

# PREA Facility Audit Report: Final

**Name of Facility:** Milwaukee Women's Correctional Center

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** 06/16/2017

**Date Final Report Submitted:** 01/12/2018

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> Steven Cubello	<b>Date of Signature:</b> 01/12/2018

AUDITOR INFORMATION	
<b>Auditor name:</b>	Cubello, Steven
<b>Address:</b>	
<b>Email:</b>	sjcubello@dpscs.state.md.us
<b>Telephone number:</b>	
<b>Start Date of On-Site Audit:</b>	05/10/2017
<b>End Date of On-Site Audit:</b>	05/10/2017

FACILITY INFORMATION	
<b>Facility name:</b>	Milwaukee Women's Correctional Center
<b>Facility physical address:</b>	615 West Keefe Avenue, Milwaukee, Wisconsin - 53212
<b>Facility Phone</b>	414.267.6101
<b>Facility mailing address:</b>	
<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>	Pamela Zank	<b>Title:</b>	Superintendent
<b>Email Address:</b>	Pamela.Zank@wisconsin.gov	<b>Telephone Number:</b>	414.267.6102

Warden/Superintendent			
<b>Name:</b>	Sarah Cooper	<b>Title:</b>	Warden
<b>Email Address:</b>	Sarah.Cooper@wisconsin.gov	<b>Telephone Number:</b>	920.929.3800

Facility PREA Compliance Manager			
<b>Name:</b>	Pam Zank	<b>Email Address:</b>	Pamela.Zank@wisconsin.gov

Facility Health Service Administrator			
<b>Name:</b>	Susan Nygren	<b>Title:</b>	Health Service Unit Manager
<b>Email Address:</b>	Susan.Nygren@wisconsin.gov	<b>Telephone Number:</b>	262.878.6000

Facility Characteristics			
<b>Designed facility capacity:</b>	112		
<b>Current population of facility:</b>	112		
<b>Age Range</b>	Adults: 21-68	Youthful Residents:	
<b>Facility security level/inmate custody levels:</b>	Minimum/ Minimum Community Custody		
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	27		

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

Agency-Wide PREA Coordinator Information			
<b>Name:</b>	Cheryl Frey	<b>Email Address:</b>	cheryl.frey@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.

### Narrative:

The Prison Rape Elimination Act (PREA) on-site audit of Milwaukee Women's Correctional Center (MWCC) was conducted on May 10, 2017, by Steven Cubello (Lead Auditor) and Rose Beteck both from Maryland and are U.S Department of Justice Certified PREA Auditors for Adult Jails and Prisons. This audit was conducted as part of an interstate consortium consisting of Pennsylvania, Maryland, Michigan, and Wisconsin. Audit notices were posted throughout the facility six weeks prior to the onsite review. Leigha Weber, WIDOC PREA Analyst verified by email that the notices were posted, documenting that this procedure occurred timely. To date, the Auditor has received only one letter from this facility.

The audit was conducted using the PREA Online Audit System (PREA OAS) developed by the PREA Resource Center. The MWCC staff was requested to complete the Pre-Audit Questionnaire and it was provided to the auditors along with supporting documents that were uploaded to the PREA OAS in the weeks preceding the on-site review part of the audit. The Pre-Audit preparation by the auditors included a thorough review of all documentation and materials submitted by the facility along with the data included in the completed Pre-Audit Questionnaire. The documentation reviewed included agency policies, procedures, forms, education materials, training curriculum, organizational charts, posters, brochures, and other PREA related materials that were provided to demonstrate compliance with the PREA standards. The review prompted some questions that were asked of the PREA compliance manager during the on-site visit.

On May 10, 2017, both auditors entered MWCC at approximately 1000 hours and an entrance conference occurred shortly thereafter. Present were Pamela Zank, MWCC Superintendent/PREA Compliance Manager; Leigha Weber, WIDOC PREA Program and Policy Analyst; and Randy Miller, Correctional Officer Captain. After the entrance conference, the Auditors split up, conducted the tour and started the formal interviews.

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

During the tour, the auditor considered such things as supervision levels, blinds spots, compliance with

policies, and the overall safety of inmates in this facility. As the tour progressed, the auditor observed the placement of cameras, mirrors, staff supervision, cell layout including showers, bathroom stalls, placement of posters, and other PREA related information. There were no cameras placed unnecessarily that would infringe on inmate privacy. An adequate number of signs had been placed in the facility providing PREA information and the right to be free from sexual abuse and sexual harassment. The washing area allowed inmates to shower separately in stalls with curtains for additional privacy. The bathroom/toilet area is enclosed allowing inmates privacy while still meeting security needs. MWCC has 39 cameras throughout the facility and a tour of the camera room was included in the tour. All of the cameras in the facility could be monitored from this location as well as the Superintendent and Captain's office. The cameras in this facility provide excellent coverage and help keep inmates safe. The need for additional cameras is reviewed annually.

