

# PREA Facility Audit Report: Final

**Name of Facility:** Worcester County Jail

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 06/02/2017

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Jeff Kovar	<b>Date of Signature:</b> 06/02/2017

AUDITOR INFORMATION	
<b>Auditor name:</b>	Kovar, Jeff
<b>Address:</b>	
<b>Email:</b>	jeff@preaauditing.com
<b>Telephone number:</b>	
<b>Start Date of On-Site Audit:</b>	04/27/2017
<b>End Date of On-Site Audit:</b>	04/28/2017

FACILITY INFORMATION	
<b>Facility name:</b>	Worcester County Jail
<b>Facility physical address:</b>	5022 Joyner Road, Snow Hill, Maryland - 21863
<b>Facility Phone</b>	
<b>Facility mailing address:</b>	P.O Box 189, Snow Hill, Maryland - 21863
<b>The facility is:</b>	<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
<b>Facility Type:</b>	<input type="radio"/> Prison <input checked="" type="radio"/> Jail

Primary Contact			
<b>Name:</b>	Donna Bounds	<b>Title:</b>	Assistant Warden
<b>Email Address:</b>	dbounds@co.worcester.md.us	<b>Telephone Number:</b>	410-632-1300

Warden/Superintendent			
<b>Name:</b>	Garry L. Mumford	<b>Title:</b>	Warden
<b>Email Address:</b>	gmumford@co.worcester.md.us	<b>Telephone Number:</b>	410-632-1300

Facility PREA Compliance Manager			
<b>Name:</b>		<b>Email Address:</b>	

Facility Health Service Administrator			
<b>Name:</b>	Muriel Copening	<b>Title:</b>	HSA
<b>Email Address:</b>	mcopening@correctcaresolutions.com	<b>Telephone Number:</b>	410-632-1300

Facility Characteristics			
<b>Designed facility capacity:</b>	500		
<b>Current population of facility:</b>	352		
<b>Age Range</b>	Adults: 18-73	Youthful Residents: 17-18	
<b>Facility security level/inmate custody levels:</b>	medium		
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	102		

AGENCY INFORMATION	
<b>Name of agency:</b>	Worcester County Jail
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	5022 Joyner Road, Snow Hill, Maryland - 21863
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

Agency Chief Executive Officer Information:			
<b>Name:</b>		<b>Title:</b>	
<b>Email Address:</b>		<b>Telephone Number:</b>	

<b>Agency-Wide PREA Coordinator Information</b>			
<b>Name:</b>	Donna Bounds	<b>Email Address:</b>	dbounds@co.worcester.md.us

## 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.

A Prison Rape Elimination Act Audit of Worcester County Jail was conducted from April 27-28, 2017. The purpose of the audit was to determine compliance with the Prison Rape Elimination Act standards which became effective August 20, 2012.

The auditor wishes to extend his appreciation to Acting Warden/PREA Coordinator Donna Bounds and her staff for the professionalism they demonstrated throughout the audit and their willingness to comply with all requests and recommendations made by the auditor.

The auditor provided the facility with a Notification of Audit which was posted in all housing units and throughout the facility six weeks before the onsite portion of the audit. The notification contained information on the upcoming audit and stated that any inmate with relevant information related to the facility's compliance with the U.S. Department of Justice PREA standards should mail the auditor at least 10 days prior to the onsite audit date (April 27, 2017). During the facility tour, the auditor observed the posting in all housing areas and throughout the facility.

On February 9, 2017, the Acting Warden/PREA Coordinator received access to the PREA Online Audit System and began completion of the pre-audit questionnaire. The Acting Warden/PREA Coordinator uploaded all documentation relevant to the audit. On March 8, 2017, the auditor received notification that the pre-audit questionnaire was complete and all relevant documentation was uploaded. At that time, the auditor reviewed the pre-audit questionnaire and relevant documentation, and created a list of follow-up questions and a list of additional documentation that was needed. Approximately two weeks prior to the onsite audit, the auditor provided this list to the Acting Warden/PREA Coordinator and requested this information. During the onsite audit, the auditor took additional notes and requested additional information from the facility. Within four weeks after the onsite audit, the Acting Warden/PREA Coordinator provided the auditor with responses to all follow-up questions as well as supporting documentation for the responses.

