

PREA Facility Audit Report: Final

Name of Facility: Chesterfield County Jail

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 07/18/2019

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: LaWanda M. Long	Date of Signature: 07/18/2019

AUDITOR INFORMATION	
Auditor name:	Long, Lawanda
Address:	
Email:	Lawandamlong@aol.com
Telephone number:	
Start Date of On-Site Audit:	05/06/2019
End Date of On-Site Audit:	05/08/2019

FACILITY INFORMATION	
Facility name:	Chesterfield County Jail
Facility physical address:	6900 Mimms Drive, Chesterfield, Virginia - 23832
Facility Phone	804-748-1476
Facility mailing address:	P.O. Box 940, Chesterfield, Virginia - 23832
The facility is:	<input checked="" type="radio"/> County <input type="radio"/> Federal <input type="radio"/> Municipal <input type="radio"/> State <input type="radio"/> Military <input type="radio"/> Private for profit <input type="radio"/> Private not for profit
Facility Type:	<input type="radio"/> Prison <input checked="" type="radio"/> Jail

Primary Contact			
Name:	Robert Penepacker	Title:	Lieutenant-PREA Coordinator
Email Address:	penepackerr@chesterfield.gov	Telephone Number:	801-717-6702

Warden/Superintendent			
Name:	Major James Pritchett	Title:	Major-Jail Operations
Email Address:	pritchettj@chesterfield.gov	Telephone Number:	804-751-4909

Facility PREA Compliance Manager			
Name:		Email Address:	

Facility Health Service Administrator			
Name:	Dr. Georges Gay	Title:	Doctor
Email Address:	GayG@chesterfield.gov	Telephone Number:	804-768-7325

Facility Characteristics		
Designed facility capacity:	477	
Current population of facility:	269	
Age Range	Adults: 18-81	Youthful Residents:
Facility security level/inmate custody levels:	Minimum/Medium/Maximum	
Number of staff currently employed at the facility who may have contact with inmates:	287	

AGENCY INFORMATION	
Name of agency:	Chesterfield Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	P.O. Box 940, Chesterfield, Virginia - 23832
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:			
Name:	Karl S. Leonard	Title:	Sheriff
Email Address:	leonardk@chesterfield.gov	Telephone Number:	804-751-4410

Agency-Wide PREA Coordinator Information			
Name:	Robert Penepacker	Email Address:	penepackerr@chesterfield.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.

LaWanda Long, DOJ Certified PREA Auditor, conducted the PREA audit for Chesterfield County Jail on May 6-8, 2019, a total of thirty (30) hours were spent on-site. The audit began with the notification of the on-site audit that was posted by April 5, 2019, six weeks prior to the date of the on-site audit. The facility's last PREA audit was on March 21-23, 2016. The posting of the notices were verified during the tour and via interviews with both staff and inmates. The notices were posted in various locations throughout the facility including the front lobby (public side), housing pods, break rooms, medical, sallyport into the housing areas, intake and booking. The PREA Audit notice was also posted on the agency's website. This auditor did not receive any communication from the staff or inmates as a result of the posted notices. The Pre-Audit Questionnaire, policies, procedures, and supporting documentation for all forty-three (43) standards were uploaded to the Online Auditing System on April 10, 2019. This auditor spoke with the PREA Coordinator in reference to the on-site visit and discussed the information the auditor needed upon arrival on the first day of the PREA Audit. Also, additional supporting documents were provided during the on-site visit to address deficiencies/questions that this auditor had upon the review of the documentation uploaded. The additional documentation was uploaded by the PREA Coordinator. The on-site audit began on the morning of May 6, 2019, with an entrance meeting with the current PREA Coordinator and the previous PREA Coordinator. During the entrance briefing, the audit process was discussed and a tentative schedule for the three (3) days to include conducting staff and inmate interviews and reviewing the documentation.

A complete guided tour of the entire facility was conducted including the entrance to the administration building/main building. The main building is comprised of administration offices, conference room, master control, visitation, staff work areas, intake, kitchen, visitation, medical, classrooms, gymnasium, education offices and classrooms, program area, dining halls, staff dining, laundry/property area, outdoor recreation areas, law library/library, sally port, three housing units, and transit housing. The auditor also toured the Annex building, which consisted of two additional housing units. The housing units in the Annex consisted of four pods each and the Housing Unit in the Administrative (Main) Building consist of four dorms in two of the units and the dorms in the third housing unit. The other two pods are in Annex building and consist of four dorms each.

During the tour, inmates were observed to be under constant supervision of the staff while involved in various activities. The facility was well maintained. Notification of the PREA Audit was posted in all locations throughout the facility as well as postings informing inmates of the instructions to dial *1008#. Also during the tour, this auditor observed announcements being made when opposite gender staff entered in the housing. The auditor tested the PREA hotline while making rounds and it was discovered the reporting line was not working. Cameras and a video surveillance system enhance their capabilities to assist in monitoring blind spots and the review of incidents. Additionally, there were no cameras installed in the shower/toileting area so inmates are not seen on the surveillance system while showering or toileting. During the three (3) day on-site visit, there were a total of two hundred seven (207) inmates in

the facility. Twenty (20) inmates were randomly selected from five (5) housing units including the restricted housing unit with an inmate list provided by the PREA Coordinator on the morning of May 6, 2019, for the interview process. Two (2) of the twenty (20) inmates randomly selected were identified from the required list of targeted inmate interviews. The targeted categories outlined in the auditing guide was not met as the facility not have inmates that were identified in the designated categories. However, the two (2) inmates that were identified were inmates who identified as Lesbian, Gay or Bisexual. The facility does not house youthful offenders and did not have any other offenders identified in the other required categories: physical disability (Blind, Deaf or Hard of Hearing), LEP, cognitive disability, identify as transgender or intersex, segregation housing for high risk of sexual victimization, who reported sexual abuse, and who reported sexual victimization during risk screening.

Inmate interviews indicated they were well informed of their right to be free from sexual abuse and sexual harassment and how to report sexual abuse and sexual harassment using several ways of communication such as trusted staff, administrative staff, and the hot line (*1008#). The community victims' advocacy service and telephone number is available to the inmates. The James House agrees to provide free confidential crisis intervention and emotional support services related to sexual abuse or sexual assault for Chesterfield County Jail victims. Also, this auditor contacted the representative from the James House via telephone after to the on-site visit and confirmed they provide emotional support services to inmates.

Thirty-two (32) staff were formally interviewed including (15) staff from both shifts (supervisory and line staff), (2) medical and mental health staff, (1) staff supervising restrictive housing, (1) incident review, (1) PREA coordinator, (1) monitoring for retaliation, (3) upper level management, (1) human resources, (1) investigator, (2) risk screening, (1) intake staff, (2) volunteer/contractor and agency head (1) were interviewed during the three (3) days of the on-site visit. Overall, the interviews revealed the staff are very knowledgeable of the PREA standards and were able to articulate their responsibilities and their mandated duty to report.

At the end of the third day, an exit briefing with a summary of the findings was conducted with the Major, Captain, PREA Coordinator and Lieutenant. At the exit debriefing, it was discussed additional documentation was required for twenty-seven (27) standards and it was determined this information would be sent to this auditor within the next thirty (30) days to be in compliance with all the PREA standards. The requested information was sent to this auditor prior to the submission of this report. This auditor reviewed all requested information and this facility is in full compliance with the PREA Standards.

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.

It is the mission of Chesterfield County Sheriff's Office to enhance public safety by providing a safe court environment, service of legal documents, and comprehensive care of inmates through professional and unbiased performance.

Chesterfield Sheriff's Office is located in Chesterfield County, Virginia and is a proud member of its public safety community. The jail opened in May 2006 and falls under the Operational Bureau of the Chesterfield County Sheriff's Office. They take an active role in the community and take seriously their role of being stewards of public trust. Chesterfield Sheriff's Office working motto of Duty to Serve, Passion to do it with Dignity and Respect flows throughout their daily operations. Chesterfield's jail has approximately 477 beds available on a daily basis and maintains a daily population of approximately 285 inmates to include work release inmates. The Chesterfield County Jail has five (5) housing units with eighteen (18) pods. There are 18 segregation cells, three single cells 123 multiple occupancy cells and 202 beds in open bay dormitories. Healthcare services for the Chesterfield County Jail are provided by the Chesterfield County Sheriff's Office. Medical used to be provided 24 hours a day seven days a week. Mental Health services are provided through an agreement with the Community Service Board.

The BRIDGE program was created exclusively by the Chesterfield County Sheriff's Office and was started in 2011 and targets substance abuse issues. BRIDGE consists of: 12 Step meetings, Anger management, Classes, Criminal and addictive thinking, Employment, Group and individual sessions that target coping skills, Living balance, Meditation skills, Moral Recognition Therapy (MRT), Relapse prevention. Participants are required to attend the program for a minimum of 90 days and no more than 12 months then released to the community after completing the program.

On March 8, 2016, Chesterfield County witnessed their tenth heroin related death for the year. That significant event was the turning point that became the motivation for us to begin their heroin recovery program (Heroin Addiction Recovery/HARP). At first Chesterfield County Sheriff's Office provided a hodgepodge of recovery programs, which quickly developed into a detailed curriculum delivered by experts in various subject areas. The program grew and within weeks, it exceeded capacity. Chesterfield County Sheriff's Office then relocated the program to another part of the jail allowing us the ability to increase participation significantly. HARP continues to save lives and return productive members back into our community.

They take great pride in their forward thinking, through the programs they offer inmates to influence their lives in a positive manner and help break the cycle of recidivism. Chesterfield Sheriff's Office employee know that trust is a vital role in this progression that is why participation and compliance with the Prison Rape Elimination Act is a priority to the operation of the Chesterfield County Jail.

AUDIT FINDINGS

Summary of Audit Findings:

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

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

Number of standards exceeded:	1
Number of standards met:	44
Number of standards not met:	0

Number of Standards Exceeded: 1 (115.86)

Number of Standards Met: 44

Number of Standards Not Met: 0

Summary of Corrective Action (if any) NA

Standards

Auditor Overall Determination Definitions

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

Auditor Discussion Instructions

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, mandates a zero tolerance policy toward all forms of sexual abuse and sexual harassment. Per Policy 3-25.1, Sexual conduct by an employee with a person committed to the custody of the Chesterfield Sheriff's Office whether it occurs inside the jail, during transportation, outside of the jail or at any other time during an inmate's custody, is strictly prohibited. An employee who engages in sexual conduct, including sexual contact with an inmate is subject to termination. The Chesterfield Sheriff's Office policy 3-25.1, further prohibits employees from indulging in an undue familiarity with inmates or permitting undue familiarity on the part of the inmate toward themselves. Any sexual abuse of an inmate by a staff member will result in severe disciplinary action and will be prosecuted to the fullest extent of the law. Employees also face registration as a sex offender and may be held financially liable and not indemnified by Chesterfield County or the Chesterfield Sheriff's Office if sued as a result of their actions. Any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and shall be reported to the proper law enforcement agency, unless the activity was clearly not criminal, and to relevant licensing bodies. The department will take appropriate remedial measures and will consider whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment by a contractor or volunteer.</p> <p>Chesterfield Sheriff's Office policy 3-25.1, also confirms that inmate rules prohibit an inmate from engaging in or soliciting a sexual act with another inmate.. Inmates who engage in sexual abuse will be arrested and referred for prosecution as well as disciplinary action. Policy 3-25.1, directs all employees, regardless of title, that they have a duty to report any sexual contact, sexual abuse, sexual harassment, staff voyeurism, or information regarding inappropriate relationships between an employee and inmate. Such duty to report will include any allegations, knowledge or reasonable belief regarding such conduct. The policy provides comprehensive guidelines for implementing the jail's approach towards reducing and preventing sexual abuse, sexual harassment, and sexual misconduct of inmates. The policy provides detail information of how they will respond to sexual abuse and sexual harassment allegations.</p> <p>Chesterfield Sheriff's Office policy 3-25.1, designates the classification lieutenant as the the individual charged with the responsibility of all Prison Rape Elimination Act compliance for the Chesterfield County Sheriff's Office. An interview with the PREA Coordinator confirmed he works very hard to implement the PREA Standards and indicated he has sufficient time and authority to develop, implement and oversee the agency's efforts toward PREA compliance of the with the support of the Captain, Major, and Sheriff. The classification lieutenant reports directly to the Captain who reports directly to the Major who serves as the facility head for Chesterfield Sheriff's Office.</p> <p>Affirmation was received during the interviews of random and specialized staff and inmate interviews that the administration has taken the PREA Standards very seriously and embedded it within the daily operation of the jail. Their commitment to protecting the inmates</p>

in their care and custody is evident throughout the Chesterfield Sheriff's Office team. During the tour of the facility, PREA posters were observed and PREA documentation was visible throughout the facility, creating a PREA complaint culture.

Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.

115.12	Contracting with other entities for the confinement of inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Chesterfield Sheriff's Office had a contract with Riverside Regional Jail Authority to house inmates for Chesterfield Sheriff's Office. Support documentation confirms that this contract is still in effect; however, it has not be renewed since 2005 and is still in its original format. Staff were encouraged to include the required PREA language if/when the contract is renewed.</p> <p>Riverside Regional Jail implements its "Zero Tolerance" policies through a facility-wide systemic process that begins when inmates are initially admitted into the facility. When inmates enter the intake are they are met with a comprehensive educational process where their rights to be free from sexual abuse and harassment is explained in detail. Riverside Regional Jail has a designed PREA Coordinator and their PREA audit was conducted on May 8, 2017-May 10, 2017. The finding of their PREA audit was three (3) standards exceeding, thirty-eight (38) meeting and two (2) not applicable standards.</p> <p>Based on the review of documentation, the facility has demonstrated compliance with this standard.</p>

115.13	Supervision and monitoring
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1477 573">A review of Chesterfield County Sheriff's Office policy, 3-14.2, Security Inspections, revised on August 20, 2018, requires all supervisors to conduct unannounced post visits at least twice each shift to include weekends and holidays. Unoccupied areas will be toured at least once a week. Deputies will log these post visits in JMS when conducted. These rounds will assist in identifying and deterring staff sexual abuse and sexual harassment. Staff are prohibited from alerting staff members of rounds made by in accordance with this policy.</p> <p data-bbox="252 629 1461 831">A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, requires on a yearly basis, the jail administrator and security captain, in collaboration with the PREA Coordinator, will review the staffing plan to make adjustments as needed to ensure adequate levels of staffing are available to protect inmates against abuse.</p> <p data-bbox="252 887 1477 1256">This auditor reviewed monthly supporting documentation covering a one year period, confirming that supervisors conducted unannounced post visits in accordance with policy. During supervisory staff interviews it was confirmed by each interviewee that he or she makes unannounced rounds at least twice per shift to identify and deter staff sexual abuse and sexual harassment. The present and past PREA Coordinator indicated during their interviews that unannounced rounds are conducted on a daily basis on all shifts in areas throughout the facility to observe staff and inmate interactions and to deter staff from sexual abuse and sexual harassment. During the facility tour, this auditor observed and reviewed the JMS system where unannounced rounds were documented by the Deputies electronically.</p> <p data-bbox="252 1312 1461 1514">This auditor recommended during the site visit that additional language be added to the JMS system to indicate unannounced post visits to distinguish between other supervisory rounds. On June 10, 2019 this auditor was advised by the PREA Coordinator that the clarifying language was added to the JMS System to reflect unannounced post visits and supporting documentation confirming the language was added to the drop down box in the JMS system.</p> <p data-bbox="252 1570 1477 2074">Chesterfield County Sheriff's Office currently uses TeleStaff System which is a management system used to ensure that all posts are properly covered. This system alerts supervisory staff when a staff member has not been assigned to a post prior to the shift. This electronic system pulls from all approved leave and training schedules, ensuring proper staff coverage. A review of the current projected duty posts were composed of numbers required by deputies to fill those positions. In addition to the duty posts listed, the shifts consist of a Captain, Lieutenant, and 3 Sergeants for security of the facility. Any changes in staff coverage for the listed duty posts is required to be justified and documented. In addition to deputies conducting physical security checks throughout the facility, there are 112 cameras. The cameras are monitored by deputies assigned to control rooms. The layout of the facility allows the control room operators to visually inspect the housing areas through windows and cameras throughout the 22 housing areas.</p> <p data-bbox="252 2130 1374 2163">The interview with the Major (designated as the Jail Administrator) and documentation</p>

provided confirms that all projected staffing plans are approved by him and reviewed with Security Captains, Jail Physician, and PREA Coordinator on a yearly basis, addressing all eleven (11) categories as identified per the standard. The Major and Captain confirmed during their interviews any deviation from the staff planning must be documented. A review of the projected staffing plan for both 2018 and 2019 were provided to this auditor and addressed all the requirements of the standard.

Based on the review of the agency policy, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	This standards is Non-Applicable per memo and administrative staff the facility does not house youthful inmates.

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office policy, 3-13, Searches, revised May 12, 2016, requires Strip Search for inmates be performed by a member of the same sex as the person arrested. Body Cavity Search shall be conducted only when there is a probable cause to believe a particular inmate may be concealing contraband within a body cavity. If a search is required, the supervisor will first request permission from the jail administrator, the chief deputy of operations or the Sheriff, who may consult with the jail physician prior to rendering a decision. A search of any body cavity, other than the mouth, shall be conducted by or under the supervisions of medically trained personnel. A detailed written report of the search will be prepared by the supervisor listing probable cause and title of the person conducting the cavity portion of the search.</p> <p>A review of Chesterfield County Sheriff's Office, Policy 2-9, Transgender and Intersex Committals, revised date June 24, 2019, requires if the inmate's genital status is unknown, it may be determined during conversations with the committals, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner.</p> <p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, the facility Shall implement 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 or when such viewing is incidental to routine cell checks. Such policies and procedures shall require staff of the opposite gender to announce their presence when entering an inmate housing unit.</p> <p>Random staff and inmate interviews indicated that staff of the opposite gender entering the housing units always announced themselves. During the facility tour, this auditor observed opposite gender staff making announcements when entering the housing areas. This auditor recommended during the facility tour that the deputies making the gender announcement, document via the JMS system. This auditor's recommendation was openly accepted by the administration and the JMS system was updated to reflect these changes. Supporting documentation provided to the auditor reflected gender announcement documented in the JMS system.</p> <p>A review of the training documentation and staff interviews confirmed staff training on pat down searches, cross-gender pat searches and searches of transgender and intersex offenders are conducted in a respectful and professional manner. During staff interviews, all staff confirmed that cross gender pat search are not allowed and pat down searches were always performed by same gender staff. Staff were able to articulate what an exigent circumstance would be and were aware that only medical staff could perform body cavity searched. Interviews conducted with random females inmates confirmed that they are always pat searched by female staff and are never prohibited from attending programs because a female staff is not available to pat search them.</p>

Random staff and inmate interviews confirmed inmates are able to shower, perform bodily functions and change clothing without non-medical staff of the opposite gender viewing them. Staff interviews could identify policy on prohibiting staff from searching or physically examining a transgender or intersex offender for determining inmates genital status.

According to supporting documentation, there have been no cross-gender pat down searches, cross-gender strip or cross-gender visual body cavity searches of inmates conducted at the facility in the past twelve (12) months for the sole purpose of determining an inmate's genital status. In addition, there have been no exigent circumstances of cross-gender pat down, strip or visual body cavity searches of inmates conducted at the facility in the past twelve (12) months.

Based on the review of the agency policy, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Random staff interviews indicated the PREA education is provided in a manner to ensure the inmate comprehends the material. Intake staff confirmed that PREA information is provided upon the inmate's arrival. If the inmate advises staff or the intake staff determine that the inmate has a disability appropriate steps are taken to ensure that the inmate is able to understand the PREA information provided. Intake staff confirmed during their interviews that they read the information to the inmates. Also, there is a video that is shown during the intake process with includes closed caption. Chesterfield Sheriff's Office has a PREA brochure for the purposes of educating inmates, which includes information on suspicious behavior, reporting, prevention strategies, making false claims, sexual misconduct definitions, and retaliation. This brochure is available in English and Spanish. During the facility tour, this auditor observed the PREA postings throughout the facility in English and Spanish, including the *1008# access posted on the bulletin boards located in each housing unit.</p> <p>Chesterfield Sheriff's Office uses Certified Languages International for interpreter services for inmates who require over the phone or sight translation should the need arise. During staff interviews staff confirmed that inmates are never used as interpreters. Staff confirmed during the random interviews that the language line is available for usage in addition to google interpreter. When this auditor inquired about the usage of google interpreter, the administration confirmed that all staff were to use the Certified Language Line only. Supporting documentation was provided to this auditor during the writing of this report confirming that all staff received additional instructions regarding the usage of the language line only.</p> <p>Based on the review of information obtained through staff interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.17	Hiring and promotion decisions
	<p data-bbox="252 168 901 201">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 246 526 280">Auditor Discussion</p> <p data-bbox="252 324 1484 784">A review of the Chesterfield County Sheriff's Office, SOP, 500.19, Hiring/Volunteer Automatic Disqualifiers, Effective Date: June 27, 2019, mandates that Chesterfield Sheriff's Office shall complete a review of any claims of sexual harassment or sexual abuse. This is to include the following stipulation: The agency shall not hire or promote anyone who may have contact with inmates, and shall not enlist the services of any contractor who may have contact with inmates, who— (1) Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997); (2) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.</p> <p data-bbox="252 840 1484 1691">The agency shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates. Before hiring new employees who may have contact with inmates, the agency shall: (1) Perform a criminal background records check; and (2) Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. The agency shall also perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates. The agency shall either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees. The agency shall ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. The agency shall also impose upon employees a continuing affirmative duty to disclose any such misconduct. Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination. Unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.</p> <p data-bbox="252 1736 1484 1937">An interview with the Human Resources Manager confirmed background checks are completed on all current employees annually. These checks consider the pertinent civil or administrative adjudications for all newly hired employees who may have contact with inmates and anyone considered for promotion. Chesterfield Sheriff's Office also conducts the same checks for contractors.</p> <p data-bbox="252 1993 1484 2150">The PREA Background Investigation Form-CSO-COR 123 completed by the employee prior to an interview for employment contains the following questions: Have you engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution? Have you been convicted or engaging or attempting to</p>

engage in sexual activity in the community, facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? Have you been civilly or administratively adjudicated to have engaged in the activity described previously? Have you been accused of any form of sexual harassment? An applicant must successfully complete a background investigation before he or she can be selected for an interview.

The PREA Background Investigation Form-CSO-COR 126 completed by the contractor or volunteer prior to employment or rendering of services contains the following questions: Have you engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution? Have you been convicted or engaging or attempting to engage in sexual activity in the community, facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? Have you been civilly or administratively adjudicated to have engaged in the activity described previously? Have you been accused of any form of sexual harassment? Additionally, Chesterfield County Sheriff's Office has a Criminal Background Checks, Current Employees and Contractors Form CSO-COR 124, that is completed annually on all current employees and contractors, usually performed within the first quarter of the year. A form is completed on each employee and maintained in a binder in the Office of Professional Standards. The individual designated to conduct the annual background checks certify that no evidence was found in the VCIN indicating sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other such facility; or engaging or attempting to engage in sexual activity in the community, facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse.