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

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

The Auditors conducted an exit conference during the evening on Wednesday May, 10, 2017. Everyone who attended the entrance conference was present and Sarah Cooper, Wisconsin Women's Correctional System (WWCS) Warden, and Jennifer McDermott WWCS Deputy Warden joined in by telephone.

## 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:

MWCC is located at 615 West Keefe Avenue, Milwaukee, WI 53212. MWCC opened its doors to staff on December 11, 2003 and to inmates on December 29, 2003. Maximum capacity at MWCC is 112 inmates. They house minimum & minimum-community custody inmates. MWCC provides a wide range of services such as alcohol and drug treatment, re-entry, family reintegration, and much more.

MWCC is a single story brick building located on the corner in a residential neighborhood. They have 1 administrative wing and 3 housing wings which are viewable by the central control. There are 39 cameras located in the facility and they are viewable by staff in the central control. The Superintendent and the Captain also have the ability to view those cameras from their office. There is large outdoor recreation area that is monitored by cameras, and a short perimeter fence which separates the facility from the neighbors. The building also includes a dietary area, laundry, visitation room, and a resource room that provides inmates with the resources needed to apply for jobs or obtain a GED.

## 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>	0
<b>Number of standards met:</b>	45
<b>Number of standards not met:</b>	0

### Summary of Audit Findings:

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

115.41: WIDOC is not properly conducting a reassessment of inmates within 30 days of their arrival at the facility.

### Summary of Corrective Action Period:

During the Corrective Action Period, Pamela Zank retired from the WIDOC. Michelle Haese was designated as the MWCC PREA Compliance Manager effective October 1, 2017.

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

Number of Standards Exceeded: 0

Number of Standards Met: 45

• 115.11, 115.12, 115.13, 115.14, 115.15, 115.16, 115.17, 115.18, 115.21, 115.22, 115.31, 115.32, 115.33, 115.34, 115.35, 115.41, 115.42, 115.43, 115.51, 115.52, 115.53, 115.54, 115.61, 115.62, 115.63, 115.64, 115.65, 115.66, 115.67, 115.68, 115.71, 115.72, 115.73, 115.76, 115.77, 115.78, 115.81, 115.82, 115.83, 115.86, 115.87, 115.88, 115.89, 115.401, 115.403

Number of Standards Not Met: 0





**Standards**

**Auditor Overall Determination Definitions**

- 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.

<b>115.11</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA)</li> <li>3. WWCS Organizational Chart</li> <li>4. Interviews with PREA Analyst and Manager</li> </ol> <p>Findings (By Subsection):</p> <p>115.11 (a) Wisconsin Department of Corrections (WIDOC) has a comprehensive policy on sexual abuse and sexual harassment. Executive Directive 72, Sexual Abuse and Sexual Harassment in Confinement (PREA) Section V clearly state that they have a zero tolerance for sexual abuse and sexual harassment in all of its facilities, including those in which they contract with.</p> <p>115.11 (b) WIDOC has designated Patrick Hughes as agency-wide PREA Coordinator. Mr. Hughes has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities.</p> <p>115.11 (c) Milwaukee Women’s Correctional Center (MWCC) has designated Pamela Zank as the facility's PREA Compliance Manager. Ms. Zank reports that she has sufficient time and authority to coordinate the facility’s efforts to comply with the PREA standards.</p>

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>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Signed confinement contracts</li> <li>3. Correspondence with the contract administrator</li> </ol> <p>Findings (By Subsection):</p> <p>115.12 (a) WIDOC contracts with 7 other entities for the confinement of its inmates. All contracts require that the entity adopts and comply's with the PREA standards.</p> <p>115.12 (b) WIDOC states that there are no active monitoring efforts currently in place to ensure that the contractor is complying with the PREA standards.</p> <p>Corrective Action Plan:</p> <p>WIDOC will need to demonstrate to the auditor that the agency is monitoring the contractor to ensure that the contractor is complying with the PREA standards.</p> <p>Corrective Action:</p> <p>During the corrective action period, the WIDOC contacted each of the facilities that they contract with to see if they have had a recent PREA audit. Those contracted facilities that did not have a recent PREA audit were required to fill out a questionnaire describing there compliance with the different standards. For any standard that the contracted facility was not in compliance with, WIDOC required the contracted facility to come up with a corrective action plan to come into compliance with those standards.</p> <p>WIDOC has developed an internal policy and procedures that outlines the monitoring process. They have also created a monitoring report form for the contractor to complete. The WIDOC contract monitor will then evaluate the contractor's responses using the following methods: Observation or facility tour, policy review, document review, and/or interviews.</p> <p>Based on WIDOC's progress and the plan for active monitoring in the future, WIDOC now "meets the standard".</p>