An entrance meeting was held with the following persons: Acting Warden/PREA Coordinator- Donna Bounds and Colonel Fulton Holland.

After the entrance meeting on the first day of the onsite audit, the auditor was given a tour of all areas of the Worcester County Jail, including: all housing units, control centers, visitation, strip search room/storage area, holding cells, detox cells, Inmate Processing, female strip search area, Female Work Release, Male Work Release, programs room, classrooms, laundry rooms, gymnasium, medical, commissary, special housing, administrative segregation, outside recreation yard, fresh air yard, sally port, intake, classification, kitchen, and camera room. During the tour, the auditor conducted informal interviews with staff and inmates.

One day one of the site visit, the auditor was provided with staff rosters and housing unit rosters. The auditor randomly selected inmates and staff from these rosters, to be interviewed.

A total of 31 staff were interviewed with at least one staff member interviewed from each interview category that was applicable to the facilities. Staff interviews were conducted on staff from all three shifts.

A total of 24 inmates were interviewed with at least one inmate interviewed from each interview category that was applicable to the facility.

All interviews were conducted one at a time in a private and confidential manner.

Telephone interviews were conducted with the SAFE/SANE.

The count on the first day of the audit was 334. The count on the final date of the audit was 338.

Throughout the pre-audit and onsite audit, open and positive communication was established between the auditor and facility staff. During this time, the auditor discussed his concerns with Acting Warden/PREA Coordinator Donna Bounds. All concerns were addressed to the satisfaction of the auditor prior to the completion of the Final Report.

When the audit was completed, the auditor conducted an exit briefing on April 28, 2017. The auditor gave an overview of the audit and thanked the staff for their hard work and commitment to the Prison Rape Elimination Act.

After the onsite audit, the auditor utilized the Auditor Compliance Tool for Adult Prisons and Jails as a guide in determining compliance with each standard, and created a Final Report documenting the facility's compliance. In order to determine compliance, the auditor used the information and documentation provided during the pre-audit, onsite documentation review, information obtained through inmate and staff interviews, as well as visual observations during the facility tour.

## AUDIT FINDINGS

### Facility Characteristics:

The auditor's description of the audited facility should include details about the type of the facility, 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 Worcester County Jail originally opened in April 1982. It is a single story building of concrete and brick construction situated on seven acres of land in Snow Hill, Worcester County, Maryland.

A security fence topped with razor ribbon, a vehicular sally port, and a perimeter road surrounds the facility. Entry is gained through a spacious lobby with two secure doors controlled by the administration. Visitors are received here, where there is access to eight non-contact stations for general visitation, and four booths for private attorney visits. There are vending machines in this area, as well as restrooms for visitors. A separate door secures the administrative section, which is enclosed by glass partitions providing easy viewing of all entrants into the building. In this area are the Warden's office, Warden's secretary's office, Assistant Wardens' offices, conference room, armory, enclosed areas for the secretarial staff, inactive file room, staff lavatories, a small coffee area, and a roll call area.

Entry into the secure section of the facility is gained through a security door/sally port and a grille controlled by central control. Central Control is located in the middle of the corridor with the officer's break room, kitchen, medical, booking/intake and classification in surrounding areas.

There are three corridors separated by grille gates that lead to the inmate housing areas. A secure gate and sally port affords entry into the five medium security housing units, which consist of sixteen cells with eight on each of two levels; a large dayroom with a wall mounted television; collect call telephones, three or four steel tables with attached benches; and a stainless steel toilet. Each cell has two beds attached to the wall, a combination stainless steel toilet, fountain and wash-basin unit, steel mirror, louvered screened windows, and sliding doors with food passes and view windows. There is one shower on each of the two levels. One of the units is used primarily for trustees and minimum-security inmates. Entry into maximum-security housing is gained the same as medium, consisting of two sections of cells used with bar front sliding doors, equipped similarly to the other cells previously mentioned. Each of the cells is used for intake, pending initial classification, while six are reserved for maximum-security inmates. There is a shower and an adjoining dayroom with a steel table and attached benches for each unit. The maximum-security side has a stainless steel toilet and collect-call only telephones. A security corridor encircles these units. There is also a special management unit with nine cells having two beds and similar equipment as the other cells.

