender strip searches is a part of their training and they have yearly updates. There were no instances cross-gender strip searches, body cavity searches, within the last 12 months. A review of training records verified that all custody staff are trained consistent with this provision (a)(c). Staff also indicated that they turn on the light and push the tone button when male staff come to the outer door of the female barrack and</p>

female staff can do the same before entering the male barrack (d). Staff indicated that there was not any transgender inmates currently at SCCC. Through inmate and staff interviews and observations during the onsite audit the auditor was able to reasonable confirm there was no transgender inmates at SCCC. Staff verified that it is not permitted to search or physically examine a transgender or intersex offender for the sole purpose of determining the offender's genital status (e). Training records for ten staff were reviewed to verify that all custody staff are trained in the agency's PREA policy. Also, training lesson plan Introduction to body searches was reviewed that outlines the security staff training on how to conduct cross-gender dysphoria searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs (e,f).

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

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

115.17	<b>Hiring and promotion decisions</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1485 875">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the DOC shall not hire or promote anyone who has engaged in sexual abuse in a confinement facility; has been convicted of engaging or attempting to engage in nonconsensual sexual activity in the community; or has been civilly or administratively adjudicated to have engaged in activity described above. The DOC shall consider any incidents of sexual harassment when determining whether to hire, promote or enlist the services of any employee (a, b). Prior to hiring new staff members and enlisting the services of any employee who may have contact with offenders, the DOC shall perform a criminal background records check (c). The DOC shall make its best effort to obtain (and, when requested, provide) reference information from all prior institutional employers on substantiated allegations of sexual abuse or sexual harassment or any resignation during a pending investigation of a sexual abuse allegation (c, h). The DOC shall conduct a criminal background records check every five years for current employees (e).</p> <p data-bbox="252 927 1469 1559">Interview with Human Resource (HR) staff for Wisconsin Correctional Centers verified that back ground checks are being completed. HR staff reported that they are responsible for doing background checks on any employee or contractor. If anything shows up on a new hire background for criminal misdemeanor, the HR Manager reviews for final decision. Staff background checks every five years. The system will print out a report on what staff needs to be done and the correctional centers administrative Captain will complete the fingerprint checks on staff. Staff indicate that HR stated they do not complete background checks for the volunteers because the correctional center staff complete them. In the past 12 months, four new staff and two contracted service providers had criminal background checks. Background checks are kept for one year after hire in a secure location in HR. The facility does impose upon employees a affirmative duty to disclose misconduct. Even moving violations three or more in a two years are required to be reported if you operate a state vehicle. The only time you would not have to report is if you were the victim. There is no law that prohibits information for a former employee from being shared upon request at another institution. Former employee must go through the same process as the new hire. (a-h).</p> <p data-bbox="252 1615 1458 1688">During the last 12 months, SCCC has not had any allegation or investigation of sexual abuse or sexual harassment regarding a former employee (h).</p> <p data-bbox="252 1742 1477 1904">In the past 12 months, SCCC has two contracts for services where the providers and five staff would have contact with inmates. All six have had criminal background record checks (d). Five background checks were reviewed for staff at SCCC which verifies the facility compliance with this provision (a).</p> <p data-bbox="252 1957 1342 1991">Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.18	<b>Upgrades to facilities and technologies</b>
	<p data-bbox="252 170 927 203"><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1477 573">During the tour, SCCC has 26 cameras throughout the facility. Retention of video is stored for 30 days. Cameras are installed in all common areas with inmate access and are available to be monitored and recorded by security staff. Security staff complete rounds in these identified areas with minimal security staff supervision include: school, maintenance building, basement, laundry, gym, barracks, and food services. Only superintendent and captains have access to camera video retention (a, b).</p> <p data-bbox="252 629 1477 831">During interviews with staff, SCCC reported that they had a substantial expansion or modifications have been made to the facility since the last audit (a). East wing was added which consists of a dorm 1st floor, education 2nd, basement for shelter storms since the last audit (b). A tour of the facility East wing confirmed the expansion to SCCC. The expansion and design did consider the agency's ability to protect inmates from sexual abuse (a, b).</p> <p data-bbox="252 887 1449 1043">During the tour, in the new east wing, storage closets were designed that the lights came on automatically when you enter and the doors had see through screens that provided easy viewing. There were no blind spots to the design of the closets. These doors were in the school and East wing barracks areas for male inmates. (a, b).</p> <p data-bbox="252 1099 1445 1178">The auditor notes that this was a very innovative design on the behalf of the superintendent considered this a best practice in protecting inmates from sexual abuse in confinement.</p> <p data-bbox="252 1234 1342 1267">Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.21	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the DOC shall follow a uniform evidence protocol that maximizes the potential for preserving and or collecting usable physical evidence for administrative proceedings and criminal prosecutions (a, b). When the DOC is not responsible for investigating allegations of sexual abuse, the DOC shall request the the investigating law enforcement agency follow the requirements outlined in policy (a-f).</p> <p>During the last 12 months, SCCC did not have any sexual abuse allegations or investigations. The facility is responsible for administrative investigations only. Local law enforcement is responsible for all sexual abuse allegations (a). Post audit the facility did report an allegation of sexual abuse and the allegation was investigated (a).</p> <p>During interviews with 14 random staff, staff understood the agency’s protocol for obtaining usable physical evidence if an inmate alleges sexual abuse. SCCC staff are at a sergeant level or higher. Sergeant's knew to contact their supervisor, separate the alleged victim from the alleged suspect, secure the crime scene, preserve evidence, advise alleged victim not to brush teeth, take a shower, wash clothes, label and bag evidence. SCCC has a PREA evidence protocol, notifications process and procedure for handling evidence and notifying supervisor (a). During interview with staff, SCCC does not conduct forensic medical examinations. However, staff indicated that victims would have timely and unimpeded access to emergency medical treatment. Once the supervisor approves, contact with law enforcement and local hospital would be made to transport the victim and perpetrator separately to SANE nurses at Westfield Hospital and Clinic, 535 Hospital Road, New Richmond, WI 54017. No reports of sexual abuse exams have been conducted in the last 12 months that would confirm the agency’s practice (c).</p> <p>All victims shall be offered access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Nurse Examiners (SANE's) where possible. If SANE's cannot be made available, the examination can be performed by other qualified medical practitioners. The facility shall document it's efforts to provide a SANE (c).</p> <p>The facility shall attempt to make available to the victim an advocate from a local sexual assault service provider to accompany and support the victim through the forensic medical examination process and investigatory interviews. As requested but he victim, such a person shall also provide emotional support, crisis intervention, information and referrals. If a sexual assault service provider is not available to provide victim advocate services, the DOC shall make available a member who has been screened for appropriateness to serve in this role and has received education concerning sexual assault service provider (d, e, h).</p> <p>SCCC has a memorandum of understanding with Turning Point for Victims of Domestic and Sexual Violence Inc signed on February 24, 2017. TurningPoint provides safety, support and confidential emotional support, accompaniment, crisis intervention, information and referral to</p>

victims of sexual abuse in confinement. A review of the agency website [www.turningpoint-wi.org](http://www.turningpoint-wi.org) verified that they do provide the services. The TurningPoint staff member or volunteer can be reached 24 hours a day, 7 days a week by calling the crisis hotline at 1-800-345-5104, local phone (715) 425-6751 or 24-hour text hotline at (715) 821-8626.

In addition, SCCC has St. Croix Valley Sexual Assault Response Team (SART) Inc. The St. Croix Valley SART Inc provides a 24 hour free and confidential help and support line (715) 425-64443 for forensic evidence collection, advocacy and support services. A review of the agency website [stcroixvalleysart.org](http://stcroixvalleysart.org) confirms that they do provide the services. The facility also has a two victims services coordinator that has successfully completed 13 hours of PREA victim services coordinator training to provide services to inmates at SCCC (e).

SCCC is not responsible for investigating allegations of sexual abuse. SCCC shall request that the investigating law enforcement agency follow the requirements outlined (f). The local police department is contacted for all allegations of sexual abuse (f). SCCC did not have any investigations involving a sexual abuse allegation during the last 12 months However, SCCC did have two sexual abuse/sexual harassment investigations post audit that was investigated to confirm the agency's practice with this provision (f).