This auditor reviewed supporting documentation for all background checks ran on current employees for both 2018 and 2019. In addition to Forms CSO-COR 123 & 126. Background checks were also verified on a sample review of staff, contractors, and volunteers files, who were randomly selected for interviews. It was recommended during the on-site portion of the audit that the agency maintain this information on an excel sheet or database in addition to the forms to ensure accountability of all employees, contractor and volunteers. The agency was very open to the recommendation and adopted this practice during the writing of this report. A copy of the excel sheet was provided to this auditor.

During the interview with both the Human Resource Manager, it was confirmed that staff have a continuing affirmative duty to disclose any such misconduct. An employee's failure to disclose any such previous misconduct would be grounds for termination. The agency will adhere to the standard and upon request will provide information on substantiated allegations of sexual abuse and sexual harassment involving former employees upon request.

Based on the review of the agency policy and procedures, observations and information obtained through staff interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of the memo submitted to the auditor by the facility PREA Coordinator indicated Chesterfield Sheriff's Office has not designed, acquired any new facilities, modified the existing facility or updated the video monitoring system during this audit cycle. During the interview with the Major he also confirmed that Chesterfield Sheriff's Office has not made any upgrades to the facility during this audit period. However, should the Chesterfield County Sheriff's Office design or acquire any new facilities or plan any substantial expansion or modification of existing facility, the agency shall consider the effect of the design, acquisition, expansion, or modification to protect inmates from sexual abuse. Per the Major, Chesterfield County Sheriff's Office shall also take in consideration when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, how such technology may enhance the agency's ability to protect inmates from sexual abuse.</p> <p>Based on observations and information obtained through staff interviews, and review of documentation the facility has demonstrated compliance with this standard.</p>

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, identifies to the extent the agency is responsible for investigating allegations of sexual abuse, the agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.</p> <p>The protocol shall be developmentally appropriate for youth where applicable, and, as appropriate, shall be adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011.</p> <p>The agency shall offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The agency shall document its efforts to provide SAFEs or SANEs.</p> <p>The agency shall attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the agency shall make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member. Agencies shall document efforts to secure services from rape crisis centers. For the purpose of this standard, a rape crisis center refers to an entity that provides intervention and related assistance, such as the services specified in 42 U.S.C. 14043g(b)(2)(C), to victims of sexual assault of all ages. The agency may utilize a rape crisis center that is part of a governmental unit as long as the center is not part of the criminal justice system (such as a law enforcement agency) and offers a comparable level of confidentiality as a nongovernmental entity that provides similar victim services.</p> <p>As requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals.</p> <p>To the extent the agency, itself is not responsible for investigating allegations of sexual abuse; the agency shall request that the investigating agency follow the requirements of paragraphs (a) through (e) of this section.</p> <p>The requirements of paragraphs (a) through (f) of this section shall also apply to: (1) Any State entity outside of the agency that is responsible for investigating allegations of sexual abuse in prisons or jails; and Any Department of Justice component that is responsible for</p>

investigating allegations of sexual abuse in prisons or jails. For the purposes of this section, a qualified agency staff member or a qualified community-based staff member shall be an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual assault and forensic examination issues in general.

The Chesterfield Sheriff's Office shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Administrative investigations are conducted by the Special Investigation Unit/Operations of Professional Standards and criminal investigation are conducted by Chesterfield Police Department.

A review of Chesterfield Sheriff's Office Policy ADM.18.01-06, PER.08.01-03, Internal Investigation, revised March 15, 2017, requires Chesterfield Sheriff's Office to establish an Investigative Unit, within the Professional Standards Division to investigate allegations of misconduct by employees or complaints against the agency. The image of the Sheriff's Office depends on the personal integrity and discipline of all employees.

In addition, it is the policy of the Chesterfield County Sheriff's Office to provide a fair, equitable, and clearly defined means for the resolution of complaints to ensure that employees are afforded a reasonable opportunity to file a complaint without fear of reprisals for doing so. The Sheriff has the responsibility for the coordination of complaint procedures and is the final authority concerning all personnel matters. Complaints investigated by the Investigative Unit as a criminal matter will normally precede the administrative investigation. (1) Employees who are subject to a criminal investigation by the Investigative Unit will be informed that the investigation is criminal and advised of their Miranda rights before questioning. Employees are entitled to the same constitutional rights afforded to any individual suspected of having committed a crime. Criminal complaints may be referred to another agency for investigation.

Once a complaint against an employee is received by the on-duty supervisor, it shall be forwarded directly to the Investigative Unit who will determine investigative responsibility.

If the Investigative Unit personnel are not reasonably available, the complaint should be forwarded to the Sheriff/Designee, who will review and assign the complaint for investigation. In the event the complaint is of a serious nature that needs immediate attention by the Investigative Unit, the person taking the complaint shall ensure that Investigative Unit is notified immediately. The Chief Deputy should be notified of a pending complaint as soon as possible through the chain of command.

All complaints investigated by either the Investigative Unit or supervisory personnel require a status report to be submitted to the Sheriff through the Investigative Unit every seven (7) days. Investigations concerning employee misconduct will be completed within 14 days unless an extension is granted by the Sheriff or designee.

All investigations of complaints against employees of this office will be conducted in the strictest of confidentiality and privacy keeping in mind the rights of all parties involved. Any person violating this policy or confidentiality of an internal investigation shall be subject to disciplinary action. The Sheriff/Designee must approve the release of any information from an internal investigation, including information on any action taken.

When an employee is under investigation or subjected to interrogation for any reason that could lead to punitive action against the employee, such investigation shall be conducted under the following conditions and requirements: When an employee is under investigation as a result of a misconduct complaint, the investigating officer will notify the employee in writing of the nature of the complaint, the name of the complainant, and the date and location of the complaint. Notification will be made, providing this notification does not jeopardize any investigation.

When an employee is being questioned as part of an official investigation being conducted as an administrative matter, they do not have the right to refuse to answer questions. All employees regardless of their investigation status (being investigated, a witness, etc.) are required to read and sign The Internal Investigations Warning. If an employee refuses to answer questions relating to the performance of their official duties or fitness for office, they will be subject to disciplinary action, which could result in dismissal from the Sheriff's Office. If they do answer, neither statements nor any information or evidence, which is gained by reason of such statements, can be used against them in any subsequent criminal proceeding. However, these statements may be used against an employee in relation to subsequent departmental charges.

Due to the employment with a constitutional office, there is no employee right to have an attorney present or represent them in the investigation or formal complaint process. However, the employee does have a right to represent him or herself.

Employees are required to cooperate with and participate in administrative investigations. Cooperation and participation may include, but not be limited to, a medical, physical, psychiatric, laboratory, polygraph examination, photographs, line-ups, hand-writing exemplars, submission of written reports and to submit financial disclosure statements if such information is relative to the investigation.

Failure to comply, cooperate with or participate in an administrative investigation may result in disciplinary actions, up to and including, termination.

A review of Chesterfield Sheriff's Office Policy OPR.02.01-04; OPR.20.07-08; OPR.03.01; OPR.14.01, Preliminary/Follow-up Criminal Investigation, revised: November 9, 2018, mandates once a crime has been committed for which the Sheriff's Office has responsibility for; to initiate an investigation which shall include identifying/interviewing all victims and witnesses; gathering/collecting/preserving/submitting any/all evidence for examination or to be used as evidence; identifying/interviewing/arresting all violators; complying with reporting guidelines; to properly document the aforementioned activity in order for a judge or jury to render an appropriate disposition.

A preliminary investigation consists of, but is not limited to, the following activities: Secure the scene to make it safe. Deputies shall limit access to crime scenes to those persons immediately and directly connected with the investigation. Provide aid to the injured. Record any alterations to the crime scene because of emergency assistance. Establish, maintain and protect the crime scene to ensure evidence is not lost or contaminated. Arrange for the collection of evidence. The police department evidence technicians are available to process the scene if needed. Determine if an offense has actually been committed, and if so, the exact

nature and circumstances of the offense. Furnish other deputies and law enforcement agencies with descriptions, method and direction of flight of suspects, and other relevant information concerning wanted suspect or suspects or vehicles. Locate, identify and interview all victims. Locate, identify and interview all witnesses. Locate, identify, and interview all suspects. If there is probable cause, effect an arrest and secure any weapons if it can be accomplished either at the scene, or through immediate pursuit. If the suspect or suspects are still at the scene, place in custody and secure any weapons. If there is not enough probable cause and there are enough suspicious circumstances to warrant a stop and frisk, one should be done.

Supervisory Responsibilities- The highest ranking on-scene supervisor or supervisor notified shall determine if additional manpower is needed to properly handle the matter. The highest ranking on-scene supervisor or supervisor notified shall determine if additional resources, e.g. equipment, evidence technician, barricades, aircraft, canines, explosive experts, hostage negotiator, assistance from public utilities, etc., are needed.

The highest ranking on-scene supervisor or supervisor notified is responsible for notification of the Sheriff, or Chief Deputy. He will also notify the police department if the incident is at a location other than the courthouse, jail, or courthouse/jail property. The highest ranking on-scene supervisor is responsible for the actions of all deputies participating in the matter and is responsible for ensuring the matter is properly handled.

The supervisor of the deputy initiating the arrest and/or investigation or on-duty supervisor shall review, approve, and initial the RMS Incident Report and all subsequent reports. The RMS Incident Report and any reports/documents filed with it shall be forwarded to the Investigative Unit through the chain of command. Reports shall be reviewed for completeness, legibility, clarity, timeliness, documentation of all relevant and required information, whether the matter has been properly investigated and whether the reviewing supervisor agrees with the deputy's recommendation to continue or suspend the investigation.

A review of Chesterfield County Police, Operations Manual, Chapter: Criminal Investigation, 2.3.02, Specialized Investigation, review date: May 18, 2019, requires Chesterfield County Police to assist sexual assault victims in a supportive manner, using appropriate crisis intervention skills. The thorough, complete and accurate collection of evidence is a vital and often key requirement for successful investigation(s) and prosecution of sexual assaults. The primary concern in a rape or sexual assault investigation is to maintain the physical and mental well-being of the victim while obtaining the evidence needed for a successful prosecution. Department members shall be aware of community services available to victims of sexual assault and make appropriate referrals for additional assistance. Sexual assaults involving juvenile victims, where the offender is a caretaker, shall require a Child Protective Services (CPS) notification if the alleged offense occurred in Chesterfield County, regardless of where the report was made. Department members shall be trained and knowledgeable about sexual assault investigation and its impact on victims. Department members shall provide transportation to sexual assault victims as needed to complete the investigation of such crime. Responding patrol officers shall: Give attention to the victim's emergency medical needs and, to the extent possible ensure the victim's physical and emotional well-being and safety. When the victim requests an investigator of a particular gender, that request will be honored whenever possible. Preserve the crime scene. Be alert to any suspect in the vicinity.

Explain their role to the victim and what will be done at the scene and throughout the investigation. Obtain preliminary statements from victim and witnesses. Remember to keep all parties separated during interviews and when obtaining statements. Attain information regarding the identity and/or location of the suspect as soon as possible. Notify Investigations supervisor about the details of the case and request detective response if appropriate. Ask whether the victim would like to have a support person present. Inform the victim that the Criminal Injuries Compensation Fund pays for counseling and other crime-related fees. Expenses related to the PERK {Physical Evidence Recovery Kit} exam are paid by the state. If the assault occurred within the last 72 hours, arrange for transportation to a hospital for a sexual assault examination. Consultation with a Forensic Nurse Examiner should occur in cases between 72 and 120 hours old, as there may still be an opportunity to recover evidence in some situations that are older than 72 hours. If the assault occurred more than 72 hours earlier, recommend that at a minimum, the victim seek medical attention. Explain the medical and legal advantages of this exam to the victim. Inform the victim to take a change of clothing in the event that clothing worn will be collected as evidence.