A minimum-security living unit within the facility contains fourteen cubicles with seven on each of two levels and a large adjoining dayroom. There are thirty-two unattached single and bunked beds arranged in dormitory style. There is one shower and a common lavatory with a stainless steel urinal and toilet, fountain and washbasin unit on each level. The large dayroom has four long tables with attached benches.

The female housing area has two units consisting of five medium security cells with a small adjacent dayroom, a collect call telephone, steel table with attached benches, and a toilet and a shower. The cells contain two attached beds, a combination stainless steel toilet, a fountain and wash basin unit, a steel

mirror, screened windows and solid sliding doors. There are two maximum-security cells with two bunked beds, which are currently being utilized to house work release females and a processing/intake area. A small outdoor recreation area is also provided.

In addition to the permanent housing, there are short-term holding areas for special management inmates. There are two cells for disciplinary detention, which have only one attached bed. There is a medical isolation cell with a cement slab bed, a small adjacent holding room with two beds attached to the wall and a large holding cell with benches and porcelain fixtures located in the booking and processing area. Both the special management and female housing units have a cell for physically challenged inmates.

The facility also has: a well-stocked library, commissary, chapel, a large and well equipped multi-purpose indoor exercise area, spacious outdoor exercise area, laundry with three commercial washers and dryers, staff locker rooms, several maintenance areas (e.g. boiler, emergency generator, etc.) and janitorial closets.

A 12,650 square foot building for work release inmates opened in July 2000. This is a sectional addition consisting of an A & B side, each housing thirty inmates. Side A is for work release and Side B is for County workers. Entrance is gained via an enclosed fenced walkway. Although this is a separate building, there is a door that connects to the main facility. It has its own dedicated control center, office, visiting, storage, and laundry areas. The activity space on each side contains four dining tables and four telephones. The lower levels have twelve wall-mounted bunks and the upper levels have eighteen wall-mounted bunks. The toilet facilities on each side include four showers, three urinals, three commodes, and three stainless steel basins. Also located on the lower level are two multipurpose rooms used for various programs.

The facility possesses a comprehensive and modern security system including: automated doors with alarms; nineteen strategically placed cameras; two digital video recorders which are capable of playback view and copy; a central control station with two video screens; sophisticated communications; audio monitoring devices, and numerous safety vehicles.

In May 2010, a 64,000 square foot annexation and addition was completed at the Worcester County Jail. During this project, the entire camera system and intercom system were upgraded. A new enclosed, three vehicle, secured sally port was added which has become the main entrance for inmate traffic. This sally port leads into a new processing area which is flanked by a male holding bullpen and seven holding cells (2 persons each) on one side, and a female holding bullpen and two holding cells (2 persons each) on the other side. This area includes a male and female (respectively) strip search area, property issue area and a shower area. Included in this addition was a new entrance for visitors which include additional visitor's booths. A new boiler room was constructed to provide oil fired boilers to produce both heat and domestic hot water for the new additional 64,000 square feet. This boiler room also houses a new additional power generator and a UPS system for the new construction area.

This new building includes three additional large housing units, one thirty-two inmate female work release unit, four smaller housing units for female inmates, three new detox units, four medical units attached to a new medical wing consisting of four offices, a store room, janitor's closet and a holding cell for inmates waiting to be examined and two additional administrative segregation units. Also included in this addition is a large, dividable classroom, supervisor's office, new staff lounge, new library, two group meeting rooms and a video court room. A new multipurpose/inside recreation area was constructed as well as a



new outside recreation area.

Each of the major housing units on the old side as well as the new side now have outside fresh air yards attached to them. Three new control centers were constructed, (1) Control Center #2 capable of duplicating the functions of the main control center; (2) Control Center #3 which controls the new processing/sally port area and (3) Control Center #4 which controls the female work release area. The entire jail is now surrounded by a sixteen foot high security fence which is capped with security razor wire with security entrances on the east side as well as the west. The annexation of the jail added a staff/officer meeting room, male and female locker rooms, a large training/conference room, additional administrative offices and a new larger walk-in refrigerator and freezer.

All the above additions now bring the total square footage of the Worcester County Jail to 135,000 square feet.