<b>115.13</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. MWCC Facility Staffing Plan (March 2017)</li> <li>3. Interviews with PREA Analyst and Manager</li> <li>4. Rounds Log Books</li> <li>5. PREA Staffing Plan Annual Review Log</li> <li>6. WWCS Facility Procedure # 900.20 39</li> <li>7. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA)</li> </ol> <p>Findings (By Subsection):</p> <p>115.13 (a) The agency has ensured that MWCC has developed a staffing plan on an annual basis and it takes into account the following:</p> <ol style="list-style-type: none"> <li>1. Generally accepted detention and correctional practices;</li> <li>2. Any judicial findings of inadequacy;</li> <li>3. Any findings of inadequacy from Federal investigative agencies;</li> <li>4. Any findings of inadequacy from internal or external oversight bodies;</li> <li>5. All components of the facility's physical plant;</li> <li>6. The composition of the inmate population;</li> <li>7. The number and placement of supervisory staff;</li> <li>8. Institution programs occurring on a particular shift;</li> <li>9. Any applicable State or Local laws, regulations, or standards;</li> <li>10. The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and</li> <li>11. Any other relevant factors.</li> </ol> <p>115.13 (b) MWCC did not have any circumstances where the staffing plan was not complied with. When a situation occurs, they will fill the needed position by using overtime.</p> <p>115.13 (c) On an annual basis, MWCC was able to show documentation that when they consulted with the PREA coordinator they assessed, determined, and documented whether there was a need to make changes to the staffing plan, need for additional cameras or other monitoring technologies, and whether or not they have enough staff to ensure that MWCC can adhere to the staffing plan.</p> <p>115.13 (d) In the MWCC log books, it clearly shows that supervisors are making rounds on all shifts. Interviews conducted with supervisory staff indicated that they make those rounds unannounced. Interviews with line staff confirmed that supervisor's make unannounced rounds on all shifts and they occurred at different times/days so that a pattern is not developed. WWCS facility Procedure # 900.20 39 and Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) both prohibit staff members from alerting or notifying other employees that supervisory rounds are occurring.</p>

Corrective Action: None

115.14	Youthful inmates
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"><li>1. Pre-Audit Questionnaire</li><li>2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) Section XII. C.</li><li>3. Interviews with PREA Analyst and Manager</li><li>4. Letter from the Administrator, Division of Adult Institutions</li><li>5. Inmate Roster</li></ol> <p>Findings (By Subsection):</p> <p>115.14 (a-c) The WIDOC Division of Adult Institutions prohibits youthful offenders from being housed in an Adult Institution. This eliminates any sight, sound, or physical contact between an adult inmate and a youthful offender. All Youthful Offenders are now housed within the Wisconsin Division of Juvenile Corrections. A review of the inmate roster and interviews with the Superintendent of the facility confirmed that they have not housed any youthful inmates at MWCC within the past 12 months.</p> <p>Corrective Action: None</p>

115.15	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) Section X</li> <li>3. Division of Adult Institutions (DAI) Policy # 306.17.02, Searches of Inmates</li> <li>4. Interviews with Staff &amp; Inmates</li> <li>5. Availability of female staff/Staff roster</li> <li>6. Lesson title: Introduction to Body Searches</li> </ol> <p>Findings (By Subsection):</p> <p>115.15 (a) Both Executive Directive 72 &amp; DAI Policy # 306.17.02 prohibit cross-gender strip searches or cross-gender body cavity searches except in exigent circumstances. Interviews with inmates and staff verified that these types of searches have not happened.</p> <p>115.15 (b) Both Executive Directive 72 &amp; DAI Policy # 306.17.02 prohibit cross-gender pat-down searches of female inmates except in exigent circumstances. Interviews with inmates verified that male staff were not conducting pat-down searches. Based on a review of staffing, there was enough female staff available so that the facility did not have to restrict female inmates access to regularly available programming or other out-of-cell opportunities in order to comply with this standard.</p> <p>115.15 (c) Due to the makeup of the staff, the facility has not had to conduct any cross gender strip searches or cross-gender visual body cavity searches in an exigent circumstance. Agency policy (Executive Directive 72) requires that if the need were to occur, the facility would document those searches. Based upon the interviews, staff was aware of this policy and the requirement to document such searches if this type of search was necessary.</p> <p>115.15 (d) MWCC Facility Procedure 900.###.## and Executive Directive establish policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances. MWCC has a specific tone that is broadcast over the loud speaker system to announce the presence of male staff. This was used when the Auditor went on the tour, and it was confirmed through inmate interviews that staff use this system and the inmates know what that tone symbolizes.</p> <p>115.15 (e) Executive Directive 72, states that staff may not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmates genital status is unknown, staff may determine the inmate's genital status through conversations with the inmate, reviewing medical records, or by learning information that was part of a broader medical examination conducted in a private setting by medical personnel. This was confirmed by staff and inmate interviews.</p>