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

115.22	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the DOC shall ensure that an investigation is completed for all allegations of sexual abuse and sexual harassment, including those received from third-parties and anonymous sources. DOC shall maintain a policy(ies) that governs the conduct of such investigation (a, d). Allegations of sexual abuse or sexual harassment that involve potentially criminal behavior shall be referred for investigation to local law enforcement. All referrals to law enforcement shall be documented. The policy describing such referrals, in addition to the investigative responsibilities of the DOC and local law enforcement, shall be published and maintained on the DOC's website (b, c).</p> <p>A review of the agency's website <a href="https://doc.wi.gov/Pages/AboutDOC/PrisonRapeEliminationAct.aspx">https://doc.wi.gov/Pages/AboutDOC/PrisonRapeEliminationAct.aspx</a> reveals the that the agency does make their policy regarding the referrals of allegations of sexual abuse or sexual harassment for criminal investigation available to the public (b).</p> <p>During the last 12 months, SCCC did have an investigation or allegation of sexual abuse or sexual harassment that could confirm the facilities practice with this provision. A review f the investigation confirms that the agency does document the investigation (b).</p> <p>During interview with staff, staff indicated that the facility conducts all administrative investigations and refers all criminal investigations to local law enforcement. Staff indicated that there has been one sexual abuse and one sexual harassment investigations at SCCC during the last 12 months (a-c).</p> <p>The auditor requested to review those investigation and the agency provided a copy for review. A review of the investigations confirmed the agency's practice with this provision (b).</p> <p>Based on the evidence, the facility is in compliance with this standard.</p>

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

correctional sergeants and supervising officers are required to meet training requirements. The program syllabus is 280 hours training curriculum. The computer log shows that staff have completed the required training. Training completion certificates were also reviewed that show that staff have completed the required training for PREA (d). All staff must sign a training roster that documents the type of training they received, the acknowledgment of the content and requirements of PREA, and the training class record. Sixteen training records were reviewed that verified staff did receive required PREA training (a)(b)(c)(d). The training records were selected by the most recent course date preceding the onsite audit.

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

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

115.32	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that all volunteers and contractors who have contact with offenders shall be trained, in accordance with the type of service and level of contact they have with offenders, on the DOC's zero-tolerance policy as it related to sexual abuse and sexual harassment. They shall, additionally be trained on their responsibilities under the DOC's sexual abuse and sexual harassment prevention, detection and responses policies and procedures. Each volunteer or contractor shall acknowledge and certify to the DOC, through signature or electronic verification that they understand the training they received. The DOC 2786 PREA Sexual Abuse and Sexual Harassment in confinement training is provided to each contractor that outlines their understanding of the responsibility of training received (a-c).</p> <p>SCCC had 26 contractors and volunteers that have completed PREA training appropriate for the contact with inmates, all have been trained on the agency's zero tolerance policy, how to report instances of sexual abuse and sexual harassment. All staff must sign a training roster that documents the type of training they received, the acknowledgment of the content and requirements of PREA, and the training class record. Sixteen training records were reviewed that verified staff did receive required PREA training. The training records were selected by the most recent course date preceding the onsite audit verified staff did receive required PREA training (a-c).</p> <p>During interview, only two contractors were available for interview that confirmed they received the required training. Volunteers staff were not available at the time of the onsite audit as most volunteers provide service on the weekend. A review of the DAI volunteer orientation manual outlines that staff and volunteers who learn of any alleged sexual conduct or assault must report it to a supervisor immediately. Additionally, both Federal law and the Department's policies outline the responsibility of volunteers regarding the prevention and intervention of sexual misconduct observed or reported between staff and inmates or volunteers and inmates. This manual outlines the departments Executive Directive 72 ensures compliance with the federal law and clearly established zero tolerance stand regarding sexual contact, sexual assault and sexual harassment of offenders. Volunteers and contractors are provided an additional 27 page training powerpoint, DAI volunteer orientation, and a sexual abuse and sexual harassment in confinement guide for volunteers and contractors. The guide provides the definitions of sexual abuse, sexual harassment, consent, vulnerable offenders and indicators of abuse (a-c).</p> <p>Based on the evidence, the facility has demonstrated compliance with standard.</p>

115.33	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that at intake offenders shall receive information detailing the DOC's zero tolerance policy regarding sexual abuse and sexual harassment and how to report such incidents or suspicions (a). Also, within 30 days of intake at adult facilities the facility shall provide a comprehensive education to offenders right to be free of sexual abuse, sexual harassment and disclosure-related retaliation and the DOC's policies and procedures for responding to such incidents (b). Upon transfer to another facility, offenders shall receive education specific to the facility's sexual abuse, sexual harassment and report-related retaliation policies and procedures to the extent they differ from the previous facility (c). Offenders with disabilities or who have limited English proficiency shall have an equal opportunity to participate in or benefit from all aspects of the DOC's efforts to prevent, detect and respond to sexual abuse and sexual harassment. This includes providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary, in addition to the provision of offender education in formats accessible to all. Written materials shall be provided in formats or methods that ensure effective communication with offenders with disabilities (d). Each facility shall maintain documentation of offender participation in these education sessions (e). Each facility shall ensure that key information is continuously and readily available or visible to offenders through poster, handbooks or other written formats (f).</p> <p>At intake, inmates receive an red PREA handbook that explains the agency's zero- tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. The PREA handbook also explains the inmates right to be free from sexual abuse and sexual harassment. Within two weeks of arrival inmates attend orientation in the school where they watch a PREA video and receive a PREA orientation handout. The orientation handout tells inmates the how to use the reporting hotline number 777 and how to call outside the agency using reporting hotline number 888. The facility reported that 165 inmates within the last 12 months was given this information at intake (a)(b)(d).</p> <p>Interview with staff described the process of orientation at SCCC. Staff indicated that inmates are scheduled orientation within two weeks of arrival. During orientation inmates would sign in on the PREA education offender participation log, watch the PREA video, receive the red PREA handbook, and sign their orientation completion sheet. The inmates also receive a Challenge Incarceration Program Handbook (CIP) (f). The auditor reviewed the red handbook and was able to confirm that the red handbook provided inmates with information on how to report a sexual abuse or sexual harassment allegation. The auditor was not able to observe the intake process as all new inmate into the CIP program had already been processed. The Staff at SCCC demonstrated how the intake process works including the orientation process.</p> <p>Inmates also have PREA posting throughout SCCC in English and Spanish that provides additional information about the agency's zero tolerance policy on sexual abuse and sexual harassment. Additional PREA posters are in medical, library/school, dining hall/gym, male and</p>

female barracks, staff offices and maintenance shed (a)(b)(d).

Interview with inmates confirmed that they do received the red handbook and are orientated when they arrive within the first week at SCCC. Inmates reported that they had a class with the Sergeant and watched a video, completed paperwork, a bookmark that provided a list of who they could talk to if they wanted to report sexual abuse or sexual harassment. Inmates indicated they were explained he process of the blue light and the tone for the housing unit when a staff of the opposite sex was to enter the barrack (a, b).

During the tour, posting were located as indicated throughout the facility in English and Spanish. The posting had the numbers 777 and 888 that inmates could call from the inmate phone to report internally or externally any allegation of sexual abuse and sexual harassment (a)(b). Interviews with inmates revealed that they did receive PREA orientation information at SCCC. Inmates stated that they were aware on how to report an allegation of sexual abuse or sexual harassment. They were also aware of the agency's policy on their right to be free from sexual abuse and sexual harassment. A review of orientation records for sixteen inmates confirmed that inmates do receive orientation within two weeks of arrival and sign an orientation sheet indicating they have received orientation (e).

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

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that staff who investigate incidents of sexual abuse and sexual harassment shall receive specialized training on techniques for interviewing sexual abuse victims, proper use of Miranda, Garrity and Oddsen warnings, sexual abuse evidence collection in confinement settings and the criteria and evidence required to substantiate a case for administrative action or prosecutorial referral. The DOC shall maintain documentation of training completion (a, b, c).</p> <p>The agency keeps documentation of the required training. The auditor was able to review agency training record database that confirmed that 317 staff was trained to conduct PREA investigations consistent with provision (a- c).</p> <p>During interview with Security Director, there are 34 staff within the WCCS that are trained to conduct PREA investigations. SCCC has one investigator assigned to conduct investigations. During the on-site audit, the assigned investigator retired and SCCC was in the process of training another investigator to conduct investigations at SCCC. During an interview with the PREA coordinator and security director, both confirmed that if there was an allegation of sexual abuse or sexual harassment the investigation would have been assigned to another investigator within the agency. A review of the training records confirmed that the SCCC investigator has completed the required training. A review of the training curriculum confirmed that PREA investigators receive 40 hours of investigator training with 16 hours dedicated specifically for PREA training. Training included techniques for interviewing sexual abuse victims proper use of miranda and Garrity warning, sexual abuse collection in confinement settings and criteria and evidence required to substantiate a case for administrative or prosecution referral (a)(b).</p> <p>During the last 12 months, SCCC reported that they did not have any sexual abuse or harassment allegations preceding the on-site audit. However, SCCC did have two sexual abuse/sexual harassment investigations post audit that was investigated to confirm the agency's practice with this provision (a).</p> <p>Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.35	<p><b>Specialized training: Medical and mental health care</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that all medical and mental health care practitioners who work regularly in a DOC facility(ies) shall be trained on the subparts below. The DOC shall maintain documentation that such training has been received on how to detect and assess signs of sexual abuse and sexual harassment; how to preserve physical evidence of sexual abuse; how to respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment (a).</p> <p>There are two medical staff that regulary work at SCCC who received the training required by agency policy (a).</p> <p>During an interview, staff indicated that they received training on how to detect and access signs of sexual abuse and sexual harassment, how to preserve physical evidence of sexual abuse, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and how to report allegations or suspicions of sexual abuse and sexual harassment (a). Interview with medical staff confirmed that they do not conduct forensic examinations at SCCC that would confirm the agency's practice with this provision. Any inmate needing a SANE/SAFE examination would be transported to the local hospital at Westfield Hospital and Clinic, 535 Hospital Road, New Richmond, WI 54017</p> <p>A review of agency training records indicate that medical staff at SCCC has received required training the same as other employees (c-d).</p> <p>Based on the evidence, the facility is in compliance with this standard.</p>
--------	--