The responding detective trained in sexual assault investigation shall obtain a complete report from the patrol officer assigned to the case. Involved officers shall: At the crime scene: The patrol officer shall protect the crime scene and the detective shall establish a rapport with the victim, ensure safe transportation of the victim to the hospital, and begin the preliminary investigation. At the hospital: Arrange for the collection of evidence needed for prosecution. Explain sexual assault exam procedures to the victim and establish a rapport for further interviews. The detective should not be in the room during the sexual assault exam. In any Interview: Before interviewing, review the patrol officer's report and establish a rapport with the victim by allowing her or him to ask preliminary questions or voice initial concerns. If the victim desires, a support person may be present. Prepare the victim for each phase of the investigation; explain what must be done and the reasons why. The PERK exam must be done ASAP in the interests of victim health and safety, evidence collection and substance/drug identification. Encourage every victim to obtain this exam for their own health and safety and decide (if hesitant) about reporting the crime at a later date. Inform the victim that all PERK assault examinations are paid by the state regardless of the victim's cooperation in the investigation. If the victim wants to prosecute or cooperate with the police investigation and has previously completed an anonymous PERK examination within the last 120 days, the detective shall notify the state lab in writing and make arrangements for testing/analysis.

Sexual assault investigations shall not be contingent on victim submission to a polygraph examination. A false report charge should never be brought against a victim on grounds that the victim is hesitant or fearful to cooperate with the investigation. At the conclusion of the interview, the investigator shall ask about any additional assistance needed by the victim and, if desired, refer the victim to the local sexual assault crisis center 1-800-838-8238 and Victim Witness Assistance Program, 717-6179. The victim should be reminded that it is common to remember additional details later and should be encouraged to write down what they recall and call anytime with additional information or to ask questions. As soon as practicable, alert the victim/witness assistance advocate that a sexual assault has occurred. Provide the necessary information for staff to contact the victim.

Evidence Collection - Sexual Assaults - The PERK should be administered by a Forensic Nurse Examiner (FNE). Whenever possible, the FNE should be notified prior to the victim's

arrival at the hospital. The FNE will need the name of the detective handling the case. The completed PERK will be placed in a bag provided with the kit for that purpose, sealed and initialed by the examining medical staff. The PERK can then be picked up by any officer or forensic investigator and transported to Police Property for appropriate storage. Suspect PERKs are the responsibility of the primary detective. Assistance may be enlisted from forensic investigators. Upon completion of any PERK kit, the primary detective will immediately complete a PD71 and turn it into the Forensic Unit for submission to the Division of Forensic Science.

Juvenile Sexual Abuse- A Special Victims Section detective should be the primary investigator of juvenile sexual abuse. If one is not available the on-duty detective should begin the preliminary investigation, obtaining and documenting all the necessary information for Special Victims Section follow up.

Supporting documentation confirms that Chesterfield County Sheriff's has a Memorandum of Understanding dated January 20, 2015, with Chesterfield County Police Department reaffirming the approval for Chesterfield Police Department to investigate any sexual assault/sexual abuse complaints that the Chesterfield County Sheriff's Office received involving an inmate, parolee, probationer, detain, pretrial or post trail offender occurring in Chesterfield County. In addition to utilizing the Chesterfield Crime Solvers, phone hotline as a method to receive third-party reports of sexual abuse and sexual harassment. This signed MOU also, confirms that County Sheriff's Office will cooperate with and assist Chesterfield County Police Department investigators in any way possible, in addition providing available resources.

A review of the Cooperative Agreement between Chesterfield Community Service Boards and Chesterfield County Sheriff's Office initiated on July 1, 2104 for a twelve (12) month period, with automatic renewal until termination by either party at the end of the fiscal year upon sixty (60) days written notice. The Community Service Board agrees to provide the following services: The services of a Senior Mental Health Clinician for up to ten (10) hours per week at the County Jail. Specific services will vary and be determined in consultation with the Medical Director, Sheriff or his designee, and may include the following: provide initial evaluation of inmates who may require mental health services, and/or arrange for such evaluations or other mental health services to be provided by the Services Board; review status of inmates on close watch and make recommendations to jail personnel; perform crisis evaluations and assist jail personnel in petitioning the court or magistrate for TDO or involuntary commitment as needed; provide crisis intervention as needed; provide mental health training to jail staff as requested; provide consultation to jail personnel about behavior management of inmates or other mental health concerns.

Chesterfield County Sheriff's Office indicated inmates who require a forensic examination will be transported to St Mary's-Bon Secours Richmond Health System, where trained and certified SANE examiners conduct SANE exams. Additionally, per the Forensic Director at St. Mary's additional testing, STD Prophylaxis and options as medically determined would be administered. Upon the inmates return to the facility, the medical staff confirmed during the specialized interview that follow-up care would be provided and appropriate medical appointment would be made for any medical care that cannot be accomplished via the facility medical department.

Based on the review of the agency policies, observations and information obtained through random staff and specialized staff interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019,, mandates that Chesterfield Sheriff's Office shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Administrative investigations are conducted by the Special Investigation Unit/Office of Professional Standards and criminal investigation are conducted by Chesterfield Police Department.</p> <p>Chesterfield Sheriff's Office Policy ADM.18.01-06, PER.08.01-03, Internal Investigation, Effective August 1, 2001, Revised March 15, 2017, It is the policy of the Chesterfield Sheriff's Office to establish an Investigative Unit, within the Professional Standards Division to investigate allegations of misconduct by employees or complaints against the agency. The image of the Sheriff's Office depends on the personal integrity and discipline of all employees.</p> <p>In addition, it is the policy of the Chesterfield County Sheriff's Office to provide a fair, equitable, and clearly defined means for the resolution of complaints to ensure that employees are afforded a reasonable opportunity to file a complaint without fear of reprisals for doing so. The Sheriff has the responsibility for the coordination of complaint procedures and is the final authority concerning all personnel matters.</p> <p>A review of Chesterfield Sheriff's Office Policy OPR.02.01-04; OPR.20.07-08; OPR.03.01; OPR.14.01, Preliminary/Follow-up Criminal Investigation, revised: November 9, 2018, mandates once a crime has been committed for which the Sheriff's Office has responsibility for; to initiate an investigation which shall include identifying/interviewing all victims and witnesses; gathering/collecting/preserving/submitting any/all evidence for examination or to be used as evidence; identifying/interviewing/arresting all violators; complying with reporting guidelines; to properly document the aforementioned activity in order for a judge or jury to render an appropriate disposition.</p> <p>There were fourteen (14) allegations of sexual abuse and sexual harassment received during this audit period. Six (6) out of the fourteen (14) allegations were referred for criminal investigations. A review of all fourteen (14) investigation files was conducted by this auditor. All administrative and criminal investigations have been completed.</p> <p>A review of Chesterfield County Police, Operations Manual, Chapter: Criminal Investigation, 2.3.02, Specialized Investigation, review date: May 18, 2019, requires Chesterfield County Police obtain preliminary statements from victim and witnesses. Remember to keep all parties separated during interviews and when obtaining statements. Attain information regarding the identity and/or location of the suspect as soon as possible. Notify Investigations supervisor about the details of the case and request detective response if appropriate. Ask whether the victim would like to have a support person present. Inform the victim that the Criminal Injuries Compensation Fund pays for counseling and other crime-related fees. Expenses related to the PERK {Physical Evidence Recovery Kit} exam are paid by the state. If the assault occurred within the last 72 hours, arrange for transportation to a hospital for a sexual assault</p>

examination. Consultation with a Forensic Nurse Examiner should occur in cases between 72 and 120 hours old, as there may still be an opportunity to recover evidence in some situations that are older than 72 hours. If the assault occurred more than 72 hours earlier, recommend that at a minimum, the victim seek medical attention. Explain the medical and legal advantages of this exam to the victim. Inform the victim to take a change of clothing in the event that clothing worn will be collected as evidence.

The responding detective trained in sexual assault investigation shall obtain a complete report from the patrol officer assigned to the case. Involved officers shall: At the crime scene: The patrol officer shall protect the crime scene and the detective shall establish a rapport with the victim, ensure safe transportation of the victim to the hospital, and begin the preliminary investigation.

Supporting documentation confirms that Chesterfield County Sheriff's Office has a Memorandum of Understanding (MOU) dated January 20, 2015, with Chesterfield County Police Department reaffirming the approval for Chesterfield Police Department to investigate any sexual assault/sexual abuse complaints that the Chesterfield County Sheriff's Office received involving an inmate, parolee, probationer, detain, pretrial or post trial offender occurring in Chesterfield County. In addition to utilizing the Chesterfield Crime Solvers' phone hotline as a method to receive third-party reports of sexual abuse and sexual harassment, this signed MOU also, confirms that Chesterfield County Sheriff's Office will cooperate with and assist Chesterfield County Police Department investigators in any way possible, in addition providing available resources.

Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, mandates that all sworn staff employed by the Chesterfield Sheriff's Office will receive, during basic academy training and in-service training every two (2) years, instruction that relates to the prevention, detection, response, and investigation of staff-on-inmate and inmate-on-inmate sexual abuse. Civilian staff receive PREA training during initial staff orientation training. Medical and mental health staff will receive training on prevention, detection, response, coordination of care, forensic preservation and counseling services. All staff must acknowledge that they understood the training received.</p> <p>A review of the staff training documentation including staff electronic training rosters, and staff interviews confirmed all sworn staff receives PREA training during basic academy training and refresher PREA training throughout the year during briefing. All civilian employees receive PREA training during orientation in addition to receiving refresher PREA training throughout the year. All employee have to acknowledge that they understood the training they received. During the timeframe of March thru June 2018, all employees of Chesterfield County Sheriff's Office completed the e-learning training offered by the National Institute of Corrections (NIC) PREA: Your Role to Sexual Abuse and had to obtain a passing score on the test in order to receive a certificate confirming that they understood their responsibilities in regards to PREA. This training included; zero-tolerance policy for sexual abuse and sexual harassment; How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; Inmates' right to be free from sexual abuse and sexual harassment; The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; The dynamics of sexual abuse and sexual harassment in confinement; The common reactions of sexual abuse and sexual harassment victims; How to detect and respond to signs of threatened and actual sexual abuse; How to avoid inappropriate relationships with inmates; How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.</p> <p>Staff interviews confirmed staff receive continuous training, their comprehension of the PREA training and their obligation to report any allegation of the sexual abuse and/or sexual harassment. At the facility, it was evident through documentation, interviews and observation of the day-to-day operations that the staff is trained continually about the PREA standards during shift briefings and the completion of various on-line training. During random inmate interviews they indicated that staff took PREA allegations various seriously and they felt safe reporting allegations of sexual abuse and sexual harassment. The PREA Coordinator and all staff confirmed that they are always provided PREA refresher/reminders during staff briefing in addition to having continuous conversations with staff regarding the importance of PREA.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and the review of detailed documentation during the on-site visit and facility tour, the facility has demonstrated compliance with this standard.</p>