115.15 (f) WIDOC has an extensive lesson plan dealing with body searches. Lesson Title: Introduction to Body Searches goes into great detail on how to conduct pat, strip, body cavity, and body content searches. Staff is trained how to conduct these searches in addition to searches of transgender and intersex inmates, so that they are searched in a professional and respectful manner that is least intrusive as possible but still meets security needs. This training was confirmed by staff interviews.

Corrective Action: None

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



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

Corrective Action: None

<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Evidence Reviewed (Documents, Interviews, Site Review):  <ol style="list-style-type: none"><li>1. Pre-Audit Questionnaire</li><li>2. Interviews with Staff</li><li>3. Tour observations</li><li>4. Previous Auditors PREA Report on MWCC</li></ol> Findings (By Subsection):  115.18 (a&b) MWCC has not substantially expanded or modified its facility, however they are aware that if they do, or if they install or update any video monitoring, they will consider how that technology can be used to enhance the facility's ability to protect inmates from sexual abuse.  Corrective Action: None

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

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

<b>115.31</b>	<b>Employee training</b>
	<p data-bbox="252 170 895 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <hr/> <p data-bbox="252 327 1010 360">Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol data-bbox="252 412 675 533" style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Staff Interviews</li> <li>3. Online PREA Training Module</li> </ol> <p data-bbox="252 584 587 618">Findings (By Subsection):</p> <p data-bbox="252 669 1469 831">115.31 (a) MWCC submitted documentation from their PREA staff training curriculum. New employees receive classroom training in the academy. Staff already at the facility receives PREA training every two years via an online training module. All employees are trained on the following 10 mandated elements:</p> <ol data-bbox="252 842 1477 1429" style="list-style-type: none"> <li>1. WIDOC's zero-tolerance policy for sexual abuse and sexual harassment;</li> <li>2. How to fulfill their responsibilities to prevent, detect, and report sexual abuse and sexual harassment;</li> <li>3. How inmates have the right to be free from sexual abuse and sexual harassment;</li> <li>4. Inmates and employees have the right to be free from retaliation for reporting sexual abuse and sexual harassment;</li> <li>5. The dynamics of sexual abuse and sexual harassment in confinement setting;</li> <li>6. Common reactions of sexual abuse and sexual harassment victims;</li> <li>7. Detecting and responding to signs of threatened and actual sexual abuse;</li> <li>8. How to avoid inappropriate relationships with inmates;</li> <li>9. How to communicate effectively and professionally with inmates, including LBGTQI inmates; and</li> <li>10. How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.</li> </ol> <p data-bbox="252 1485 1390 1559">115.31 (b) All WIDOC employees receive training for dealing with both female and male inmates.</p> <p data-bbox="252 1615 1437 1688">115.31 (c) MWCC was able to show that all employees at their facility have been trained on PREA. In years where training is not mandatory, staff receive refresher information.</p> <p data-bbox="252 1744 1469 1861">115.31 (d) WIDOC's online PREA training module requires that staff receive an 80% or higher grade in order to pass the course. Individuals, who fail the test, are able to review the video again and retake the exam. This is logged into the computer system.</p> <p data-bbox="252 1917 560 1951">Corrective Action: None</p>

<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Interview with Volunteer</li> <li>3. Training Documentation</li> <li>4. PREA Guide for Volunteers and Contractors Pamphlet</li> </ol> <p>Findings (By Subsection):</p> <p>115.32 (a) WIDOC Policy requires each volunteer and contractor, who has contact with inmates, to be trained on their responsibilities related to the agency’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures. MWCC reports that 88 volunteer and contractors have been trained for PREA.</p> <p>115.32 (b) MWCC requires all volunteers and contractors who have contact with inmates to go through an orientation class that includes PREA training.</p> <p>115.32 (c) MWCC requires all volunteers and contractors to sign an acknowledgment stating that they have received and understood the training.</p> <p>Corrective Action: None</p>