## 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.

<b>Number of standards exceeded:</b>	2
<b>Number of standards met:</b>	43
<b>Number of standards not met:</b>	0

After reviewing all information provided during the pre-audit and onsite audit, staff and inmate interviews, as well as visual observations made by the auditor during the facility tour, the auditor has determined the following:

Number of standards exceeded: 2  
(115.11 and 115.14)

Number of standards met: 43  
(115.12, 115.13, 115.15, 115.16, 115.17, 115.18, 115.21, 115.22, 115.31, 115.32, 115.33, 115.34, 115.35, 115.41, 115.42, 115.43, 115.51, 115.52, 115.53, 115.54, 115.61, 115.62, 115.63, 115.64, 115.65, 115.66, 115.67, 115.68, 115.71, 115.72, 115.73, 115.76, 115.77, 115.78, 115.81, 115.82, 115.83, 115.86, 115.87, 115.88, 115.89, 115.401, and 115.403)

Number of standards not met: 0

## Standards

### Auditor Overall Determination Definitions

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

### Auditor Discussion Instructions

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

115.11	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 133) 3. The Worcester County Jail has a zero tolerance stance towards all forms of sexual abuse and harassment against any inmate/detainee in its custody by another inmate/detainee or by Worcester County Jail staff or staff licensed or contracted professionals providing service to the inmate/detainee population.</p> <p>(Page 145-149) outlines how the facility will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment.</p> <p>(Page 134-137) includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment.</p> <p>(Page 150) includes sanctions for those found to have participated in prohibited behaviors.</p> <p>(Page 140) includes a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of inmates.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The agency employs or designates an upper-level, agency-wide PREA Coordinator. This position holds the rank of Security Colonel. This was verified by the Agency Organizational Chart. At the time of the audit, the PREA Coordinator was also the Acting Warden. The Acting Warden/PREA Coordinator has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities.</p> <p>The agency does not have a PREA Compliance Manager. Since the agency has a single facility, a PREA Compliance Manager was not required.</p> <p>During the audit tour, the auditor discovered zero tolerance education posted throughout the facility, magnifying the agency's zero tolerance approach towards sexual abuse and sexual harassment.</p> <p>Staff and Inmate Interviews</p> <p>During the interview with the Acting Warden/PREA Coordinator, the auditor confirmed she had sufficient time to manage her PREA related responsibilities. If she identifies an issue with complying with a particular PREA standard, she would develop an action plan and see to it that the action plan was implemented.</p> <p>During interviews with random staff, numerous staff were extremely knowledgeable of the</p>

PREA standards as well as the agency's policies and procedures.

During interviews with random inmates, numerous inmates were extremely knowledgeable of the PREA standards. Numerous inmates spoke highly of the staff and the facility. The zero tolerance culture was visible throughout the entire audit process.

#### Final Determination

Based on the information listed below, the auditor has determined the agency/facility exceeds the above standard:

\*During the audit tour, the auditor discovered zero tolerance education posted throughout the facility, magnifying the agency's zero tolerance approach towards sexual abuse and sexual harassment.

\*During interviews with random staff, numerous staff were extremely knowledgeable of the PREA standards as well as the agency's policies and procedures.

\*During interviews with random inmates, numerous inmates were extremely knowledgeable of the PREA standards. Numerous inmates spoke highly of the staff and the facility. The zero tolerance culture was visible throughout the entire audit process.

115.12	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>N/A</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>Worcester County Jail renewed an agreement to house its inmates at Wicomico County Detention Center. The renewal was signed January 4, 2017. The renewal states Wicomico Detention Center is working toward PREA Compliance in 2017 and is acknowledging future compliance with the PREA standards. Wicomico County Detention Center went through a PREA assessment in November 2017. This was conducted by the Moss Group.</p> <p>Worcester County Detention Center has not entered into or renewed any other agreements for the confinement of its inmates. No inmates from Worcester County Jail were housed at Wicomico County Detention Center at the time of the auditor. The auditor was advised this housing contract would only be used in extreme emergencies.</p> <p>Staff and Inmate Interviews</p> <p>During an interview with the Agency Contract Administrator, the auditor confirmed the agency has a housing contract with Wicomico County Detention Center. The Agency Contract Administrator advised she regularly monitors this agency's progress towards PREA compliance. The Agency Contract Administrator provided a copy of Wicomico County Detention Center's PREA Assessment Report showing their progress. The auditor was advised Wicomico County Detention Center was planning on going through their PREA audit in 2017.</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>