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of the volunteers and contractors training video revealed the video contained information about the department's zero-tolerance policy for sexual abuse and sexual harassment; responsibilities under the agency's sexual abuse and sexual harassment prevention, and detection. Volunteers and contractors sign the "PREA Training Acknowledgement Form" upon completion of the PREA training they received to affirm they received and understand the information presented. Additionally, this form advised the contractor/volunteer that any allegation of sexual abuse or sexual harassment will be thoroughly investigated and could result in permanent loss of privileges to enter the Chesterfield County Jail. The facility reports sixty-two (62) volunteers and contractors who may have access to offenders. A review of randomly selected individual contractors and volunteer files contained an acknowledgement that contractors and volunteers completed and understood their requirement for confidentiality and their duty to report any incidents of sexual abuse and/or sexual harassment. Interviews with a contractor and a volunteer confirmed their knowledge of the required PREA training and Chesterfield Sheriff's Office zero tolerance of any form of sexual activity at the facility as well as their duty to report sexual abuse or sexual harassment.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through the volunteer and contractor interviews and documentation, the facility has demonstrated compliance with this standard.</p>

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Interviews with intake staff confirmed inmates receive appropriate PREA information upon their arrival to the Chesterfield County Jail intake area. Inmates are provided with the Inmate Protection Policy PREA, which is available in both English and Spanish, PREA Housing Brochures and the inmate handbook. A review of the above mention material includes the agency zero-tolerance policy, how to report sexual abuse, sexual harassment or any staff sexual misconduct, definition of sexual abuse and sexual harassment, and the responsibility of Chesterfield County Sheriff's Office to thoroughly investigate and refer all criminal sexual acts for prosecution to the Commonwealth Attorney. This information is reviewed verbally by staff to ensure inmates are able to understand. A majority of the staff confirmed during random interviews that the language line would be used for limited English speaking individuals. However, a few staff members indicated that would you the google translation app.</p> <p>Posters were observed throughout the facility, to include the intake area that was visible to all inmates ensuring that key PREA information is continuously and readily available. Posters and PREA handouts clearly communicate Chesterfield Sheriff's Office zero-tolerance policy, how to report and the right to be free from sexual abuse, and sexual harassment.</p> <p>Prior to housing placement, the inmate reviews the comprehensive PREA video and completes the Sexual Victimization or Abusiveness Questionnaire with Classification staff. The comprehensive PREA Video informs inmates of their rights to be free from sexual abuse and sexual harassment, the right to be free from retaliation for reporting such incidents, ways to report sexual abuse and sexual harassment, preventing and responding to such incidents. Additionally a follow-up is usually conducted by Classification staff within twenty days to address any PREA question the inmate may have.</p> <p>This auditor reviewed twenty (20) inmate files to ensure that comprehensive PREA training was being provided in accordance with the PREA standard. Upon reviewing these files, it was confirmed that comprehensive training is being provided.</p> <p>Upon speaking with the PREA Coordinator, previous PREA Coordinator and Captain it was determined that staff should only be using the language line for interpreting services. All staff were provided clarification (PREA Update) regarding the usage of the language line on June 4, 2019 and uploaded to the online auditing system on June 7, 2019 during the writing of this report.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews, inmate interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation confirmed that specialized training for investigators via the National Institute of Corrections (NIC). Chesterfield Sheriff's Office has a total of four(4) investigators who have received training in accordance with this standard. An interview with the investigator confirmed completion of the required specialized investigator training as well as the PREA education and refresher training for all four investigators. The investigator indicated the specialized investigation training consisted of interviewing techniques, Miranda warnings, Garrity warnings, sexual abuse evidence collection, and the criteria and evidence to substantiated a case for administrative or prosecution referral. At the facility level, the investigator will conduct an initial inquiry into the alleged allegation of sexual abuse or sexual harassment, subsequently conduct an administrative investigation in consultation with the Office of Professional Standards. The Office of Professional Standards shall refer further investigation for the determination of criminal charges to Chesterfield Police Department.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews, and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The documentation review contained the training certificates (NIC) and staff rosters completed by all twelve (12) medical staff. Ten(10) of the twelve (12) staff are contractors and have received both the contractor PREA Training and the Specialized Medical Training. There are two (2) contract clinicians who work for the Community Service Board who provide counseling services for the inmates assigned to Chesterfield County Jail. Supporting documentation confirms that both employees have received PREA training for contractors and the National Commission on Correctional Health Care Specialized medical and mental health training. Also, the two medical staff who are employees of Chesterfield Sheriff's Office participate in in-services and refresher trainings. The medical staff at the facility does not conduct forensic examinations. Chesterfield Sheriff's Office has a MOU with St, Mary's Hospital to conduct all forensic exams. Interviews with two (2) medical staff confirmed they had received the appropriate training in detecting and assessing for signs of sexual abuse and sexual harassment; preservation of physical evidence of sexual abuse; responding effectively and professionally to victims of sexual abuse and sexual harassment, and how and to whom to report allegations or suspicious of sexual abuse or sexual harassment.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 2-1, Classification of Inmates, revised date June 18, 2019; mandates that all committed inmates will be placed in a transient area until after their pre-trial hearing. Classification will occur normally no later than 72 hours after the inmate's commitment, unless medical, mental and/or security status prohibits it. Such occurrences will be documented in writing. The classification process will be based primarily on, but not limited to, the following: An interview and orientation with the inmate; Medical or mental health status; Other relevant (available) information, (i.e. age and nature of offense); Past institutional record and criminal history; Review of the inmate's commitment card and all commitment papers; Propensity for assaultive/aggressive behavior; Escape risk potential; Need for protective custody; Sexual assault potential; and Suicide risk potential. Prior to an inmate being assigned permanent housing, they will be interviewed by a classification officer. Information obtained during the interview will be entered into the Jail Management System (JMS). VCIN/NCIC record checks will be obtained on all newly admitted inmates and used to verify criminal history information obtained during the interview. This is to be completed by running the inmate's name and date of birth and not directly with their SID/FBI number to ensure a wanted check is completed.</p> <p>Prior to completing the primary classification, the classification officer will review documentation from all prior incarcerations, specifically noting the inmate's institutional behavior and program involvement. The classification officer, utilizing the initial custody assessment instrument (decision tree), will gather all pertinent information and then complete the primary classification. The completion of this phase will be conducted in compliance with the established objective jail classification procedures.</p> <p>Any inmate identified as a possible victim of sexual assault or as an abuser will be identified in JMS under the risk factor tab as: PREA-Victim or PREA-Abuser.</p> <p>Inmates will not be disciplined for refusing to answer or not answering fully whether or not they have a mental, physical or developmental disability. No discipline will be applied if they do not disclose whether or not they are perceived to be gay, lesbian, bisexual, transgender, intersex, gender nonconforming, or if they have experienced sexual victimization. They will not face discipline if they do not fully reveal their own perception of vulnerability. All of these factors will be considered for risk of sexual victimization if known.</p> <p>Prior to transfer to the assigned housing level, the classification unit will ensure that the inmate orientation has been conducted, the orientation checklist has been completed and signed by the inmate, information regarding Prison Rape Elimination Act (PREA) has been provided, and an inmate handbook has been issued.</p> <p>A review of the twenty (20) randomly selected inmates files was conducted. With an arrival date ranging from July 2017 – May 2019, offender screening sheets confirmed the screening was conducted within twenty-four (24) hours upon the inmate's arrival. Inmate interviews indicated during the screening process, the staff would provide the inmate with the Inmate Questionnaire/Screening and have the inmate complete the assessment. Prior to completing</p>

the primary classification, the classification officer will review documentation from all prior incarcerations, specifically noting the inmate's institutional behavior and program involvement. The classification officer, utilizing the initial custody assessment instrument (decision tree), will gather all pertinent information and then complete the primary classification. Staff interviews confirmed that an initial screening is conducted within twenty-four (24) hours of the inmate's arrival. The screening that is conducted includes any disabilities, age, physical build, current and previous incarcerations, personal history, violent offenses, non-violent offenses, LGBTI status, mental disabilities, prior victimization and assaultive behaviors. The screening instrument does not consider whether the inmate is detained solely for civil immigration purposes because Chesterfield County Jail does not detain/hold inmates for civil immigration purposes. Any inmate identified as a possible victim of sexual assault or as an abuser will be identified in JMS under the risk factor tab as: PREA-Victim or PREA-Abuser. Inmates reporting prior victimization, according to staff, are referred immediately for a follow-up with the Community Service Board staff. During the audit period Chesterfield County Jail has not received any information during the screening indicating prior sexual victimization. However, per the staff if such a report should be received they would ensure that the inmate is assessed by the Community Services Board Clinician within in 14 days, with additional assessment/evaluation determined by the clinician. These referrals would be documented accordingly. All information relevant to the screening is only shared with staff on a need to know basis. Access to information is available only to the Major, Captain, PREA Coordinator, Classification staff, medical, and clinician.

There were no transgender inmates admitted to the facility within the past twelve (12) months, staff interviews confirmed consideration will be given to the inmate's own views of their safety in placement and programming assignments. However, policy did not indicate such.

After the on-site review, policy updates were required for both 2-1 Classification and 2-9 Transgender to reflect current practices. The PREA Coordinator sent the appropriate supplemental documentation to this auditor demonstrating corrective actions had been taken. All staff were provided with a PREA update PowerPoint of changes during briefing and acknowledged by their signature that they reviewed and understood the updated information/policy. Additionally, an email was sent to all Chesterfield County Jail Staff advising them of the policy, highlighting the specific changes prior to the submission of this report.

Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.

115.42	Use of screening information
	<p data-bbox="252 168 901 201">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 246 526 280">Auditor Discussion</p> <p data-bbox="252 324 1484 784">A review of Chesterfield County Sheriff's Office, Policy 2-1, Classification of Inmates, revised date June 18, 2019; confirms Chesterfield County Jail will utilize an objective jail classification system to achieve our goals concerning the classification of inmates. The goals and objectives of our objective jail classification system are to ensure the public safety by the evaluation of inmates for security risk, escape risk, and overall threat to the general public. To provide for the safety of incarcerated individuals by identifying both predators and their potential victims. To identify those incarcerated requiring medical and mental health services to ensure their proper custody. To determine those incarcerated that are eligible for and would benefit from program opportunities. To determine housing assignment and supervision levels consistent with the above stated goals, maximizing both human and physical plant resources, minimizing the cost to government.</p> <p data-bbox="252 840 1484 1646">Chesterfield County Sheriff's Office, Policy 2-9, Transgender and Intersex Committals, revised date June 24, 2019, Committals that are transgender shall be managed consistent with their gender, including pat searches, strip searches, and housing assignment and: Shall be strip searched by staff of the same gender. Committals will be assigned to housing based on a case-by-case basis. When considering the placement of the housing of a transgender or intersex committal the following factors shall be considered: Identified gender, and Security assessment. Additional Considerations: In deciding whether to assign a transgender or intersex inmate to a housing unit for male or female committals, and in making other housing and programming assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems. Placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety experienced by the inmate. A transgender or intersex inmate's own views with respect to his or her own safety shall be given serious consideration. Transgender and intersex inmates shall be given the opportunity to shower separately from other inmates. The agency shall not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.</p> <p data-bbox="252 1691 1484 1814">An interview with the inmate that identified as being Lesbian, confirmed that she had not be placed in a designated housing unit or area for LGBTI. She indicated that staff interacted with her in professional manner and she felt safe.</p> <p data-bbox="252 1870 1484 2150">The PREA Coordinator and the intake staff interviews described the screening questionnaire. They were able to clearly articulate the screening and assessment process and how that information, along with information derived from medical, records reviews, conversations and observations, is used to determine an inmate's appropriate placement, housing and bed assignments, as well as work, education, and program assignments with the goal of keeping all inmates safe and free from sexual abuse. Additionally, it was communicated via staff that both the PREA standards and Chesterfield County Sheriff's Office prohibits the placement of</p>

gay, bi-sexual, transgender and intersex inmates being placed in a particular housing unit, beds or other assignments based solely on their identification.

Classification information is completed within 24 hours of arrival and the reassessment is conducted within twenty (20) days. An inmate's risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness.