<b>115.33</b>	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Interviews with Intake Staff, Inmate Training Staff, and Inmates</li> <li>3. Sexual Abuse and Sexual Harassment Prevention and Intervention Handbook</li> <li>4. Inmate PREA Video</li> <li>5. Tour Observations</li> </ol> <p>Findings (By Subsection):</p> <p>115.33 (a) MWCC inmates receive information explaining the agency’s zero-tolerance policy regarding sexual abuse and sexual harassment during the intake process. They are also given information on how to report incidents or suspicions of sexual abuse. Inmates are told about these policies and are given a Sexual Abuse and Sexual Harassment Prevention and Intervention handbook during intake.</p> <p>115.33 (b) MWCC provides a more comprehensive education on their rights to be free from sexual abuse and sexual harassment. MWCC has a video, recorded in both English and Spanish, that the inmates are required to watch.</p> <p>115.33 (c) There were no inmates found who had not been trained on the PREA standards at MWCC. Also, Agency Policy Executive Directive 72 requires that all inmates receive PREA education upon transfer to a different facility.</p> <p>115.33 (d) The agency and MWCC provide education in multiple formats to all inmates including those who are Limited English Proficient, deaf, visually impaired, or otherwise disabled. Some examples included audio for visually impaired individuals and Spanish signs/videos for those who are limited English proficient. Finally, the agency has a language interpretation line and during interviews staff said they would use that, if needed, to help ensure those inmates who are Limited English Proficient received the proper PREA training.</p> <p>115.33 (e) MWCC maintains a training log that inmates sign in order to document that they have received PREA education.</p> <p>115.33 (f) MWCC had posters throughout the facility related to PREA and also had the PREA Sexual Abuse and Sexual Harassment Prevention and Intervention Handbook readily available for inmates.</p> <p>Corrective Action: None</p>

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) Section XI</li> <li>3. Training Curriculum</li> <li>4. Training Power point Slides</li> <li>5. Interviews with Investigatory Staff</li> </ol> <p>Findings (By Subsection):</p> <p>115.34 (a) All WIDOC Investigatory Staff receive the training that is required in § 115.31. Investigatory Staff received extensive training in Madison, Wisconsin at the Central Office related to conducting PREA investigations in a confinement setting.</p> <p>115.34 (b) The auditor reviewed the training curriculum and based off of interviews, it appears that the investigative staff was properly trained in interviewing sexual abuse victims. They were able to explain when to use Miranda and Garrity warnings. The training also included evidence collection.</p> <p>115.34 (c) WIDOC has 253 trained investigators and each individual training is maintained in a database.</p> <p>Corrective Action: None</p>



115.35	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Training Curriculum</li> <li>3. PREA Training Computer Module</li> <li>4. Interviews with Medical and Mental Health Care Staff</li> </ol> <p>Findings (By Subsection):</p> <p>115.35 (a) WIDOC has trained all Medical and Mental Health Care Practitioners on the following 4 mandated elements:</p> <ol style="list-style-type: none"> <li>1. How to detect and assess signs of sexual abuse and sexual harassment;</li> <li>2. How to preserve evidence;</li> <li>3. How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and</li> <li>4. How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.</li> </ol> <p>115.35 (b) This substandard is N/A. All inmates requiring forensic medical examinations are sent to the hospital where the examination is performed by either a SAFE/SANE nurse.</p> <p>115.35 (c) WIDOC has trained 7 Medical and Mental Health Care workers at MWCC. The training is documented on a training log.</p> <p>115.35 (d) ALL employees having contact with inmates, including Medical and Mental Health Care workers, receive the training required under § 115.31. Documentation of the training received is maintained at MWCC and can be found on the training log.</p> <p>Corrective Action: None</p>