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that offenders shall be assessed during an initial screening within 72 hours of arrival at the facility, and again upon transfer to another facility, for risk of being sexually abused by other offenders or sexually abusive towards other offenders (a-e). The presence of a mental, physical or developmental disability; level of emotional and cognitive development (juveniles facilities only) Age; physical build; Previous incarcerations; exclusively nonviolent criminal history; prior convictions for sex offenses against an adult or child; is, or is perceived to be, gay, lesbian, bisexual, transgender, intersex or gender nonconforming; Previously experienced sexual victimization; prior acts of sexual abuse, prior convictions for violent offenses and/or history of prior institutional violence or sexual abuse; and offender's perception of vulnerability (d). Offenders may not be disciplined for refusing to answer or for failing to disclose information in regards to the assessment questions (h). In addition to the initial screening, within 30 days of arrival, the facility shall reassess the offender's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the initial screening (f). Thereafter, an offender's risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse or receipt of additional information that bears on the offender's risk of sexual victimization or abusiveness (g).</p> <p>The facility documented that 165 inmates entered the facility in the last 12 months and was assessed within 72 hours of arrival at intake. SCCC uses a specific PREA screening tool for female inmates (DOC-2781A) and male inmates (DOC-2781B). They risk assessment staff utilize (DOC-2781) PREA Screening tool Instructions when administering the risk screening assessment to both male and female inmates. The auditor sampled five male and five females risk screening from the last placement preceding the onsite audit that verify that referrals to mental health are offered. Also, risk assessments for male and female inmates show staff are screening inmates within 72 hours of arrival to SCCC. The risk screening tools uses screeners observation, age, height, weight, mental health, developmental or physical ability sexual orientation, LGBTI status, convictions of violent offenses, conviction of sexual offense, confinement, conduct for physical assault, victim of unwarranted sexual contact, sexual contact with someone without consent, sexual assault conducted while confined, fears of safety in the facility and sole detained for civil immigration purposes (b)(c)(d)(e).</p> <p>Interview with staff that perform risk screening and the PCM confirmed that inmates are assessed with in 72 hours of arrival. No inmates are not disciplined for refusing to answer the risk assessment screen questions (h). Staff indicated that that inmate risk assessments are stored with the social worker in the social services file that protect sensitive information from exploitation (i).</p> <p>Interview with 16 inmates confirmed that they are assessed when they first arrived at SCCC. Twelve inmates could remember whether or not they were asked the same questions again, while others could remember being asked the questions at other confinement facilities (a,b, f).</p> <p>During the last 12 months and at the time of the onsite audit, SCCC did not have a reported</p>

incident of sexual abuse or sexual harassment, referral or request to reassess an inmates risk level that would confirm the agency's practice with this provision (g).

During a discussion with the agency PREA Coordinator, the agency implemented an automated system on October 22, 2017 for risk assessment and 30 -day reassessments. Therefore, the auditor was provided six 30 day reassessments for review on December 4, 2017. This gave the auditor an opportunity to review the 30 risk assessment process documents wherein inmates were reassessed within 30 days of intake. In review of the six assessments dated 10/25/17 and 30 day reassessments on 11/22/17, SCCC did assess and reassess inmates risk of victimization and risk of abusiveness that would confirm the agency's practice with this provision (f). All of the risk screening documents are stored in the inmates confidential section of his DOC file which keeps sensitive information from being exploited. Only administration and medical and social workers have access to the inmates file (i).

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

115.42	<b>Use of screening information</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1471 618">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that information obtained from the initial or follow-up screening shall inform housing, bed, work, education and program assignments with the goal of keeping separate those offenders at high risk of being sexually victimized from those at high risk of being sexually abusive. For the purposes of education, programming, work, and recreation activities, line-of-sight monitoring by DOC staff is sufficient to maintain separation (a). Individualized placement determinations shall be made for each offender (b).</p> <p data-bbox="252 669 1481 1088">Staff utilize the risk assessments in determining proper placement for housing and work assignments. During the tour the auditor was able to review 10 PREA risk assessments for victimization (ROV) and risk of abusiveness (ROA). Post audit the auditor was able to review six risk assessments from the new automated system for tracking ROA and ROV. The tracking system show how inmates are assessed and reassessed, housed and tracked so not to have incompatible PREA risk assessment score when placed in the same barrack or work assignment. The risk assessments provide a list of screening questions that determine a inmates risk of abusiveness and a risk of victimization. Having this screening tool helps staff identify the appropriate placement for each inmate. The risk screening tools are secured in the social workers office file to keep inmate information confidential (a)(b).</p> <p data-bbox="252 1140 1477 1346">During interview with PCM, the facility uses the risk assessment screening during intake to look at bed assignments and program assignments to keep inmates safe. If there is an inmate that would need psychological services (PSU) we would transfer them out as SCC does not have a mental health team. SCCC has a team that oversees this process. (Captain, Program supervisor, AODA and Social Worker) (a,b).</p> <p data-bbox="252 1397 1471 1518">During the onsite review, the auditor reviewed 10 risk screening assessments that verified the PC assertion that there were no LGBTI inmates at SCCC to confirm the facilities practice with provision (c, d, e, f, g).</p> <p data-bbox="252 1570 1477 1691">Interviews with 16 random inmates confirmed that they were asked a series of questions upon intake. Twelve inmates could remember the questions asked while other stated that they were asked the same questions at their previous facility.</p> <p data-bbox="252 1742 1158 1776">Based on the evidence, the facility is in compliance with this standard.</p>

<b>115.43</b>	<b>Protective Custody</b>
	<p data-bbox="252 170 895 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1469 618">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that offenders at high risk for sexual victimization shall not be separated from the general population unless an assessment of all available alternatives has been made and a determination has been made that there is no available alternative means of separation from likely abusers. If an assessment cannot be conducted immediately, the facility may separate the offender involuntarily from the general population for less than 24 hours while completing the assessment (a).</p> <p data-bbox="252 669 1469 792">During the last 12 months, SCCC did not have an incident of sexual abuse or sexual harassment during the audit period that would confirm the facilities practice with this provision (a, b, c, d, e,).</p> <p data-bbox="252 842 1461 916">During the tour, SCC has a temporary holding area. However, staff indicated inmates are not housed in this area.</p> <p data-bbox="252 927 1437 1050">Interview with staff, staff stated that the facility does not have a segregated housing unit at SCCC. Also, there was no inmate that were at a high risk for victimization during the last 12 months.</p> <p data-bbox="252 1099 1477 1223">Post audit, the facility did receive an allegation of sexual abuse and sexual harassment. However, this did not require staff at SCC to utilize the temporary holding area to separate the victim from general population and from likely abusers in that case.</p> <p data-bbox="252 1272 1158 1305">Based on the evidence, the facility is in compliance with this standard.</p>