This auditor observed during the tour of the facility that all housing units/pods have single showers, which allows all inmates the privacy to shower separately without other offenders or staff viewing them.

After the on-site review, policy updates were required for both 2-1 Classification and 2-9 Transgender to reflect current practices. The PREA Coordinator sent the appropriate supplemental documentation to this auditor demonstrating corrective actions had been taken. All staff were provided with a PREA update PowerPoint of changes during briefing and acknowledged by their signature that they reviewed and understood the updated information/policy. Additionally, an email was sent to all Chesterfield County Sheriff's Office staff advising them of the policy, highlighting the specific changes prior to the submission of this report.

Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, confirms Chesterfield Jail prohibits the placement of inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.</p> <p>The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days.</p> <p>If an involuntary segregated housing assignment is made, the facility shall clearly document; the basis for the facility's concern for the inmate's safety; and the reason why no alternative means of separation can be arranged.</p> <p>Every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.</p> <p>Per interview with the PREA Coordinator there have been no committals/inmates identified as high risk of victimization requiring placement in restricted housing in the past year. The Jail Administrator (Major) interview indicated that an offender may be placed in involuntary restrictive housing overnight in order to determine an alternative means of separation from potential abusers and/or other housing area. A staff interview who works in restrictive housing confirmed he had not witnessed any committals/inmates placed in involuntary restrictive housing. He indicated if committals/inmates was placed in involuntary segregation for their own protection they would have access to programs, privileges, education and work only if there is no safety concerns. The staff also confirmed during his interview that this information would be documented and reviewed in accordance with policy at least every thirty (30) days by the designated administrators. No were no inmates to interview who were at risk of sexual victimization who were placed in placed in involuntary segregation housing. This was also confirmed via the review of investigation files.</p> <p>After the on-site review, a policy update was required for 3-25, Prison Rape Elimination Act to compliance with the standard and to reflect current practices. The PREA Coordinator sent the appropriate supplemental documentation to this auditor demonstrating corrective actions had been taken. All staff were provided with a PREA update PowerPoint of changes during briefing and acknowledged by their signature that they reviewed and understood the updated information/policy. Additionally, an email was sent to all Chesterfield County Sheriff's Office staff advising them of the policy, highlighting the specific changes prior to the submission of this report.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>



115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, Chesterfield County Jail provides multiple internal ways to report claims of mistreatment to include; Sexual Abuse Hotline *1008#, Request Forms, verbal reports to staff and Chesterfield County Crime Solvers Hotline. These are available for inmates to privately report sexual abuse, sexual harassment, staff neglect or violations of responsibilities that may have contributed to such incidents. Inmates may report sexual abuse or sexual harassment to via the Crime Solver number maintained by the Chesterfield Police Department who is not a part of the Chesterfield Sheriff's Office. Chesterfield Police Department shall receive and immediately forward inmate reports of sexual abuse and sexual harassment to Chesterfield Sheriff's Office, PREA Coordinator. Inmates can report verbally and in writing to staff; dial *1008# to Chesterfield County Police Department hotline; and through a third party.</p> <p>During the facility tour, this auditor tested the hotline (#1008), the test call did not go through. The Captain immediately placed a call to GTL for a service repair. The administration of Chesterfield County Sheriff's Office has purchased some upgrades to the phone system and GTL is still trying to determine the root of the problem as this report was being prepared. The Chesterfield County Sheriff's Office and GTL are working together to provide this reporting mechanism. In spite of the *1008# not working properly there are still multiple ways for reporting of sexual abuse and sexual harassment, and retaliation for reporting sexual abuse and sexual harassment.</p> <p>Staff interviews confirmed they accept allegations of sexual abuse or sexual harassment verbally, in writing, anonymously, and from third parties and immediately report the allegation received to their supervisor and/or the PREA Coordinator. Staff also confirmed during their interviews that they were knowledgeable about their ability to report to the Crime Solver Hotline, as well as their supervisor privately and anonymously.</p> <p>Inmate interviews indicated they were familiar with how to report sexual abuse or sexual harassment. It was also confirmed through the interviews that reporting information was provided during intake, and that this information is posted in the housing areas via PREA posters on how to report.</p> <p>While touring the entire facility, it was observed in each pods' dayroom, the PREA information (posters), PREA/Sexual Abuse Hotline number posted near telephones, flyers with the Chesterfield County Police Department Crime Solvers Number was also posted.</p> <p>Examples of inmate reporting through different means were reviewed when investigative cases were reviewed. Chesterfield Sheriff's Office does not detain solely for civil immigration purposes.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up</p>

documentation, the facility has demonstrated compliance with this standard.

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Chesterfield Sheriff's Office is exempted from this standard because the agency does not have an administrative remedies process to address sexual abuse.

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, requires the agency shall attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the agency shall make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member. Agencies shall document efforts to secure services from rape crisis centers. For the purpose of this standard, a rape crisis center refers to an entity that provides intervention and related assistance, such as the services specified in 42 U.S.C. 14043g(b)(2)(C), to victims of sexual assault of all ages. The agency may utilize a rape crisis center that is part of a governmental unit as long as the center is not part of the criminal justice system (such as a law enforcement agency) and offers a comparable level of confidentiality as a nongovernmental entity that provides similar victim services. As requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals.</p> <p>Chesterfield Sheriff's Office has a MOU with The James House effective August 20, 2015 to provide confidential emotional support services for sexual abuse victims housed within the facility. Chesterfield County Jail provides access to outside victim advocates for emotional support services related to sexual abuse to all inmates by providing both the mailing addresses and telephone numbers for the James House. The James House flyer including the hotline number (*1008#) and mailing address was posted in the housing unit during the audit in both English and Spanish. Per staff interviews, mail to the James House is considered privileged correspondence.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard</p>

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, requires an employee who receives any allegation or information that an inmate is the victim of an incident of sexual abuse, sexual harassment, staff voyeurism or staff neglect must be aware of the sensitive nature of the situation. The inmate must be treated with due consideration for the effects of sexual abuse. Confidentiality is a must and information will only be relayed for investigative purposes. Staff shall accept reports made verbally, in writing, anonymously and from third parties. All verbal reports will be documented promptly once received. Staff is required to report abuse immediately. However, abuse may also be reported anonymously to the Office of Professional Standards or notifying the PREA Coordinator.</p> <p>Chesterfield County Sheriff's Office has a Third Party Reporting Form on the website, which can be completed and submitted electronically. Upon submission of this form, it will be directly emailed to the PREA Coordinator. This auditor viewed the website and confirmed the information regarding third-party reporting. During the on-site visit, information was located in the lobby for the general public as to how they can report sexual abuse and sexual harassment in the jail to the PREA Coordinator by providing his phone number and email address.</p> <p>Staff and investigator interviews confirmed they receive allegations of sexual abuse or sexual harassment from third party reporters and that these are reported to investigators as if an offender made the allegation. Third party assistance includes fellow offenders, family members, attorneys, and outside advocates. Inmate interviews confirmed their awareness of reporting sexual abuse or sexual harassment to others outside of the facility.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and Inmate interviews, and review of documentation the facility has demonstrated compliance with this standard.</p>