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Interviews with Staff and Inmates</li> <li>3. PREA Screening Tool</li> <li>4. Inmate Roster</li> <li>5. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA) Section XII</li> </ol> <p>Findings (By Subsection):</p> <p>115.41 (a) WIDOC Executive Directive 72 Section XII requires all inmates to be assessed during intake and upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates.</p> <p>115.41 (b) WIDOC Executive Directive 72 Section XII requires all intake screenings to take place within 72 hours of arrival. Based on a sample of intakes, MWCC meets that requirement and usually conducts the screening the same day.</p> <p>115.41 (c) MWCC uses an objective screening instrument to assess inmates of their risk of being sexually abused by others or being sexually abusive toward other inmates.</p> <p>115.41 (d) MWCC uses an objective screening instrument that uses the following criteria to assess the inmates risk of sexual victimizations:</p> <ol style="list-style-type: none"> <li>1. Whether the inmate has a mental, physical, or developmental disability;</li> <li>2. Age of the inmate;</li> <li>3. Physical build of the inmate;</li> <li>4. Prior incarceration status;</li> <li>5. Whether prior incarceration status is exclusively nonviolent;</li> <li>6. Prior convictions for sex offenses;</li> <li>7. Whether the inmate is LGBTI, or gender nonconforming;</li> <li>8. Experienced prior sexual victimization;</li> <li>9. Inmates own perception and vulnerability; and</li> <li>10. Whether the inmate is detained solely for civil immigration purposes.</li> </ol> <p>115.41 (e) The initial screening tool considers prior acts of sexual abuse, prior convictions for violent offenses, and prior history of institutional violence to determine if the inmate is at risk of being sexually abusive.</p> <p>115.41 (f) MWCC is not currently reassessing the inmates risk of victimization or abusiveness within 30 days of arrival to the facility.</p>

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

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

115.41 (i) MWCC has done a great job securing the screening form. Based off of interviews and access location of the forms, only those staff, who need to know the information disclosed or obtained on the form, have access to it.

Corrective Action Plan:

MWCC will need to demonstrate to the auditor that any new inmate that arrives at the facility has been reassessed for the risk of victimization or abusiveness based on any additional, relevant information received by the facility since the initial intake screening. The reassessment should not exceed 30 days from the inmates arrival at MWCC. MWCC should provide to the auditor documentation on a monthly basis that reassessments are be conducted.

Corrective Action:

During the corrective action period, the WIDOC implemented a new statewide computer program to capture all initial intake screenings and the 30 day reassessment. The auditors were provided a computer report showing an inmates initial screening within 72 hours of arrival at the facility and documentation that the 30 day reassessment was completed. MWCC has been able to provide the auditor with all the requested documentation related to this standard. MWCC has satisfactory completed the corrective action plan and this standard is now considered "meets the standard".

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



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

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

<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA)</li> <li>3. Interviews with PREA Analyst &amp; Administrative Remedies Staff Person</li> </ol> <p>Findings (By Subsection):</p> <p>115.52 (a-g) WIDOC does not have a formal administrative procedure to address inmate grievances regarding sexual abuse. If a report of sexual abuse is submitted through the administrative remedies process, it is immediately forwarded to facility leadership. MWCC has not had any reports of sexual abuse submitted through the administrative process by inmates in the past 12 months.</p> <p>Corrective Action: None</p>



<b>115.53</b>	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA)</li> <li>3. Interviews with PREA Compliance Manager, Local Advocacy Group, &amp; Random Staff</li> <li>4. Tour Observations</li> </ol> <p>Findings (By Subsection):</p> <p>115.53 (a) MWCC makes available to inmates a local support services organization, and this information is posted throughout the facility. The Healing Center, which is located in close proximity to MWCC provides inmates with emotional support and advocacy services. This auditor spoke with Stacy at The Healing Center (414-671-4325) who confirmed their role with providing support services to inmates who need support services related to sexual abuse. MWCC does not house individuals solely for civil immigration purposes.</p> <p>115.53 (b) In the WIDOC inmate handbook, inmates are informed about the extent to which communications will be monitored. Inmates receive this information well before they are given access to outside support services.</p> <p>115.53 (c) WIDOC has documentation showing attempts to enter into an agreement with a community services provider that is able to provide confidential emotional support services related to sexual abuse. The Memoranda of Understanding is currently being reviewed at the advocacy center.</p> <p>Corrective Action: None</p>

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

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

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

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Evidence Reviewed (Documents, Interviews, Site Review):  1. Pre-Audit Questionnaire 2. Interview with Staff and Superintendent 3. Incident Report  Findings (By Subsection):  115.63 (a,b & c) WIDOC has a policy that requires a facility that has received an allegation of an inmate who was sexually abused at another facility, the head of the facility that receives the allegation must notify the head of the facility where the allegation occurred within 72 hours. MWCC had one incident and the allegation was sent via an incident report to the Warden of the facility where the allegation occurred.  115.63 (d) MWCC has not had an incident where they have received a notification from another facility stating that an inmate was sexual abused while they were incarcerated at MWCC. Staff is aware of the PREA requirement and Executive Directive 72 mandating that they investigate the allegation.  Corrective Action: None