115.51	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines the DOC shall provide multiple ways for offenders to privately report sexual abuse and sexual harassment, retaliation by other offenders or employees for reporting sexual abuse and sexual harassment, and employee neglect or violation of responsibilities that may have contributed to such incidents. In addition, the DOC shall provide at least one way for offenders to report sexual abuse and sexual harassment to a public or private entity that is not part of the DOC (a, b). Employees shall accept reports made verbally, in writing, anonymously, and from third parties; promptly document any verbal reports and immediately report to supervisory staff (c). The DOC shall provide a method for employees to privately report sexual abuse and sexual harassment of offenders (d).</p> <p>During interviews with staff, staff confirmed that inmates do have multiple internal ways of reporting sexual abuse or sexual harassment. One way of reporting is inmates can call the 777 hotline from the inmate phone system, utilize the inmate grievance process or report directly to staff. When inmate calls the 777 hotline those calls go to central office in Madison Wisconsin, the grievance process is an internal mailbox that inmates can complete an interview request. Inmates can kite the PREA Compliance Manager directly or report an allegation to any staff member. Staff also stated they would report an allegation directly to their supervisor and document it in writing (a). Staff indicated that inmates can also report an allegation of sexual abuse or sexual harassment to a public or private entity that is not a part of DOC. Inmates can report outside the agency by calling 888 the local law enforcement agency in Madison Wisconsin, family or friend, Turning Point for victims of domestic violence and sexual violence by calling (800)-345-5104, St. Croix Valley SART Inc. at (715) 425-64443 and New Richmond Police Department (715) 246-6131.</p> <p>During the last 12 months, staff reported that there had not been an allegation of sexual abuse or sexual harassment at SCCC. However, SCCC did have two sexual abuse/sexual harassment investigations post audit that was investigated to confirm the agency's practice. One allegation was reported in a grievance during the on-site audit and the other was reported post audit. The auditor was able to review both completed investigations post audit to confirm the agency's practice.</p> <p>The PREA handbook for inmates provides information about reporting sexual abuse allegations to staff member. Each inmate is issued a PREA handbook at intake, a bookmark that provides SCC contacts internal and external resources of reporting sexual abuse and sexual harassment. If staff receive an allegation of sexual abuse or sexual harassment they report it immediately to their supervisor (a)(b(c))(d).</p> <p>Interview with 16 inmates revealed that they knew how to report an allegation of sexual abuse or sexual harassment at SCCC. Inmates stated they would use their bookmark, write a grievance, call home and report to family or friend, or tell a staff member by completing an interview request slip. Some inmates reported that they did not feel comfortable using the phone system to call 777 or 888 as the process requires them to announce the number to the</p>

staff when they are dialing (a-d). Some inmates indicated that if you are not announcing the number everyone would know you are calling the hotline number. Also, some inmates reported that they were not comfortable reporting through the mail as all incoming and outgoing mail is censored by staff.

During the tour, there were PREA posting in every barrack that list the local hotline number 777 and the outside hotline number 888 in English and Spanish, SCCC facility staff contacts, and outside resources for TurningPoint, St. Croix Valley SART Inc, and New Richmond Police Department. The PREA auditor notification signs was posted in every barrack including other areas that prisoners have access in English and Spanish (a)(d). During the tour the auditor used the inmate phone in the barrack to call the 777, 888, Turning point for Victims of Domestic Violence and Sexual Abuse, St Croix Valley SART inc, and the New Richmond Police Department. The auditor was able to dial 777, 888, and TurningPoint. However, the auditor was not able to dial St Croix Valley SART inc., and the New Richmond Police Department from the inmate phone system.

The auditor reviewed the facility DAI Inmate Mail Policy 309.04.01, the DAI Inmate visiting policy 309.06.01 and the DAI Monitoring and Recording of inmate Telephone Calls policy 309.39.01. Agency Policy does allow staff with the approval of the security director to monitor incoming and outgoing inmate mail. Agency Policy allows that all telephone calls except approved properly placed attorney calls may be monitored and recorded. Also, agency policy does allow visitors an opportunity to access Wisconsin facilities to visit inmates within the guidelines established.

During the exit with facility staff, the auditor recommended that the facility review the practice of requiring inmates to sign up listing the number they wish to call the night before and requiring them to announce the number when they are dialing the number. The practice of having inmates announce the number they are dialing does not provide an inmate a means of reporting an allegation of sexual abuse or sexual harassment privately when they want to dial 777, 888 or any other number that is available as an outside resources. Also, days in which an inmate could utilize the phone system was restricted to one 15 minute call every other week on opposite weekends of visits for male inmates and one 15 minute call each weekend for female inmates. Staff indicated they would review these practices.

On November 1, 2017, the auditor received memorandum notification that the facility was making changes to allow inmates to have privacy and opportunity to make calls freely. In review of the memorandum, the facility will no longer require inmates to sign up for phone calls in advance, say the phone number they are calling out loud or list and approve the individuals they are calling. In addition we will no longer require inmates to alternate phone calls weekends. Inmate phone call privileges would be allowed on free time daily, social skills time currently three times a week, barracks study time, and on weekends from 1300-1400. This will allow inmates to make calls assuring their confidentiality/privacy and ability to report any PREA concerns in a timely manner. The process will begin December 4, 2017 after the installation of additional phones in the barracks. On December 4, 2017, the auditor sent an email inquiring about the change in the process regarding the inmate phones. On December 5, 2017, the facility reported that there was some difficulty getting the barrack phones installed. The process will go into effect when the phones are installed. On December 20, 2017, the auditor was notified that the additional phone arrived at SCCC.

On January 26, 2018, the facility notified the auditor that the additional inmate phones had been installed and provided the auditor with confirmation that all staff and inmates were notified by posting on the bulletin board and via email of the new phone policy. The facility also provided the auditor with a new telephone schedule that allowed the inmates to make phone calls daily on free time, study/social skills time and on the weekends from 1230 to 1400 hours. Two new phones were installed on the East wing and four new phones installed on the upper West.

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

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

Interviews with inmates revealed that the inmates knew of the various ways of reporting including using the Inmate compliant system. Inmates also knew that they could report to a family member or friend. The auditor was able to review a grievance in which an inmate reported sexual harassment during the onsite audit. The grievance on sexual harassment investigation once completed was forwarded to the auditor which confirmed the facility does process and investigate inmate grievances.

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

115.53	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the facility shall provide offenders with access to outside victim advocates, with whom the DOC shall maintain or attempt to enter into memoranda of understanding with, for emotional support services related to sexual abuse. Access includes giving offenders mailing addresses and telephone numbers, including toll-free hotline numbers where available. The facility shall enable reasonable communication between offenders and these organizations and agencies, in as confidential a manner as possible and, in advance, provide notification to offenders of the extent to which such conversations will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws (a, b, c).</p> <p>During the tour, sexual abuse and sexual harassment posting in the male and female barracks, gym, school/library, food service, basement and other areas in the facility provide inmates access to the PREA reporting hotline phone numbers 777 for making calls inside DOC locations and hotline phone number 888 for calls outside DOC. The hotline number does not require inmates to utilize their pin number which provides a way inmates can communicate in confidential manner. This information is also available in the inmate handbook that inmates receive at intake and again during inmate orientation. Each inmate is also provided a bookmark that provides the same information posted throughout the facility (a)(b).</p> <p>Interviews with staff and inmates indicate that inmates know how to report an incident of sexual abuse and sexual harassment. Staff at intake and orientation provide the red Sexual Abuse and Sexual Harassment Prevention and Intervention handbook and orientation booklet. During interview with staff, staff confirmed that the Turning Point agency is also available to inmates at 1-800-345-5104 and St. Croix Valley SASRT Inc. (715) 425-6443. During the interviews with 16 inmates all inmates confirmed that they knew how to make contact with confidential services provided by Turing Point.</p> <p>The Wisconsin Department of Corrections (DOC) has a signed Memorandum of Understanding (MOU) with Turning Point for Victims of Domestic and Sexual Violence (SARP) to comply with Prison Rape Elimination Act (PREA). Turning Point is a sexual assault provider (SARP) that provides a safe and confidential emotional support, accompaniment, crisis intervention information and referral to victims of sexual abuse in confinement as required by the Prison Rape Elimination Act (PREA). The MOU provides an outline of the role and responsibilities of DOC and SARP which shall enhance commitment to providing advocacy services to victims of sexual abuse in confinement (a-c).</p> <p>During the Pre-audit, the facility provided the auditor with a copy of the memorandum that outlines the agreement between Wisconsin Department of Corrections and Turning Point for Victims of Domestic and Sexual Violence (SARP) dated March 9, 2017. The auditor was able to view Turning Point website <a href="http://www.turningpoint-wi.org">http://www.turningpoint-wi.org</a> to confirm that Turning Point does provide sexual assault crisis support and the 24 hour hotline. The auditor was also able to call Turning Point from the inmate phone system during the onsite audit to confirm that inmates are allowed to call without entering a PIN number by dialing (800) 345-5104. The auditor also</p>

contacted Turning Point by phone and spoke to the staff on August 24, 2017 which confirmed the agency practice with this provision (a-c).