115.61	Staff and agency reporting duties
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1481 1301">A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, directs all employees, regardless of title, have a duty to report any sexual contact, sexual abuse, sexual harassment, staff voyeurism, or information regarding inappropriate relationships between an employee and inmate. Such duty to report will include any allegations, knowledge or reasonable belief regarding such conduct. Staff will report any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. All allegations are to be reported regardless of whether supported by medical evidence. Any employee who fails to report such information may be subject to disciplinary action. Staff can privately report sexual abuse and sexual harassment of inmates by submitting an anonymous statement to Professional Standards for investigation. Staff will report any concern for assessment to the PREA Coordinator of any changes in an inmate's risk. The PREA Coordinator along with a medical professional will reassess the inmate's risk of victimization. An employee who receives any allegation or information that an inmate is the victim of an incident of sexual abuse, sexual harassment, staff voyeurism or staff neglect must be aware of the sensitive nature of the situation. The inmate must be treated with due consideration for the effects of sexual abuse. Confidentiality is a must and information will only be relayed for investigative purposes. No reprisals of any kind will be taken against an inmate or employee for good faith reporting of such an incident. Staff shall accept reports made verbally, in writing, anonymously and from third parties. All verbal reports will be documented promptly once received. Staff is required to report abuse immediately. However, abuse may also be reported anonymously to the Office of Professional Standards or notifying the PREA Coordinator. When staff learns that an inmate is subject to a substantial risk of imminent sexual abuse, they shall take immediate action to protect the inmate.</p> <p data-bbox="252 1357 1481 1816">Random staff interviews to include medical staff confirmed the requirement to report any knowledge, suspicion or information of sexual abuse or sexual harassment immediately. Staff confirmed they would notify their supervisor then complete a written report with the details of any incidents that would occur in the facility in compliance with this standard and they are prohibited from sharing information with anyone who is not part of the investigation or reporting process. Interviews with medical staff confirmed their responsibility to inform inmates of their duty to report and limitations of confidentiality. Both the Major and PREA Coordinator indicated that all alleged sexual abuse or sexual harassment reports, regardless of where the information came from, is reported immediately to the investigator. A review of fourteen (14) allegations of sexual abuse and sexual harassment revealed that the investigation began immediately upon receipt of the information.</p> <p data-bbox="252 1872 1481 1939">Chesterfield County Jail does not confine juveniles, nor has there been any incidents involving vulnerable adults.</p> <p data-bbox="252 1995 1481 2114">Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, mandates when staff learns that an inmate is subject to a substantial risk of imminent sexual abuse, they shall take immediate action to protect the inmate.</p> <p>Documentation and interviews with the Jail Administrator (Major) and other randomly selected staff were able to articulate, the steps they would take, upon becoming aware that an inmate may be subject to a substantial risk of imminent sexual abuse. Staff interviews indicated if an inmate were in danger of sexual abuse or at substantial risk of imminent sexual abuse, they would act immediately to ensure the safety of the inmate, separate from the alleged perpetrator and contact their immediate supervisor. The PREA Coordinator interview and the pre-audit questionnaire confirmed there had been no incidents that involved an immediate action to protect an inmate that was a substantial risk of imminent sexual abuse in the past twelve (12) months at the facility.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, mandates upon receiving an allegation that an inmate was sexually abused while confined at another facility, the jail administration will notify the head of the facility or appropriate office of the agency where the alleged abuse occurred. Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation. The incident and notification will be documented, and the department will ensure that the allegation is investigated thoroughly. Any complaint/allegation of mistreatment received from another facility or agency will be investigated in accordance to all PREA standards as outlined above.</p> <p>The PREA Coordinator interview and the documentation confirmed there was one (1) incident reported that an inmate had been sexually assaulted while confined at another facility during the past twelve (12) months. This notification was made by the Major and documented in accordance with policy. Interviews with the Jail Administrator (Major) and Captain indicated their knowledge of both the policy and the standard regarding their responsibilities to report any allegations received regarding another agency and to investigate allegation received from other agencies alleging sexual abuse or sexual harassment occurred at Chesterfield County Jail.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, mandates whenever an employee knows, suspects or receives an allegation from any source regarding inmate-on-inmate sexual abuse or sexual harassment, the employee will immediately separate the alleged victim and abuser. If the employee is non-sworn staff, they will immediately call for security. The employee will preserve the crime scene and notify the shift supervisor/commander. The employee will prohibit the alleged abuser from any action that could destroy physical evidence such as washing, brushing teeth, changing clothes, urinating, defecating, drinking or eating. They should discourage the alleged victim from showering, washing, bathing, douching, drinking, eating, changing clothing, or using the bathroom until examined by a physician.</p> <p>Interviews with the staff and a first responder validated their knowledge and understanding of actions to be taken upon learning that an inmate was sexually abused and provided the action steps identified in the policy of their responsibilities as a first responder and aware of why they do these duties. A review of the training files confirmed that all staff receive information on how to respond to an allegation of sexual abuse in accordance with Chesterfield County Sheriff's Office policy stated above. There has been no staff responding as a first responder to an incident of sexual abuse during the past twelve (12) months.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Interviews with the Jail Administrator and staff confirmed their knowledgeable of their duties to coordinate actions taken in response to an incident of sexual abuse. This auditor reviewed the Facility Action Plan-Responding to incidents of sexual abuse-assault. The plan consisted of systematic guidance for first responders, support staff, medical and mental health, security staff, shift commander, investigator and PREA Coordinator.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>In accordance with the Code of Virginia, collective bargaining is prohibited. Per 40.1-57.2, “no state, county, municipal, or like governmental officer, agent or governing body is vested with or possesses any authority to recognize any labor union or other employee association as a bargaining agency of any public officers or employees, or to collectively bargain or enter into any collective bargaining contract with any such union or association or its agents with respect to any matter relating to them or their employment or service.”</p> <p>Based on the information discovered in the Code of Virginia and interview with the PREA Coordinator, the auditor has determined the facility meets the requirements of the standard.</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, requires the classification lieutenant or designee will promptly monitor possible retaliation from any party that reports or cooperates with an investigation of sexual abuse or sexual harassment. This monitoring will be a minimum of 90 days and shall be continued for a longer period if a continuing need is present. Monitoring will be documented on a CSO-COR-17 and filed with the PREA Coordinator's investigative file. In the case of inmate complainants, they will be placed on seven-day reclassification status. Examples of retaliation to be monitored include but are not limited to inmate disciplinary reports, housing or program changes, and staff performance reviews and reassignments. The department will employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims. Support services for inmates or staff who fear retaliation for reporting or cooperating with investigations of sexual abuse or sexual harassment will be made available upon request. Should the allegation prove to be unfounded, the Sheriff's Office obligation to monitor terminates.</p> <p>An interview with classification lieutenant confirmed he is responsible with overseeing the monitoring of the conduct or treatment of inmates or staff who reported the sexual abuse and of inmates and staff who report retaliation for cooperating with an investigation regarding sexual abuse/sexual harassment. He articulated that he would document thirty (30), sixty (60) and ninety (90) day checks of victims, reporters, and others who express fear of retaliation on the CSO-COR-17 form. Additionally, classification lieutenant confirmed that he would review disciplinary, housing changes, work assignments, and facility disciplinary charges, negative performance reports as well as reassignments of staff during the monitoring process, in addition to speaking with the individual being monitored face to face. .</p> <p>The PRE-Audit Questionnaire indicates indicated there have been no initiate protective measures or monitoring of retaliation during the past twelve (12) months. A review of all fourteen (14) investigation files confirm that staff are monitoring for retaliation in accordance with the standard.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.68	Post-allegation protective custody
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1481 913">A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, confirms Chesterfield Jail prohibits the housing of Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment. The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days. If an involuntary segregated housing assignment is made, the facility shall clearly document; the basis for the facility's concern for the inmate's safety; and the reason why no alternative means of separation can be arranged. Every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.</p> <p data-bbox="252 969 1481 1514">Per interview with the PREA Coordinator there have been no inmates identified as high risk of victimization requiring placement in restricted housing in the past year. The Jail Administrator (Major) interview indicated that an offender may be placed in involuntary restrictive housing overnight in order to determine an alternative means of separation from potential abusers and/or other housing area. A interview with staff who work in restrictive housing confirmed he had not witnessed any inmates placed in involuntary restrictive housing. He indicated if inmates was placed in involuntary segregation for their own protection they would have access to programs, privileges, education and work only if there is no safety concerns. The staff also confirmed during his interview that this information would be documented and reviewed in accordance with policy at least every thirty (30) days by the designated administrators. There were no inmates to interview who were at risk of sexual victimization who were placed in placed in involuntary segregation housing. This was also confirmed via the review of investigation files.</p> <p data-bbox="252 1570 1481 1899">After the on-site review, policy update was required for 3-25, Prison Rape Elimination Act to compliance with the standard and to reflect current practices. The PREA Coordinator sent the appropriate supplemental documentation to this auditor demonstrating corrective actions had been taken. All staff were provided with a PREA update PowerPoint of changes during briefing and acknowledged by their signature that they reviewed and understood the updated information/policy. Additionally, an email was sent to all Chesterfield County Sheriff's Office staff advising them of the policy, highlighting the specific changes prior to the submission of this report.</p> <p data-bbox="252 1955 1409 2074">Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, confirms the Chesterfield Sheriff's Office has a zero-tolerance policy with regard to sexual abuse, sexual harassment, and staff voyeurism. All sexual conduct, including sexual contact, is prohibited. All allegations of sexual abuse, sexual harassment, sexual contact or staff voyeurism will be promptly and thoroughly investigated. The Chesterfield Sheriff's Office shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.</p> <p>If it is determined, through a preliminary investigation conducted by the Sheriff's Office Investigative Unit, that a criminal offense has occurred such as rape, sodomy or any other criminal sexual conduct or attempts, the Sheriff's Office Investigative Unit will forward the information to the Chesterfield County Police Department who will handle the criminal investigation. (See OPR.02.01-04; OPR.03.01- 02; OPR.03.04; OPR.14.01, Preliminary/Follow-Up Criminal Investigations). The preliminary investigation by the Sheriff's Office Investigative Unit will be conducted promptly, thoroughly, and objectively for all allegations including third-party and anonymous reports. This investigation will include an effort to determine whether staff actions or failure to act contributed to the offense, description of the physical and testimonial evidence, reasoning behind credibility assessments, and investigative facts and findings.</p> <p>No standard higher than a preponderance of the evidence will be imposed in determining whether allegations of sexual abuse or sexual harassment are substantiated. No statements will be taken from inmates or employees unless otherwise directed by the lead detective of the Chesterfield Police Department. The shift supervisor/commander will ensure the victim is separated from the alleged perpetrator and brought to medical for both physical and mental evaluation. The department will cooperate with investigations conducted by the Chesterfield Police Department and will remain informed about the progress of the investigation. All reports associated with the allegation will be retained for as long as the alleged abuser is incarcerated or is employed by the department plus five years.</p> <p>A review of Chesterfield County Police Department, Operations Manual, Criminal Investigation 2.3.02, effective 6/21/18, reviewed May 18, 2019, Sexual Assault Investigation-Department members shall assist sexual assault victims in a supportive manner, using appropriate crisis intervention skills. The thorough, complete and accurate collection of evidence is a vital and often key requirement for successful investigation(s) and prosecution of sexual assaults. The primary concern in a rape or sexual assault investigation is to maintain the physical and mental well-being of the victim while obtaining the evidence needed for a successful prosecution.</p> <p>Sexual assault are those offenses involving sexual penetration or sexual contact with any person by force or threat of force, fear, intimidation, ruse, or through the use of a person's mental incapacity or physical helplessness or any other attempts to force sexual penetration/contact on any person.</p>

Department members shall be aware of community services available to victims of sexual assault and make appropriate referrals for additional assistance. Sexual assaults involving juvenile victims, where the offender is a caretaker, shall require a Child Protective Services (CPS) notification if the alleged offense occurred in Chesterfield County, regardless of where the report was made. Department members shall be trained and knowledgeable about sexual assault investigation and its impact on victims. Department members shall provide transportation to sexual assault victims as needed to complete the investigation of such crime.

Documentation review, interviews with an investigator from Chesterfield County Sheriff's Office Professional Standards Department Unit confirmed all four (4) investigators have completed the required specialized investigator training as well as the PREA education. The investigator indicated an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment, regardless of how the information is initially obtained. The Jail Administrator (Major), Investigator and PREA Coordinator confirmed that investigations begin immediately upon notification. The Office of Professional Standards assigns an investigator, who conducts an initial inquiry into the alleged allegation of sexual abuse or sexual harassment, to determine if criminal behavior is involved, at which time the investigation would be referred to Chesterfield County Police Department. Chesterfield County Police Department has the legal authority to conduct criminal investigations. The investigator interview confirmed the credibility of the victim is based on evidence found, and that no polygraph examination or truth-telling device is a condition for proceeding with an investigation. In addition, the investigator confirmed an investigation would not cease until complete, regardless if the alleged perpetrator is released or terminates employment, or if the victim leaves the facility prior to the completion of the investigation. The investigator reported that he would play a support role if the investigation was conducted by Chesterfield County Police Department and he has a great working relationship with investigators within the Chesterfield County Police Department.

A review of the investigation files of alleged staff's or offenders sexual abuse or sexual harassment that occurred within Chesterfield County Jail in the past twelve (12) months contained the required information in accordance policy, procedures and the PREA Standard. There was one (1) substantiated allegation that appeared to be criminal and referred for prosecution in the past twelve (12) months.

Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, confirms no standard higher than a preponderance of the evidence will be imposed in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>Interviews with the Investigator confirmed they investigate the allegation and indicate no standard higher than a preponderance of the evidence will be imposed in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, confirms following the preliminary investigation into an inmate's allegation of sexual abuse, the department will notify the inmate whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. This notification will be coordinated through the PREA Coordinator. In situations that the department did not conduct the investigation, all relevant information will be requested from the investigative agency to inform the inmate. Following an inmate's allegation that a staff member has committed sexual abuse against an inmate the inmate will be informed whenever: the staff member is no longer working in the inmate's section; the staff member is no longer employed at the facility; the department is made aware that the staff member has been indicted on a charge related to sexual abuse within the facility; and the department learns that the staff member has been convicted on a charge related to sexual abuse within the facility. If the allegation is deemed as unfounded by the department, no notification will be required. Following an inmate's allegation that sexual abuse has been committed by another inmate, the department will be informed whenever: the department learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; and the department learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. All notifications or attempted notifications are to be documented. The department's obligation to report shall terminate if the inmate is released from the department's custody.</p> <p>Interviews with both the investigator and the PREA Coordinator confirmed all investigation outcomes whether the allegation is determined to be substantiated, Unsubstantiated or unfounded following an investigation is communicated in writing to the alleged victim. The PREA Coordinator also confirmed he is responsible for this notification and the documentation is maintained with the investigation information.</p> <p>All fourteen (14) investigations files were reviewed that occurred in the past twelve (12) months contained a notification to the victim of the outcome of the investigation.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, confirms staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse. Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.</p> <p>Interviews with the Jail Administrator (Major), Human Resource Manager and documentation review confirmed one (1) contract employee was terminated in the past twelve (12) months for violations of the facility's sexual abuse or sexual harassment policies. All disciplinary sanctions/resignations are maintained in the employee's HR file.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, confirms Any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and shall be reported to the proper law enforcement agency, unless the activity was clearly not criminal, and to relevant licensing bodies. The department will take appropriate remedial measures and will consider whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment by a contractor or volunteer.</p> <p>The PREA Coordinator and Jail Administrator (Major) confirmed there was one (1) allegation reported alleging sexual harassment and sexual abuse against a contractor. Supporting documentation confirms that the contractor was terminated by his employer. In spite of the contractors termination the investigation was turned over to the Chesterfield County Police Department. Chesterfield County Sheriff's Office has requested status update on the investigation; however, during the writing of this report the outcome of the investigation still had not be communicated to Chesterfield County Sheriff's Office.</p> <p>Interviews with contractors and volunteers confirmed were aware of Chesterfield County Sheriff's Office zero tolerance against sexual abuse and sexual harassment and the consequences for engaging in sexual abuse or sexual harassment of inmates.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, confirms Chesterfield County Jail will review and apply disciplinary sanctions for inmates administratively found guilty of sexual abuse, sexual harassment or other forms of sexual misconduct: inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse. Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. The disciplinary process shall consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.</p> <p>The agency may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation. An agency may, in its discretion, prohibit all sexual activity between inmates and may discipline inmates for such activity. An agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced.</p> <p>Documentation review revealed that there have been no administrative findings of guilt for inmate-on- inmate sexual abuse that have occurred at the facility in the past twelve (12) months that resulted in disciplinary action. A review of the investigation reports did not find any substantiated outcomes of sexual abuse or sexual harassment that resulted in disciplinary action taken towards the alleged perpetrator or an alleged victim when it was determined that the allegation was fabricated. An interview with the Jail Administrator (Major) indicated that inmates may also be referred for prosecution if the allegations were criminal.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 2-1, Classification of Inmates, revised date June 18, 2019; confirms Chesterfield County Jail will utilize an objective tool to screen inmates within 72 hours upon arrival. If the PREA questionnaire identifies an inmate as having experienced prior sexual victimization whether in an institution setting or in the community, they will be offered a medical and mental health follow-up meeting within 14 days. Interviews of medical and mental health staff confirmed any information related to sexual victimization or abusiveness that occurred in the institution is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments.</p> <p>During the interviews with the medical and mental health, staff confirmed that although there were no disclosures while conducting risk assessments, all offenders were offered follow-up meetings with medical providers. Also, medical staff confirmed the referral process for inmates who report sexual victimization or are identified as being sexually abusive at intake is reported within fourteen (14) days. Medical staff identified the requirement for informed consent before reporting information about a sexual victimization that did not occur in an institutional setting.</p> <p>Interviews with both the Jail Administrator (Major) and the PREA Coordinator confirmed that inmates under the age of eighteen (18) are not housed at this facility. Documentation review confirmed medical staff conducts intake screening during the initial intake process including informed consent disclosures. There were no inmates who disclosed prior victimization and aggression during their initial screening process within the past twelve (12) months.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, confirms this is applicable to both staff-on-inmate and inmate-on-inmate sexual abuse incidents. The medical provider will prepare a consultation and refer the inmate to St. Mary's Hospital for assessment of the patient and determination whether a forensic evaluation and rape kit is required. Inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant to § 115.62 and shall immediately notify the appropriate medical and mental health practitioners. Inmate victims of sexual abuse while incarcerated shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>Interviews with the medical and mental health staff confirmed that inmate victims of sexual abuse receive timely and unimpeded access to emergency medical treatment and crisis intervention services. The medical and mental health staff indicated that services begin immediately upon notification of a victim of sexual abuse from the shift supervisor. The shift supervisor will ensure that the inmate is immediately escorted to medical for an evaluation and/or transport to St. Mary's Hospital for forensic examination. Also, the medical staff's interview indicated the medical provider would prepare a consultation and refer the inmate to St. Mary's Hospital for assessment of the patient and determination whether a forensic evaluation and rape kit is required and to begin any sexually transmitted infection prophylaxis treatment/services and orders for follow-up services. Upon completion of the inmate's physical examination by the local hospital and upon return to the jail, a mental health evaluation will be performed to determine the potential for suicidal ideation and/or the need for more in depth psychiatric intervention or treatment. At this time, the mental health clinician will determine whether the inmate may require crisis intervention counseling, and will ensure that it is provided, if it is deemed necessary.</p> <p>In the past 12 months, there had been no allegations where a victim required a forensic medical examination at the facility.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1484 1429">A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, confirms all victims of sexual abuse are offered access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The agency shall document its efforts to provide SAFEs or SANEs. Inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant to § 115.62 and shall immediately notify the appropriate medical and mental health practitioners. Inmate victims of sexual abuse while incarcerated shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Upon completion of the inmate's physical examination by the local hospital and upon return to the jail, a mental health evaluation will be performed to determine the potential for suicide ideation and/or the need for more in depth psychiatric intervention or treatment. At this time, the mental health clinician will determine whether the inmate may require crisis intervention counseling, and will ensure that it is provided, if it is deemed necessary. All inmates who make a sexual allegation will be seen and offered counseling every thirty (30) days until discharged from the Chesterfield Sheriff's Office custody, regardless of whether they recant their allegation.</p> <p data-bbox="252 1485 1476 1899">Interviews with the medical and mental health staff confirmed that victims are offered a sexual assault assessment, individual counseling, medication as ordered by the physician, testing for STD and HIV and follow-up. The mental health counseling would also be offered via the Community Services Board clinician, which could include individual or group treatment, including trauma resolution as well as follow-up. Mental health staff would conduct mental health evaluations of all known offender-on- offender abusers and offer treatment services within fourteen (14) days. There have been no allegations of alleged offender's sexual abuse that occurred in this facility in the past twelve (12) months. The medical and mental health staff have a protocol in place to assist inmates upon discharge from the facility to continue services if needed.</p> <p data-bbox="252 1955 1409 2078">Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, confirms the department will conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded. The incident review will occur within 30 days of the conclusion of the incident. The incident review team will include department administration with input from front line supervisors, investigators, and medical or mental health practitioners. The incident review team shall: consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; consider whether the incident or allegation was motivated by race, ethnicity, gender identity, lesbian, gay, bisexual, transgender, intersex identification, status, perceived status, gang affiliations, or was motivated or otherwise caused by other group dynamics within the facility; examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in the area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and prepare a report of its findings, including but not necessarily limited to determinations made in this section, and any recommendations for improvement and submit such report to the sheriff and classification lieutenant. The department shall implement the recommendations for improvement, or shall document its reasons for not doing so.</p> <p>An interview with an administrative staff and documentation review of the investigation reports confirmed that a Sexual Abuse Incident Review Form is prepared upon completion of sexual abuse or sexual harassment investigations. The Incident Review consists of: policy or procedure requiring revision, motivation for incident or allegation, assessment physical barriers in the area; adequacy of staffing levels and assessment of monitoring technology and recommendation for improvements. The Incident Review Team consisted of the Captain, PREA Coordinator, line staff supervisor, investigator, and medical. The facility reported fourteen (14) criminal and/or administrative investigations of alleged sexual abuse or sexual harassment that occurred in this facility in the past twelve (12) months. Staff interviews confirmed their knowledge of the process and would document their review on the Sexual Abuse Incident Review Form that captures all aspects of an incident.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, confirms the department will collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. The incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. The department will aggregate the incident-based sexual abuse data at least annually. The department will maintain, review, and collect data as needed from all available incident based documents, including reports, investigation files, and sexual abuse incident reviews. The department also shall obtain incident based and aggregated data from every private facility with which it contracts for the confinement of its residents. Upon request, the department will provide all such data from the previous calendar year to the Department of Justice no later than June 30.</p> <p>Documentation review of Chesterfield County Sheriff's Office 2018 Annual Report revealed comprehensive information about PREA, to include statistical data regarding reports of sexual abuse and sexual harassment, were included.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, confirms the department will review data collected and aggregated in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including: identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of findings and corrective actions. The report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse. The report will be approved by the Sheriff and made readily available to the public on our website. The department may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the jail but must indicate the nature of the material redacted.</p> <p>An interview with the PREA Coordinator revealed that information is gathered and submitted to the public through an annual report that is available on the website, and includes comparison data and any facility modifications or agency policy changes. Also, the PREA Coordinator reports that all information collected from an incident review is forwarded to Jail Administrator (Major) for review and or approval. The Jail Administrator (Major) confirmed that information obtained during the incident reviews are used to enhance the PREA program to prevent, detect and respond to incidents of sexual abuse and sexual harassment.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Chesterfield County Sheriff's Office, Policy 3-25.1, Prison Rape Elimination Act, revised date June 24, 2019, confirms the department will ensure that sexual abuse data collected are securely retained. All aggregated data from private facilities that are contracted by the department will be made readily available to the public at least annually through our website. Before making aggregated sexual abuse data publicly available, the agency shall remove all personal identifiers. The department will maintain sexual abuse data collected for at least ten (10) years after the date of the initial collection unless federal, state, or local law requires otherwise.</p> <p>The aggregated sexual abuse data was reviewed and all personal identifiers are removed. Chesterfield County Sheriff's Office 2018 Annual Report is posted on the Chesterfield County Sheriff's Office website and readily available for public review.</p> <p>An interview with the PREA Coordinator reported that all information is securely maintained in an area where only the PREA Coordinator, Captain and Major has access.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This auditor reviewed Chesterfield County Sheriff's Office web page at https://www.chesterfield.gov containing the 2016 PREA Audit Report for the one facility operated by Chesterfield County Sheriff's Office. This facility was audited in the third year of the first audit cycle. This auditor had access to the entire facility and was able to conduct staff and inmate interviews in a private room and provided with documentation in accordance to the standard. Inmates were permitted to send confidential information or correspondence to this auditor, the same method as sending to their legal counsel. Posters (pre-audit notices) for communicating to the auditor were in all areas of the facility.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This auditor reviewed Chesterfield County Sheriff's Office web page at https://www.chesterfield.gov containing the 2016 PREA Audit Report for the one facility operated by Chesterfield County Sheriff's Office. The audit report was published within 90 days after the final report was issued by the auditor.</p>

Appendix: Provision Findings

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

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

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

115.12 (a)	Contracting with other entities for the confinement of inmates	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	no

115.12 (b)	Contracting with other entities for the confinement of inmates	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates OR the response to 115.12(a)-1 is "NO".)	na

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

	consideration the number and placement of supervisory staff in calculating adequate staffing levels and determining the need for video monitoring?	
	Does the agency ensure that each facility's staffing plan takes into consideration the institution programs occurring on a particular shift in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any applicable State or local laws, regulations, or standards in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the prevalence of substantiated and unsubstantiated incidents of sexual abuse in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any other relevant factors in calculating adequate staffing levels and determining the need for video monitoring ?	yes

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

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

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

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

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

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

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

115.15 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates in non-exigent circumstances? (N/A here for facilities with less than 50 inmates before August 20,2017.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A here for facilities with less than 50 inmates before August 20,2017.)	yes

115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates?	yes

115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility implement a policy and practice that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes

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

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

115.16 (a)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all	yes

	aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes

115.16 (b)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes

115.16 (c)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes

115.17 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes

115.17 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates?	yes

115.17 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with inmates, does the agency: perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency: consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes

115.17 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes

115.17 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes

115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does such publication describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes

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

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

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

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

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

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

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

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

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

115.33 (c)	Inmate education	
	Have all inmates received such education?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes

115.33 (d)	Inmate education	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes

115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes

115.33 (f)	Inmate education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes

115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

115.34 (b)	Specialized training: Investigations	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

115.34 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment?	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse?	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment?	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment?	yes

115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams.)	no

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

115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31?	yes
	Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.32?	yes

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

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

115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	no

115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: history of prior institutional violence or sexual abuse?	yes

115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a: Referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Request?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes

115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

115.51 (b)	Inmate reporting	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security?	no

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

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

115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no

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

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

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

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

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

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

115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies?	yes
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes

115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes

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

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

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

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

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

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

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

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

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

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

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

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

115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes

115.64 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes

115.65 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes

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

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

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

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

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

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

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

115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes

115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	no
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	no

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

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

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

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

115.403 (f)	Audit contents and findings	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports within 90 days of issuance by auditor. The review period is for prior audits completed during the past three years PRECEDING THIS AGENCY AUDIT. In the case of single facility agencies, the auditor shall ensure that the facility's last audit report was published. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or in the case of single facility agencies that there has never been a Final Audit Report issued.)	yes