115.13	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Security and Custody Staff Requirements states:</p> <p>The Security and Custody Staff are required to maintain a safe and humane environment for all inmate and detainee residents, staff and to protect the community. In order to maintain the security and safety of the facility for the residents, staff, professional providers and the community the facility will establish a minimum number of Correctional Officers for each shift. This minimum number is established based on the number of assigned posts and activities occurring during the particular shift. This minimum number is subject to revision based on the increased need to complete the mission of the facility safely.</p> <p>Midnight Shift- A minimum number of 10 Correctional Officers</p> <p>Day Shift- A minimum number of 14 Correctional Officers</p> <p>Evening Shift- A minimum number of 12 Correctional Officers</p> <p>If a shift is depleted due to illness or other unanticipated reasons(s); an officer or officers will be selected to work a minimum of 4 hours up to an 8 hour shift to ensure the facility is safe.</p> <p>The Viacom video camera system in Control Center 1 will monitor the facility 24 hours a day. Control Center Officers will monitor the camera during the assigned shift to prevent abuse to any and all inmate/detainee residents.</p> <p>Staffing requirements are reviewed annually by the Warden and subject to change as needed.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The auditor was provided with staffing plans from 2016 and 2017.</p> <p>The average daily number of inmates since the last PREA Audit is 335, which is the same number in which the staffing plan was predicated. In the past 12 months, there have not been any deviations from the staffing plan.</p> <p>At least once every year the facility/agency, in collaboration with the PREA Coordinator, reviews the staffing plan to see whether adjustments are needed to: (a) the staffing plan, (b) the deployment of monitoring technology, or (c) the allocation of facility/agency resources to commit to the staffing plan to ensure compliance with the staffing plan.</p> <p>The facility requires intermediate-level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. The auditor was provided with documentation showing intermediate-level or higher-level staff conduct unannounced rounds</p>

occur on all three shifts.

The facility prohibits staff from alerting other staff of the conduct of such rounds.

#### Staff and Inmate Interviews

During the interview with the Acting Warden/PREA Coordinator, the auditor confirmed the facility has a staffing plan. Adequate staffing levels to protect inmates against sexual abuse is considered in this plan. The staffing plan establishes a mandatory, minimum number of staff for each shift. The facility does not ever deviate from the staffing plan and utilizes mandatory overtime to staff any vacant positions, when needed. Video monitoring is also part of the staffing plan which is documented in policy. Supervisors have been made aware of the minimum staffing levels and ensure compliance with the staffing plan. The Warden also reviews the post assignments a regular basis in order to ensure compliance. When assessing adequate staffing levels and the need for video monitoring, the facility staffing plan considers all aspects of 115.13. The staffing plan review consists of the Warden and two Assistant Wardens reviewing all aspects of 115.13. There have been no instances of non-compliance with the staffing plan, due to the fact that the facility uses mandatory overtime to fill unstaffed positions.