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

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

115.61	<b>Staff and agency reporting duties</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1481 999">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that employees shall accept reports made verbally, in writing, anonymously, and from third parties; promptly document any verbal reports and immediately report any knowledge, suspicion or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the DOC; any incidents of retaliation against offenders or employees who reported such an incident; and/or any employee neglect or violation of responsibilities that may have contributed to an incident or retaliation (a). Employees shall not reveal any information related to sexual abuse or sexual harassment to anyone other than to supervisors, investigators and designated officials. Such information shall be limited to information necessary to make treatment, investigation and other security and management decisions (b). Medical and mental health practitioners duty to report, and limitations of confidentiality at the initiation of services (c). If the alleged victim is under the age of 18 or considered a vulnerable adult in accordance with State or local statute, the DOC shall report the allegation to the designated State or local services agency under mandatory reporting laws (d). All allegations of sexual abuse and sexual harassment including third party and anonymous reports shall be reported (e).</p> <p data-bbox="252 1055 1481 1384">During interviews with staff, staff reported that they knew how to report an allegation of sexual abuse and sexual harassment. Staff knew the agency zero tolerance policy, confidentiality of reporting and that sexual abuse and sexual harassment allegations had to be reported immediately. Also, the facility staff stated they would report the allegation to their supervisor and contact the facility PREA coordinator (a, b, c, e). Medical staff also knew of their duty to report an allegation of sexual abuse and sexual harassment and the limitations of confidentiality. Medical staff indicated they would disclose the limits during PREA risk screening. However, they never have youth at SCCC (c).</p> <p data-bbox="252 1440 1453 1514">Post audit, the facility provided the auditor with two administrative investigations that confirm that staff do report allegations to their supervisors and the PREA coordinator (a, b).</p> <p data-bbox="252 1570 1485 1861">The Sexual Abuse and Sexual harassment Prevention and Intervention handbook provided inmates information on reporting sexual abuse and sexual harassment complaints to staff and confidentiality of those reports (a)(b). The handbook also explains the staff duty to report to the appropriate protection agency for anyone under the age of 18 and a similar report may also be made if the victim is an older adult 60 years or older or an at risk adult (d). SCCC does not house inmates under the age of 18. Therefore, the auditor could not confirm the agency's practice with this provision (d).</p> <p data-bbox="252 1917 1158 1951">Based on the evidence, the facility is in compliance with this standard.</p>

115.62	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that When the department or facility learns that an offender is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the offender (a).</p> <p>In the past 12 months, SCCC has not had an inmate that was subject to a substantial risk of imminent sexual abuse (a). At the time of the onsite audit, the facility reported that they have not had any sexual abuse or sexual harassment administrative or criminal investigations during the last 12 months.</p> <p>However, post audit the facility provided the auditor with two administrative investigations that confirmed the agency's practice with this provision.</p> <p>During interviews with staff, staff indicated they would take action immediately by notifying the superintendent, security staff, captains, supervisor or any administrator and documents what was reported. Some staff indicated they would move inmate to a different barrack or separate inmate from population.</p> <p>Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.63	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that within 72 hours of receiving an allegation that an offender was the victim of sexual abuse while confined at another facility, the information shall be reported to the head of the facility where the alleged abuse occurred (a, b). All notifications shall be documented and the appointing authority that receives such notification shall ensure that the allegation is investigated (c, d).</p> <p>During staff interviews, SCCC did not have any allegations of sexual abuse or sexual harassment to report to another confinement facility that would confirm the facilities practice with this provision (a, b, c, d). However, if SCCC did receive an allegation the security director and the Warden would assign investigator and follow PREA protocols.</p> <p>Post audit, the facility did provide two administrative investigations for the auditor review. In review the investigations, both allegations originated from SCCC and not another confinement facility that would confirm the agency's practice with provision (a-d).</p> <p>Based on the evidence, the facility is in compliance with this standard.</p>

<b>115.64</b>	<b>Staff first responder duties</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1481 913">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that upon learning of an allegation that an offender was sexually abused, the first security staff member to respond to the report shall be required to, at a minimum separate the alleged victim and abuser; preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; if the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking or eating; and if the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking or eating (a). If the first responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and then notify security staff (b).</p> <p data-bbox="252 969 1469 1346">During interviews, staff reported that there was no reported allegation of sexual abuse to which security staff member was able to protect the crime scene or request the alleged victim to take actions not to destroy physical evidence the would confirm the agency’s practice with this provision (a, b). However, staff knew what action they would take in learning that an inmate was sexually abused. Staff indicated they would notify their supervisor, call medical, keep the inmate safe and away from alleged abuser, reassure the victim, keep them calm, ensure the alleged victim did not drink water, brush teeth, wash their hands, bath, use the toilet where physical evidence could be lost, secure any evidence and document what was reported to them.</p> <p data-bbox="252 1402 1485 1603">However, post audit the facility reported an allegation of sexual abuse. The auditor was not able to interview the inmates involved in this allegation. In review of the investigative report, first responder reported the allegation as required, separated the alleged victim from the alleged abuser, and took appropriate steps to collect evidence that would confirm the agency's practice with provision (a,b).</p> <p data-bbox="252 1659 1158 1693">Based on the evidence, the facility is in compliance with this standard.</p>

<b>115.65</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that each facility shall develop a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among employee first responders, medical and mental health practitioners, investigators and facility leadership. (a).</p> <p>During an interview with staff, staff stated that the facility does have a written plan at SCCC to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators and facility leadership (a).</p> <p>The auditor was able to review the PREA notification plan for St. Croix Correctional Center Sexual Abuse Response Team Protocol. The plan details the response plan for a reported risk of imminent sexual abuse, a suspected or alleged facility-based incident of sexual abuse, and a report of sexual abuse at another confinement facility. The plan details the individual responses for the Superintendent, Captain, non-uniformed staff, sergeant, compliance manager, medical staff, victim services coordinator, investigator, appointing authority, sexual abuse incident review team, , staff first responder (a).</p> <p>Based on the evidence, the facility is in compliance with this standard.</p>

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

115.67	<b>Agency protection against retaliation</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1481 786">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that each facility shall designate an employee(s) to monitor retaliation to ensure that all offenders and employees involved in the reporting or investigation of sexual abuse and/or sexual harassment are protected (a). For at least 90 days following a report of sexual abuse, the designated facility-based employee(s) shall monitor the conduct and treatment of the offender(s) or employee(s) who reported the sexual abuse and the offender(s) who were reported to have experienced sexual abuse to determine if retaliation occurred. For offenders, such monitoring shall include periodic status checks. Employees shall act promptly to remedy any such retaliation. Monitoring beyond 90 days shall continue if the initial monitoring indicates a continuing need (c, d). For offenders or employees who express fear of retaliation, the facility shall take appropriate protective measures (b, e).</p> <p data-bbox="252 842 1481 1301">During the on site audit and interview with staff, the facility reported that there are three staff (Superintendent/PCM and two Captains) that monitor retaliation (a). Staff indicated that they would would monitor for 90 days and review cameras, movement, talk to staff and inmates to look for possible retaliation. They would investigate what is being reported and be very observant and follow up. Staff indicated that they have a lot of resources such as the hotline, medical, AODA counselor and pastoral visits to meet the needs of the inmates. The facility indicated they have a number of measures they could take to protect the victim. Staff indicated they could transfer the alleged suspect to another facility, reassignment of staff, administrative leave, and periodic status checks with the inmate victim. Staff indicated that they want to ensure the inmate is not adversely impacted by that staff. Therefore they would move the staff (b, c, d,e).</p> <p data-bbox="252 1357 1465 1435">The facility reported that they did not have any allegations of sexual abuse that could confirm the facility's practice with this provision (a, b, c, d, e).</p> <p data-bbox="252 1491 1449 1693">Post audit the facility did conduct retaliation monitoring for two inmates that reported sexual abuse, sexual harassment and retaliation. The facility provided a copy of the investigation to the auditor for review. A review of the investigative reports confirmed the agency did assign monitors and followed up with inmates. Housing assignment changes were employed to protect the victim that would confirm the agency's practice with provision (a, b, c, d, e).</p> <p data-bbox="252 1749 1469 1951">The facility provided DOC 2805 Sexual Abuse Allegation staff retaliation monitoring, DOC 2767 Sexual Abuse and Sexual Harassment Victim services coordinator response checklist that would document monitoring with victim and the staff member for 90 days. The facility has designated three staff that conduct retaliation monitoring for inmates (Superintendent (PREA Compliance Manager), or designee, Captain and Victim Services Coordinator (a).</p> <p data-bbox="252 2007 1158 2040">Based on the evidence, the facility is in compliance with this standard.</p>