<b>115.64</b>	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Interviews with Staff</li> <li>3. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA)</li> </ol> <p>Findings (By Subsection):</p> <p>115.64 (a) WIDOC Executive Directive 72 Section XVI details the first responder duties for a security staff member in accordance with the following:</p> <ol style="list-style-type: none"> <li>1. Separate the alleged victim and abuser;</li> <li>2. Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence;</li> <li>3. If the abuse occurred within a time period that still allows for collection of physical evidence, request that the alleged victim not take any actions that could destroy the physical evidence; and</li> <li>4. If the abuse occurred within a time period that still allows for collection of physical evidence, ensure that the alleged abuser not take any actions that could destroy the physical evidence.</li> </ol> <p>MWCC has not had an incident where a security member had to act as a first responder. Interviews with security staff confirmed they knew their role if such an incident were to occur.</p> <p>115.64 (b) WIDOC Executive Directive 72 Section XVI details the first responder duties for non-security staff member in accordance with the following:</p> <ol style="list-style-type: none"> <li>1. Request that victim not take any actions that could destroy physical evidence; and</li> <li>2. Notify security staff.</li> </ol> <p>MWCC has not had an incident where a non-security member had to act as a first responder. Interviews with non-security staff confirmed they knew their role if such an incident were to occur.</p> <p>Corrective Action: None</p>

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

<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>
	Evidence Reviewed (Documents, Interviews, Site Review):  1. Pre-Audit Questionnaire 2. Interviews with the Superintendent & Agency Head Designee  Findings (By Subsection):  115.66 (a) The WIDOC has not entered into any collective bargaining agreement or any other agreement that would limit the agency's ability to remove alleged staff sexual abusers from contact with any inmate pending the outcome of an investigation. Interviews with the Agency Head Designee and the Superintendent confirm that they would remove alleged staff sexual abusers from contact with inmates, if warranted.  Corrective Action: None

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



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

115.71	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA)</li> <li>3. Interviews with Investigatory staff</li> </ol> <p>Findings (By Subsection):</p> <p>115.71 (a) WIDOC Executive Directive 72 Section XVII mandates that Investigators investigate all allegations of sexual abuse and sexual harassment promptly, thoroughly, and objectively for all allegations. Interviews with staff in charge of conducting investigations confirmed that they follow this policy. MWCC reports that they have had zero allegations of sexual abuse and sexual harassment in the past 12 months.</p> <p>115.71 (b) WIDOC has trained 253 staff members in the Department who have received specialized training in sexual abuse investigations. These staff members received a training certificate demonstrating that they have completed the training.</p> <p>115.71 (c) WIDOC Investigators were trained in how to gather and preserve direct and circumstantial evidence. WIDOC follows their evidence protocol and first responder protocol related to protecting and preserving the scene and evidence. If the sexual abuse allegation potentially involves criminal behavior, the Milwaukee Police Department would be called and they would be in charge of the investigation.</p> <p>115.71 (d) WIDOC policy states that when there is evidence that appears to support criminal prosecution, MWCC would contact the Milwaukee Police Department and they would take over the investigations. MWCC Investigators interviewed said that they would document this transaction.</p> <p>115.71 (e) WIDOC Executive Directive 72 Section XVII prohibits requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation. Also, the credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis. Interviews with MWCC trained investigator's corroborated this policy is followed in practice.</p> <p>115.71 (f) WIDOC Executive Directive 72 Section XVII requires the Investigation's staff to make an effort to determine whether staff actions or failures to act contributed to the abuse and document in a written report a description of the evidence, the reasoning behind credibility assessments, and investigative facts and findings. Interviews with MWCC trained investor's corroborated this policy is followed in practice.</p> <p>115.71 (g) The Milwaukee Police Department conducts all criminal investigations for allegations of criminal activity at MWCC. Their reports follows the requirements of this</p>

standard.

115.71 (h) The Milwaukee Police Department conducts all criminal investigations for allegations of criminal activity at MWCC. Any substantiated allegations of conduct that appears to be criminal would be forwarded for prosecution.