During interviews with intermediate and higher-level staff, the auditor confirmed supervisors are constantly making unannounced rounds. These rounds occur on all three shifts. These rounds are documented on the security round sheet. Supervisors conduct their rounds in a sporadic manner, in order to ensure they are random and unannounced. Security staff have been made aware of the agency policy prohibiting staff from announcing supervisor rounds.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.14	<b>Youthful inmates</b>
<b>Auditor Overall Determination:</b> Exceeds Standard	
<b>Auditor Discussion</b>	
<p>Supporting Policies</p> <p>PREA Policy Standard 05 states:</p> <p>10. Housing for Juveniles</p> <p>The Worcester County Jail will maintain the care of custody of inmates under the age of 18 only if the inmate has been waived to adult status by the Circuit Court and a copy of the waiver is received, or if the offense the inmate is charged with is an automatic waiver to adult status as defined by the Maryland Criminal Code. The Worcester County Jail will not hold Immigration and Custody Enforcement detainees under the age of 18.</p> <p>The architectural design of the facility restricts the ability to place juveniles in general population units and, therefore, the juveniles will be placed in a housing unit that is on a dayroom schedule and under the direct supervision of correctional staff.</p> <p>Male inmates under the age of 18 will be housed in the cells by themselves in O block housing which allow the juvenile to be alone during shower time and dayroom time. During the recreation period, the juvenile is under the direct supervision of correctional staff.</p> <p>Female inmates under the age of 18 will be housed in the cell by themselves in Q Block which allows the juvenile to be alone during shower time and dayroom time. During the recreation period, the juvenile is under the direct supervision of correctional staff.</p> <p>The Worcester County Jail prohibits placing Juveniles (Youthful offenders) in a housing unit in which the juvenile (youthful offender) will have sight, sound, or physical contact with any adult inmate/detainee.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>From January 2016 to January 2017 the Worcester County Jail held 3 youthful offenders for an average of 77 days incarceration.</p> <p>In the past 12 months, the number of youthful inmates who have been placed in isolation in order to separate them from adult inmates: 0</p> <p>Staff and Inmate Interviews</p> <p>During an interview with Line Staff who Supervise Youthful Inmates, the auditor was advised the facility is able to maintain sight and sound separation between youthful and adult inmates. There have not been any circumstances in the past 12 months when sight and sound separation requirements have been difficult to achieve. Male Youthful inmates are housed in "O3" housing unit. No adult inmates can see or communicate with the youthful inmates housed</p>	



in this housing unit. In areas outside the housing unit, the facility always provides direct staff supervision. Youthful inmates are never placed in solitary confinement in order to comply with the requirement of sight and sound separation from adult inmates.

During an interview with Education Staff who work with Youthful Inmates, the auditor confirmed sight and sound separation between youthful and adult inmates does not interfere with the youthful inmates' regular participation in programs. The auditor was advised there is always direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact.

At the time of the audit, there were not any Youthful Inmates housed at the facility.

#### Final Determination

Based on the information the information listed below, the auditor has determined the facility exceeds the above standard:

\*Auditor notated the facility rarely houses youthful inmates and has limited housing units, but has designated housing units for both male and female youthful offenders. The design of the housing units and facility policy ensures youthful inmates are never housed with adult inmates. Numerous staff were well aware that youthful inmates should only have contact with adult offenders in areas outside of the housing unit, and only when under direct staff supervision. The auditor has determined the facility is maximizing the use of it's housing units, thus has listed standard 115.14 as exceeds standards.

115.15	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 141)</p> <p>11. Limits on Cross-Gender Viewing and Searches</p> <p>The Worcester County Jail will not strip search or physically examine a transgender or intersex inmate/detainee for the sole purpose of determining the inmate's/detainee's genital status.</p> <p>The Worcester County Jail will conduct pat searches and strip searches of the inmate/detainee population by a member of the same sex as the offender.</p> <p>Members of the opposite gender will announce their presence upon entering the living areas of the inmate/detainee population.</p> <p>Special care will be taken to ensure a strip search of a transgender inmate/detainee be performed in a private setting.</p> <p>Worcester County Jail Strip Search Procedures states:</p> <p>Pat Searches</p> <ul style="list-style-type: none"> <li>* Male correctional officers are responsible for conducting pat-searches of male inmates/ detainees. Male correctional officers are prohibited from conducting pat-down searches of female inmates/ detainees.</li> <li>* Correctional Staff shall document all cross-gender pat down searches of female inmates/ detainees in an incident report and forward this report to the PREA Coordinator. Correctional Staff shall not restrict female inmates'/detainees' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision.</li> <li>* Female correctional officers are responsible for conducting pat searches female inmates/detainees. All pat-down searches will be conducted in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.</li> <li>* Correctional officers shall be aware of their comments and reframe from making comments that could be deemed inappropriate, specifically making comments sexual in nature.</li> </ul> <p>Strip Searches</p> <ul style="list-style-type: none"> <li>* Male correctional officers shall only strip search males.</li> <li>* Female correctional staff shall only strip search females.</li> <li>* Correctional Staff is prohibited from conducting cross-gender strip searches or cross-gender body cavity searches, except in exigent circumstances. An example of an exigent circumstance would be a staff member of the opposite sex responding to an actively combative inmate who is being strip searched, and an immediate response is required to prevent a potential assault to another staff member. All cross gender pat down searches of</li> </ul>

female inmates will be documented in an incident report and forward the report to the PREA Coordinator.