<b>115.68</b>	<b>Post-allegation protective custody</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1481 450">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that any use of restricted status housing to protect an offender who is alleged to have suffered sexual abuse shall be subject to the requirements of placement 115.43 (a).</p> <p data-bbox="252 495 1474 618">During interview with staff, staff indicated that they did have a policy ED 16A section 5B ED 72 Sexual Abuse and Sexual Harassment in confinement XV Section A. Staff indicated that they would not place them in segregated housing and SCCC does not have segregation housing.</p> <p data-bbox="252 663 1453 786">During the last 12 months SCCC did not any inmate who alleged to have suffered sexual abuse held in involuntary segregated housing awaiting completion of assessment that would confirm the agency's practice with this provision (a).</p> <p data-bbox="252 831 1406 909">During the tour of the facility, the auditor was able to confirm that SCCC does not have a segregated housing unit.</p> <p data-bbox="252 965 1158 999">Based on the evidence, the facility is in compliance with this standard.</p>

115.71	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the DOC shall ensure that an investigation is completed for all allegations of sexual abuse and sexual harassment, including those received from third-parties and anonymous sources. DOC shall maintain a policies that governs the conduct of such investigation (a). Allegations of sexual abuse or sexual harassment that involve potentially criminal behavior shall be referred for investigation to local law enforcement. All referrals to law enforcement shall be documented. The policy describing such referrals, in addition to the investigative responsibilities of the DOC and local law enforcement, shall be published and maintained on the DOC's website (h). Investigators shall preserve and/or collect direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator(c). The credibility of an alleged victim, suspect or witness shall be assessed on an individual basis and shall not be determined by the person's status as offender or employee. The DOC shall not require an offender who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation (e). Administrative investigations shall include an effort to determine whether employee actions or failures to act contributed to the abuse (f). Administrative and criminal investigations shall be documented in a written report to be retained for as long as the alleged abuser is incarcerated or employed by the DOC, plus ten years. Administrative investigative reports shall include a description of the physical and testimonial evidence, the reasoning behind credibility assessments and the investigative facts and findings (f,i). The departure of an alleged abuser or victim from the employment or control of the facility or the DOC, or the recantation of the allegation, shall not provide a basis for terminating an investigation (j).</p> <p>The agency is not responsible for conducting criminal sexual abuse allegations. However, the agency does conduct administrative sexual abuse allegations which is documented on a DOC 1271 report. The Criminal sexual abuse allegations are referred to the local law enforcement for investigation. Both agencies have a good working relationship. The outside agency would work directly with Wisconsin Corrections Center System Security Director (WCCS) (a). At the time on the onsite audit, the PREA investigator had retired and teh agency had just hired a new PREA investigator. The PC and the Security Director reported that if there was an allegation of sexual abuse or sexual harassment the allegation would be forwarded through the same process but assigned to another investigator within the agency. A review of training records database and confirmed that 317 staff were trained to conduct PREA investigations within the agency and 34 were trained to conduct PREA investigations within the WCCS consistent with provision (b). SCCC has one trained PREA investigator that completed specialized PREA investigator training.</p> <p>During the onsite audit, the agency reported that SCCC did not have any reported sexual abuse allegations preceding the onsite audit. Therefore, the auditor was not able to review any investigative files during the onsite audit. SCCC did have two sexual abuse/sexual</p>

harassment investigations post audit that was investigated to confirm the agency's practice with this provision. There was one grievance of sexual harassment during the time on the onsite audit and there was one sexual abuse/harassment investigation post audit. The auditor requested that the facility send the completed investigations for review. The auditor was able to review the investigations to confirmed the agency's practice. During an interview with the Security Director and PC, they were able to describe the investigative process. During the investigative process, facility staff have been instructed to notify the supervisor of any allegation of sexual abuse or sexual harassment, a supervisor would complete a preliminary investigation then forward it to the Security Director (WCCS). The Security Director (WCCS) will then work with human resource on assignment of an investigator then forward to PREA Office to assign an investigation number. After the investigation number has been assigned, the investigation is sent o the PREA investigator within 48 hours to investigate the allegation.

During interviews with inmates, there was one allegation of sexual harassment reported through the grievance process. Facility staff confirmed that they had received the allegation and had processed the allegation for investigation. The auditor requested that the investigation be provided when it was completed and that the inmate be monitored a result of the allegation.

Post audit, the auditor requested that the facility provide the grievance investigation that was reported during the onsite audit and any other investigations that were completed post audit. The agency provided two investigations that confirmed the agency's practice with provision (c-f ). The investigations were in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence that confirms the agency practice with provision (g, h, j). The agency also provided three documented reports from 2007 to confirm that the agency maintain all investigations. The investigations are maintained by WCCS (i).

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

115.72	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the DOC shall impose no standard higher than a preponderance of the evidence in determining whether the allegations of sexual abuse or sexual harassment are substantiated (a).</p> <p>During the onsite audit, the agency reported that SCCC did not have any reported sexual abuse allegations preceding the onsite audit. Therefore, the auditor was not able to review any investigative files during the onsite audit. SCCC did have two sexual abuse/sexual harassment investigations post audit that was investigated to confirm the agency's practice with this provision. There was one grievance of sexual harassment during the time on the onsite audit and there was one sexual abuse/harassment investigation post audit. The auditor requested that the facility send the completed investigations for review. Post audit, the facility provided the auditor two administrative investigations for review. A review of the reported sexual abuse or sexual harassment investigations during the last 12 months confirm's the agency's compliance with this provision (a). The auditor was able to review the investigations to confirmed the agency's practice.</p> <p>During an interview with the Security Director, the standard of evidence they require to substantiate allegations of sexual abuse or sexual harassment is more likely than not. In both investigations, the investigator found the allegations to be substantiated based on the evidence which confirmed the agency's practice with this provision.</p> <p>Based on the evidence, the facility has demonstrated compliance with the standard.</p>

115.73	<p><b>Reporting to inmates</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that following an investigation of an allegation that an offender suffered sexual abuse in a DOC facility, the facility shall inform the alleged victim, and document such notification, as to whether the allegation has been determined to be substantiated, unsubstantiated or unfounded. If the DOC did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the alleged victim. The DOC's obligation to report shall terminate if the alleged victim is released from custody (a, b, e, f).</p> <p>During interview with staff, the facility reported that they have not had any sexual abuse or sexual harassment administrative or criminal investigations during the last 12 months that would confirm the agency's compliance with this provision.</p> <p>A review of agency letters DOC 2768 confirm that the agency has a process for notification of findings for substantiated, unsubstantiated, and unfounded cases.</p> <p>During interviews with inmates, there was one allegation of sexual harassment reported through the grievance process. Facility staff confirmed that they had received the allegation and had processed the allegation for investigation. The auditor requested that the investigation be provided when it was completed and that the inmate be monitored a result of the allegation.</p> <p>Post audit, the facility provided the auditor two administrative investigations for review. A review of the reported sexual abuse or sexual harassment investigations the inmate was being monitored and was notified of the outcome of the investigation which confirm's the agency's compliance with this provision.</p> <p>Based on the evidence, the facility has demonstrated compliance with the standard.</p>
--------	---

<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines staff members who are found to have violated the DOC sexual abuse, sexual harassment and retaliation policies shall be subject to disciplinary sanctions up to and including termination (a). Termination is the presumptive sanction for a staff member who engaged in sexual abuse. All terminations for violations of the DOC sexual abuse and sexual harassment policies, including resignations that would have resulted in termination if not for the resignation, shall be reported to any relevant licensing bodies (b)(d). Sanctions shall be commensurate with the nature and circumstances of the violation, the staff member's disciplinary history and the sanctions imposed for comparable offenses by other staff with similar histories (c).</p> <p>A review of facility investigation during the audit period verified that there was one substantiated case involving staff sexual harassment wherein the staff was disciplined in accordance with the agency policy (b,c). There were no termination for violation of the agency sexual abuse or sexual harassment policy during the audit period (d).</p> <p>Based on the evidence, the facility has demonstrated compliance with the standard.</p>

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

115.78	<b>Disciplinary sanctions for inmates</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1481 1043">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that Offenders who have committed offender-on-offender sexual abuse are subject to disciplinary sanctions pursuant to a formal disciplinary process (a). Sanctions shall be commensurate with the nature and circumstances of the violation, the offender’s disciplinary history and the sanctions imposed for comparable offenses by other offenders with similar histories (b). The disciplinary process shall consider whether a perpetrating offender’s mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed (c). The facility shall consider requiring perpetrating offenders to participate in interventions, such as therapy or counseling, to address and correct underlying reasons or motivations for the abuse (d). An offender may only be disciplined for sexual contact with an employee upon a finding that the employee did not consent to such contact (e). Reports of sexual abuse or sexual harassment made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence to substantiate the allegation (f). While consensual sexual activity between offenders is prohibited in the DOC facilities, the DOC may not deem consensual sexual activities as sexual abuse if it is determined that the activity is not coerced (g).</p> <p data-bbox="252 1099 1455 1391">During interviews with staff, the facility did not have an administrative findings of inmate-on-inmate sexual abuse that have occurred at the facility in the last 12 months (a). Although the agency prohibits sexual activity between offenders, non-coercive sexual activity between inmates is not considered sexual abuse (g). Also, an inmate may be disciplined for sexual contact with an employee upon a finding that an employee did not consent to the sexual contact with the inmate (e). There had been no instance of an inmate sexual contact on an employee to confirm the agency's practice with this provision (e).</p> <p data-bbox="252 1447 1481 1738">An investigation reviewed post audit during the audit period revealed SCCC had one administrative findings of inmate-on-inmate sexual abuse that have occurred at the facility that was substantiated and the inmate was disciplined as a result which confirmed the agency's practice with provision (a,b,c). SCCC did not have any administrative finding that resulted in criminal finding of guilt to confirm the agency’s practice with this provision (a). The auditor did receive a copy of the investigation for review. The auditor was not able to interview the victim in this offense as the incident occurred post audit.</p> <p data-bbox="252 1783 1334 1816">Based on the evidence, the facility has demonstrated compliance with the standard</p>