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

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

115.71 (k) N/A

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

Corrective Action: None

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

<b>115.73</b>	<b>Reporting to 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 1010 360">Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol data-bbox="252 412 1401 573" style="list-style-type: none"> <li>1. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA)</li> <li>2. Sample Notification Letter</li> <li>3. Interviews with Investigatory staff</li> <li>4. Pre-Audit Questionnaire</li> </ol> <p data-bbox="252 624 587 658">Findings (By Subsection):</p> <p data-bbox="252 710 1453 913">115.73 (a) WIDOC Executive Directive 72 Section XVII requires the inmate to receive notification as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. In the past 12 months MWCC has not had any allegations of sexual abuse in the facility. MWCC was able to show the auditor a sample letter should such an incident occur.</p> <p data-bbox="252 965 1469 1126">115.73 (b) WIDOC Executive Directive 72 Section XVII requires the facility to request relevant information from the investigation in order to inform the inmate. Interviews with the Superintendent and Investigator confirmed that this would be the practice if an incident requiring another investigative agency were to occur.</p> <p data-bbox="252 1178 1481 1256">115.73 (c) WIDOC Executive Directive 72 Section XVII requires the facility to inform the inmate who alleges that a staff member committed sexual abuse against the inmate whenever:</p> <ol data-bbox="252 1267 1469 1514" style="list-style-type: none"> <li>1. The staff member is no longer posted within the inmate's unit</li> <li>2. The staff member is no longer employed at the facility</li> <li>3. The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility</li> <li>4. The agency learns that the staff member has been convicted on a charge related to sexual abuse with the facility</li> </ol> <p data-bbox="252 1568 1485 1646">115.73 (d) WIDOC Executive Directive 72 Section XVII requires the facility to inform the inmate who alleges that another inmate committed sexual abuse against the inmate whenever:</p> <ol data-bbox="252 1657 1461 1818" style="list-style-type: none"> <li>1. The agency learns that the alleged abuser has been indicted or a charge related to sexual abuse within the facility</li> <li>2. The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.</li> </ol> <p data-bbox="252 1870 1481 1989">115.73 (e) WIDOC Executive Directive 72 requires all notifications or attempted notifications to be documented. MWCC provided the auditor with a sample letter if an incident were to occur that would require notification.</p> <p data-bbox="252 2040 560 2074">Corrective Action: None</p>



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

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

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



115.81	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed (Documents, Interviews, Site Review):</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Executive Directive 72: Sexual Abuse and Sexual Harassment in Confinement (PREA)</li> <li>3. Interviews with Medical and Mental Health</li> <li>4. Authorization for Disclosure of Non-Health Confidential Information Form</li> <li>5. Authorization for Use and Disclosure of Protected Health Information Form</li> </ol> <p>Findings (By Subsection):</p> <p>115.81 (a) WIDOC Executive Directive 72 Section XII requires that all inmates who have disclosed prior sexual victimization during an intake screening are offered a follow-up meeting with a mental health practitioner within 14 days of the initial or follow-up screening. During the past 12 months, MWCC had one inmate who disclosed prior sexual victimization and that individual was offered a follow-up meeting with a mental health practitioner.</p> <p>115.81 (b) WIDOC Executive Directive 72 Section XII requires that all inmates who have previously perpetrated sexual abuse, as indicated during the intake screening, are offered a follow-up meeting with a mental health practitioner within 14 days of the screening. During the past 12 months, MWCC had one inmate who previously perpetrated sexual abuse and that individual was offered a follow-up meeting with a mental health practitioner.</p> <p>115.81 (d) WIDOC Executive Directive 72 Section XII requires that appropriate controls be placed on the dissemination of information gathered from the initial and follow-up screenings to ensure that sensitive information is not exploited. Information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health clinicians and other employees, as necessary, to inform treatment plans and security and management decisions.</p> <p>115.81 (e) WIDOC Executive Directive 72 Section XII requires medical and mental health practitioners to obtain informed consent from the inmates before reporting information about prior sexual victimization that did not occur in an institutional setting. Interviews with medical and mental health staff confirmed that they follow this policy and the auditor reviewed a copy of the informed consent form.</p> <p>Corrective Action: None</p>

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

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



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

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

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



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

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Evidence Reviewed (Documents, Interviews, Site Review):  1. WIDOC Website 2. Inmate Interviews 3. Tour Observations  Findings (By Subsection):  115.401 (a) The Wisconsin Department of Corrections has 38 facilities that are required to be audited under the PREA standards. While the agency did not audit one-third of its facilities in each of the years of the first cycle it has completed all of the audits within the 3 year period.  115.401 (h) The audit team was able to enter all areas within the facility without restriction.  115.401 (i) The audit team was able to receive all relevant documents that were requested.  115.401 (m) The audit team was provided with offices that allowed for private interviews.  115.401 (n) Inmates were able to send confidential information to the auditor in the same way they would communicate with legal counsel.  Corrective Action: None

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Evidence Reviewed (Documents, Interviews, Site Review):  1. WIDOC website  Findings (By Subsection):  115.403 (f) The WIDOC website lists all the previous PREA audit reports (38) that were conducted. They can be viewed by going to the following web link <a href="http://doc.wi.gov/About/DOC-Overview/Office-of-the-Secretary/Prison-Rape-Elimination-Act-Unit">http://doc.wi.gov/About/DOC-Overview/Office-of-the-Secretary/Prison-Rape-Elimination-Act-Unit</a> .  Corrective Action: None