\* Correctional Staff is prohibited from physically examining a transgender or intersex inmate for the sole purpose of determining the inmate's/ detainee's genital status. If the inmate's/ detainees genital status is unknown, it may be determined during conversations with the inmate/ detainee, by reviewing medical records, or if necessary, by learning information as part of a broader medical examination conducted in private by a medical practitioner. If there is ever any question, contact a supervisor and/or medical personnel.

\* Staff shall be aware of their comments and reframe from making comments that could be deemed inappropriate, specifically making comments sexual in nature.

#### Additional Documentation/Observations from Facility Tour

In the past 12 months, the number of cross-gender strip or cross-gender visual body cavity searches of inmates: 0

The number of pat-down searches of female inmates that were conducted by male staff: 0

The facility does not restrict female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision.

No transgender or intersex inmates have been searched for the sole purpose of determining their genital status.

The percent of all security staff who received training on conducting cross-gender pat-down searches and searches of transgender and intersex inmates in a professional and respectful manner, consistent with security needs: 100%

During the tour, the auditor discovered tinted glass on the outer windows of the female housing units, thus restricting the ability for male staff to look into the female housing unit while walking down the hallway.

#### Staff and Inmate Interviews

During interviews with random staff, the auditor determined staff were unfamiliar with the agency's policy regarding transgender searches. The auditor discussed this with the Acting Warden/PREA Coordinator, and requested the facility implement clearer guidelines regarding transgender searches. Prior to the completion of the Final Report, the agency revised their policy on transgender searches, and implemented guidelines specifically for searches of transgender and intersex inmates. This information was gone over with staff, and staff signed acknowledgement forms, acknowledging their receipt and understanding of this information. The auditor was provided with the policy update, as well as staff signature sheets. Since this matter was addressed before the completion of the Final Report, the auditor has determined the facility meets this portion of the standard.

During interviews with random staff, the auditor was advised there are plenty of female staff available to assist with pat-down searches of female inmates and such inmates' access to programs or out-of-cell opportunities are never restricted for this reason. Staff were aware of

the agency policy prohibiting staff from searching a transgender or intersex inmate for the sole purpose of determining their genital status. Staff acknowledged an announcement is made prior to a staff member of the opposite gender entering a housing unit. Staff further advised that inmates are given the opportunity to shower, use the restroom, and change clothes, without being viewed by staff of the opposite gender.

During interviews with random inmates, the auditor was advised staff of the opposite gender announce their presence prior to entering the housing unit. Female inmates confirmed female staff are readily available to pat-search them, and their activities are never restricted due to a lack of female staff.

At the time of the audit, there were not any transgender or intersex inmates housed at the facility.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.16	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 141)</p> <p>12. Inmates with Disabilities and Inmates who are Limited in English Proficient</p> <p>Inmates/detainees who are disabled or who are limited English proficient will be provided reasonable accommodations to ensure their understanding of the sexual assault, abuse, and harassment policy of the Worcester County Jail. The use of inmate/detainee interpreters is prohibited unless the circumstances could compromise the inmate/detainee's safety, the performance of first response duties, or the investigation. It is recommended the language translation line be contacted to protect the privacy of the inmate/detainee. Contact numbers for the translation line are posted in Classification, Medical, Booking, and Receiving. Inmates/detainees who are deaf will use the telecommunications device to receive information regarding zero tolerance for sexual assault and sexual abuse. Additional accommodations will be provided by reading the material to inmates/detainees or providing the information in large print for those with limited sight.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>Worcester County Jail has 24 hour access to an interpreter service that is available through the United States Citizen and Immigration Services.</p> <p>The auditor was provided with PREA educational brochures that were written in both English and Spanish.</p> <p>In the past 12 months, the number of instances where inmate interpreters, readers, or other types of inmate assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations: 0</p> <p>Staff and Inmate Interviews</p> <p>During the interview with the Acting Agency Head/PREA Coordinator, the auditor confirmed the agency has established procedures to provide inmates with disabilities and inmates who are limited English proficient 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. The auditor was advised Spanish speaking inmates would receive education in Spanish. Hearing impaired inmates would receive the education through the TTY. Visually impaired inmates would receive the education verbally from staff. If an inmate were both hearing and visually impaired, PREA education material would be transcribed into braille and provided to this inmate.</p>

During an interview with an inmate identified as Spanish speaking, the auditor confirmed this inmate was provided with PREA education written in Spanish. This interview was conducted using the agency's language line. This inmate was aware of the agency's zero tolerance policy towards sexual abuse and sexual harassment, and was also aware of how to report sexual abuse.