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

115.82	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that all medical and mental health treatment services shall be provided to the victim without financial cost, regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident, and in a manner consistent with the community level of care (c)(d).</p> <p>SCCC reported that they would use a DOC -3001 Off site service request to report if a inmate was to go off site for treatment. SCCC staff reported that there was no incident of a sexual abuse allegation in the last 12 months that would confirm the agency's practice with this provision (a).</p> <p>During interview, staff indicated that victims would have timely and unimpeded access to emergency medical treatment. Services would be provided based on the information provided by alleged victim. If medical indicated a medical assessment is required, administration would ensure it happened (a, b). The alleged victim would be taken to Westfield Hospital and Clinic ER and Turning Point. Also, the facility provides St.Croix Valley Sexual Assault Response Team (SART) Inc. as an additional outside resource (c). Staff indicated that inmates that are victims of sexual abuse are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis (c).</p> <p>Post audit, the facility provided the auditor one investigation of an inmate and inmate allegation of sexual abuse. A review of the investigation confirmed that the agency did offer additional support services to the victim which confirmed the agency's practice with provision (d).</p> <p>Based on the evidence, the facility has demonstrated compliance with the standard.</p>

115.83	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<p data-bbox="252 168 901 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 246 526 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 1476 952">Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines the facility shall offer medical and mental health evaluation and, as appropriate, treatment to all offenders who have been victimized by sexual abuse in any confinement setting. The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities or their release from custody (a,b). All medical and mental health treatment services shall be provided to the victim without financial cost, regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident, and in a manner consistent with the community level of care (g)(c). Victims of sexual abuse shall be offered tests for sexually transmitted infections. Victims of sexually abusive vaginal penetration shall be offered pregnancy tests, in addition to timely and comprehensive information about and timely access to lawful pregnancy-related medical services(d-f). Facilities shall attempt to conduct a mental health evaluation of all known offender-on offender abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners (h).</p> <p data-bbox="252 1008 1476 1556">During staff interviews, SCCC staff reported that there has not been an incident of sexual abuse in the last 12 months to evaluate the facility compliance with this standard. However,staff indicated that if an inmate alleged to have been sexually abused at SCCC, Turning Point would be first contact for treatment. There is no onsite mental health for sexual abuse treatment. However, medical could be handled here for physical trauma after stabilized at ER. Staff indicated although they are not therapist, they would do stress management, anxiety management within the scope of providing a safe place to listen to the victim. Staff indicated that services offered are consistent with community level of care without financial cost (c, g). Since SCCC has female inmates, female inmates would immediately be given timely information and access to all lawful pregnancy related services and testing (d-f). SCCC HSU can do a basic psychological assessments. However, does not conduct mental health evaluations. Mental health evaluations are completed prior to inmates being placed into the SCCC program (h).</p> <p data-bbox="252 1612 1476 1691">During interviews with inmates, there were no female inmates that reported sexual abuse at SCCC that would confirm the agency's practice with provision (d-f).</p> <p data-bbox="252 1736 1340 1769">Based on the evidence, the facility has demonstrated compliance with the standard.</p>

115.86	<b>Sexual abuse incident reviews</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1481 1088">The agency's Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) Policy outlines that all facilities shall conduct a review within 30 days of the conclusion of every sexual abuse investigation unless the allegation was determined to be unfounded. The team shall consist of upper level management officials with input from supervisors, investigators and medical and mental health practitioners (a)(b)(c). Agency's policy also consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect or respond to sexual abuse; consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender or intersex identification, status or perceived status; gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by employees; and prepare a report of its findings, including but not necessarily limited to determinations made in the above items, and any recommendations for improvement and submit such report to the facility head and PREA Compliance Manager (d). Also, the agency policy outlines that the facility shall implement the recommendations for improvement, or shall document its reasons for not doing so (e).</p> <p data-bbox="252 1137 1481 1346">During an interview with staff, staff revealed that there had not been a reported incident or an allegation of sexual abuse that the agency would have investigated that would render a sexual abuse incident review. However, staff indicated that if they did have an sexual abuse incident they would follow the agency policy (a)(b)(c)(d)(e). Staff stated the incident review team is made up of the superintendent and two Captains.</p> <p data-bbox="252 1395 1481 1473">During interviews with random inmate, none of the inmate stated that they reported or know of a sexual abuse allegation during the last twelve months.</p> <p data-bbox="252 1523 1426 1686">During the post audit the facility received an allegation of sexual abuse and sexual harassment that was investigated and concluded a sufficient evidence finding. The auditor requested and was provided a copy of the investigation for review. A review of the investigation confirmed the agency's practice with this provision.</p> <p data-bbox="252 1736 1102 1769">Based on the evidence, the facility is compliant with this standard.</p>

115.87	<b>Data collection</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1469 703">Agency Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) policy outlines that the DOC shall collect accurate, uniform data from incident-based documents such as reports, investigation files and sexual abuse incident reviews for every allegation of sexual abuse within facilities, including facilities with which it contracts for the confinement of offenders, using a standardized instrument and set of definitions. The extracted data, at minimum, shall include the information to answer all questions from the most recent version of the Department of Justice Survey of Sexual Victimization. This data shall be aggregated annually, reported to the Department of Justice as requested and, with personal identifiers removed, posted publicly to the DOC's website annually (a)(b)(c)(d)(e)(f).</p> <p data-bbox="252 757 1469 1088">A review of the agency website (<a href="https://doc.wi.gov/Pages/AboutDOC/PrisonRapeEliminationAct.aspx">https://doc.wi.gov/Pages/AboutDOC/PrisonRapeEliminationAct.aspx</a>) reveal that the the Wisconsin Department of Corrections collects and aggregates incident-based sexual abuse data. After analyzing such data, DOC posts an annual compilation of findings and corrective actions on its website. The agency currently has 2010, 2011, 2012, 2013, 2014, and 2015 on its website (a). The agency does not contract for the confinement of its inmates. Therefore, there is no incident based and aggregated data to review for provision (e). The agency would provide the Department of Justice (DOJ) all data upon request (f).</p> <p data-bbox="252 1142 1469 1473">An interview with the agency's PREA Coordinator, the agency reported that they have a layered approach. The agency collect data from the facilities, aggregate that data, respond, compile years, identify problems areas and things that can be corrected and this information is reflected in their annual report. If requested, they would provide the DOJ with all data from their annual report. The agency stated that they do not place suspect and victim information in their annual reports. All personal identifying information is removed prior to placing on the website. The facility reported that they had no sexual abuse investigations during the last 12 months.</p> <p data-bbox="252 1527 1342 1561">Based on the evidence, the facility has demonstrated compliance with this standard.</p>

115.88	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Agency Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that the agency shall collect accurate, uniform data from incident-based documents such as reports, investigation files and sexual abuse incident reviews for every allegation of sexual abuse within facilities, including facilities with which it contracts for the confinement of offenders, using a standardized instrument and set of definitions. The extracted data, at minimum, shall include the information to answer all questions from the most recent version of the Department of Justice Survey of Sexual Victimization. This data shall be aggregated annually, reported to the Department of Justice as requested and, with personal identifiers removed, posted publicly to the DOC's website annually (a,b,c,d).</p> <p>In review of the agency website, the Wisconsin Department of Corrections has verified that the agency prepares annual report of the findings from its data review and corrective action plan for each facility as well as for the agency. The agency's prior year reports are also available on the website and detail collected data from 2010 to 2015. The annual reports does assess the agency progress in addressing sexual abuse. It was verified that the agency prepares annual report of the findings from its data review and corrective action plan for each facility as well as for the agency on the agency website (a,b,c,d).</p> <p>During an interview with staff, the agency after every incident the agency does an after action on it. The incident review team (Investigators, health team, victim services coordinator) will review sexual abuse substantiated or unsubstantiated incidents and look at all factors. The agency looks at the policy, camera placement, staffing levels, and physical plant modifications in the area. This data is compiled by the PREA office (a). The agency prepares an annual report of findings from its data review and any corrective actions for each facility as well as the agency (b). The Secretary Office approves the annual reports and the reports made available to the public on the agency's website (c). The agency reported that they do not redact information from the annual report (d).</p> <p>Based on the evidence, the facility has demonstrated compliance with this standard.</p>

<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<p data-bbox="247 168 901 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="247 246 526 280"><b>Auditor Discussion</b></p> <p data-bbox="247 324 1468 526">Agency Executive Directive 72 Sexual Abuse and Sexual Harassment in Confinement (PREA) outlines that All data shall be securely retained and maintained for at least 10 years after the date of initial collection (a,d). This data shall be aggregated annually, reported to the Department of Justice as requested and, with personal identifiers removed, posted publicly to the DOC's website annually (b,c).</p> <p data-bbox="247 582 1484 739">During an interview with the Agency PREA Coodinator, it was verified that the agency does not put suspect or victim information in there annual reports. The agency removes all personal identifying information prior to placing it on the website (c). The data collected is kept confidential and is securely retained by the agency PREA Coordinator (a)(c).</p> <p data-bbox="247 795 1476 952">A review of the agency website, Prisoner Rape Elimination Act (PREA annual reports for 2014 and 2015 did not reveal any personal identifiers. The agency did not use names, inmate numbers that would disclose the victim or suspects identity. The reports from 2010, 2011, 2012, 2013, 2014, 2015 are available for the public to review (b)(c)(d).</p> <p data-bbox="247 1008 1348 1041">Based on the evidence, the facility has demonstrated compliance with this standard.</p>

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<p data-bbox="247 1243 901 1276"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="247 1321 526 1355"><b>Auditor Discussion</b></p> <p data-bbox="247 1400 1484 2038">In review of the agency website, the agency list all Prison Rape Elimination Act (PREA) audits for each of the facilities that is operates. All facilities were audited at least once (a)(b).The facility PCM did provide the auditor full access to all areas within the facility (h). The auditor received documentation pre-audit and was able to request additional documents onsite and post audit. At the exit meeting during the onsite audit, the auditor made recommendations and the facility acknowledged the recommendations and provided the documentation to support the action taken by the facility (i).The auditor was able to conduct private interviews with 16 inmates during the on site audit (m). The auditor sent the audit notice to post throughout the facility on July 5, 2017. The facility verified that the notice was posted on July 5, 2017 and during the onsite tour the auditor observed the auditors notice in every area that inmates had access. The auditors notice provided inmates the ability to send correspondence to the auditor in the same manner as if they were communicating with legal counsel. The auditor did not receive correspondence from any inmate at St. Croix Correctional Center pre-audit or post audit. However, during interviews inmates verified that they knew of the auditors notice and knew that they could write the auditor (m)(n).</p> <p data-bbox="247 2083 1348 2116">Based on the evidence, the facility has demonstrated compliance with this standard.</p>

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

## Appendix: Provision Findings

115.11 (a)	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	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)	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	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)	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	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)	<b>Contracting with other entities for the confinement of inmates</b>	
	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)	<b>Contracting with other entities for the confinement of inmates</b>	
	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)	<b>Supervision and monitoring</b>	
	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

<b>115.13 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	yes

<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes

115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

115.14 (a)	Youthful inmates	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na

115.14 (b)	Youthful inmates	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na

115.14 (c)	Youthful inmates	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na

115.15 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes

115.15 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates in non-exigent circumstances? (N/A here for facilities with less than 50 inmates before August 20,2017.)	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)	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility implement a policy and practice that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes

115.15 (e)	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes

115.15 (f)	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

115.16 (a)	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	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)	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who 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)	<b>Hiring and promotion decisions</b>	
	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

<b>115.17 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes

<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes

<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	yes

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

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

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

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

115.21 (d)	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes

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

115.21 (f)	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating 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)	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.21(d) above.)	yes

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

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

115.22 (c)	<b>Policies to ensure referrals of allegations for investigations</b>	
	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)	<b>Employee training</b>	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes

115.31 (b)	<b>Employee training</b>	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes

115.31 (c)	<b>Employee training</b>	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes

115.31 (d)	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes

115.32 (a)	<b>Volunteer and contractor training</b>	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes

115.32 (b)	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes

<b>115.32 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes

<b>115.33 (a)</b>	<b>Inmate education</b>	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes

<b>115.33 (b)</b>	<b>Inmate education</b>	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes

<b>115.33 (c)</b>	<b>Inmate education</b>	
	Have all inmates received 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)	<b>Specialized training: Investigations</b>	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and 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)	<b>Specialized training: Investigations</b>	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

115.35 (a)	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment?	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

<b>115.35 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams.)	na

<b>115.35 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere?	yes

<b>115.35 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31?	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

<b>115.41 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes

<b>115.41 (b)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes

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

<b>115.41 (i)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates?	yes

<b>115.42 (a)</b>	<b>Use of screening information</b>	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes

<b>115.42 (b)</b>	<b>Use of screening information</b>	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes

115.42 (c)	Use of screening information	
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems?	yes

115.42 (d)	Use of screening information	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes

115.42 (e)	Use of screening information	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes

115.42 (f)	Use of screening information	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes

115.42 (g)	Use of screening information	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status?	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status?	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status?	yes

115.43 (a)	Protective Custody	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes

115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The opportunities that have been limited?	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The duration of the limitation?	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The reasons for such limitations?	yes

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

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

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

115.51 (a)	Inmate reporting	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	no
	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?	no
	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?	no

115.51 (b)	Inmate reporting	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security?	yes

115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes

115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes

115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes

115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes

115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes

115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes

115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes

115.52 (f)	<b>Exhaustion of administrative remedies</b>	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes

115.52 (g)	<b>Exhaustion of administrative remedies</b>	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes

115.53 (a)	<b>Inmate access to outside confidential support services</b>	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, 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)	<b>Inmate access to outside confidential support services</b>	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes

115.53 (c)	<b>Inmate access to outside confidential support services</b>	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes

115.54 (a)	<b>Third-party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes

115.61 (a)	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes

115.61 (b)	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes

115.61 (c)	<b>Staff and agency reporting duties</b>	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes

115.61 (d)	<b>Staff and agency reporting duties</b>	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes

<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes

<b>115.62 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes

<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes

<b>115.63 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes

<b>115.63 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes

<b>115.63 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes

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

<b>115.66 (a)</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no

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

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

115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes

115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes

<b>115.67 (e)</b>	<b>Agency protection against retaliation</b>	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes

<b>115.68 (a)</b>	<b>Post-allegation protective custody</b>	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes

<b>115.71 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	When the agency conducts its own investigations into allegations 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

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

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

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

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

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

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

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

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

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

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

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

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

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

115.73 (c)	Reporting to inmates	
	Following a inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following a inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following a inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following a inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes

115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes

<b>115.73 (e)</b>	<b>Reporting to inmates</b>	
	Does the agency document all such notifications or attempted notifications?	yes

<b>115.76 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes

<b>115.76 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes

<b>115.76 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes

<b>115.76 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes

115.77 (a)	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes

115.77 (b)	<b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes

115.78 (a)	<b>Disciplinary sanctions for inmates</b>	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes

115.78 (b)	<b>Disciplinary sanctions for inmates</b>	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes

115.78 (c)	<b>Disciplinary sanctions for inmates</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes

<b>115.78 (d)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes

<b>115.78 (e)</b>	<b>Disciplinary sanctions for inmates</b>	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes

<b>115.78 (f)</b>	<b>Disciplinary sanctions for inmates</b>	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes

<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	Does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes

<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?	yes

115.81 (b)	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes

115.81 (c)	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?	yes

115.81 (d)	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes

115.81 (e)	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes

115.82 (a)	<b>Access to emergency medical and mental health services</b>	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes

115.82 (b)	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes

115.82 (c)	<b>Access to emergency medical and mental health services</b>	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes

115.82 (d)	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes

115.83 (a)	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes

115.83 (b)	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes

<b>115.83 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes

<b>115.83 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.)	yes

<b>115.83 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if all-male facility.)	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

<b>115.88 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes

<b>115.88 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes

<b>115.88 (d)</b>	<b>Data review for corrective action</b>	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes

<b>115.89 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes

<b>115.89 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes

<b>115.89 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes

<b>115.89 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes

<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	During the three-year period starting on August 20, 2013, and during each three-year period thereafter, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once.? (N/A before August 20, 2016.)	yes

<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	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

<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes

<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes

<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes

<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes

<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	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