During interviews with random staff, the auditor confirmed staff were aware of the agency policy which prohibits the use of inmate interpreters, inmate readers, or other types of inmate assistants, except in limited circumstances. Staff advised they would use another staff member to translate, or use an interpreter from the language line.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.17	<b>Hiring and promotion decisions</b>
	<p data-bbox="252 168 901 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 246 526 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 502 358">Supporting Policies</p> <p data-bbox="252 414 957 448">Worcester County Jail Policies and Procedures states:</p> <p data-bbox="252 492 454 526">(Page 144-145)</p> <p data-bbox="252 582 1476 616">17. Hiring Practices and Promotions for Correctional Staff, Medical Personnel, and Volunteers</p> <p data-bbox="252 660 1460 996">The Worcester County Jail will conduct criminal background checks including federal, state, and local law enforcement agencies on all new hire personnel; as well as medical personnel and volunteer workers. Any applicant for employment as a Correctional Officer, medical personnel, or volunteer worker will disclose prior employment in a correctional institution, if applicable. Prior employers will be contacted to obtain information regarding substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. Criminal background checks will be completed every five years for current correctional employees, medical personnel, and volunteer workers.</p> <p data-bbox="252 1052 1404 1086">The Worcester County Jail is prohibited from hiring or promoting any individual who has:</p> <ul style="list-style-type: none"> <li data-bbox="252 1131 1460 1220">a. Engaged in sexual abuse in a prison, jail or lockup, community confinement facility, and/or juvenile facility.</li> <li data-bbox="252 1265 1484 1388">b. 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.</li> <li data-bbox="252 1433 1468 1512">c. Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.</li> </ul> <p data-bbox="252 1568 1005 1601">Additional Documentation/Observations from Facility Tour</p> <p data-bbox="252 1646 1476 1769">Previous documented and verified sexual harassment complaints filed against any applicant for the position of correctional officer, medical personnel or volunteer worker will be taken into consideration prior to hiring and will be considered prior to promoting current employees.</p> <p data-bbox="252 1825 1476 2027">Auditor reviewed the Worcester County Jail pre-employment application and discovered applicants are required to answer the three questions mentioned above prior to employment. The applicant is required to sign the pre-employment application which states, "I hereby affirm the information provided is accurate and I understand the failure to disclose accurate or missing material will result in my application not being considered."</p> <p data-bbox="252 2083 1460 2150">In the past 12 months, the number of persons hired who may have contact with inmates who have had criminal background record checks: 46 total (10 correctional staff and 36</p>

contractors/volunteers) This is 100% of all staff hired within the past 12 months.

#### Staff and Inmate Interviews

During an interview with Human Resources staff, the auditor confirmed the facility performs criminal record background checks or considers pertinent civil or administrative adjudications for all newly hired employees and all employees who are considered for promotions. This is done for contractors as well. The facility also considers prior 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. Once every five years, Maryland Judiciary and CJIS checks are conducted on all current employees and contractors who may have contact with inmates. The facility asks all applicants and employees who may have contact with inmates about previous misconduct in written applications for hiring or promotions, and in any interviews or written self-evaluations conducted as part of reviews of current employees. When a former employee applies for work at another institution, upon request from that institution, the facility confirmed they provide information on substantiated allegations of sexual abuse or sexual harassment involving the former employee.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.



115.18	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The agency/facility has not acquired a new facility or made a substantial expansion or modification to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.</p> <p>Worcester County Jail is in the process of upgrading from Viacom Camera System to Digital Watchdog Model VAONE168L System. The facility anticipates the new technology will be installed by the end of March 2017.</p> <p>Staff and Inmate Interviews</p> <p>During interviews with Administrative Staff, the auditor confirmed that when designing, acquiring, or planning substantial modifications to facilities, the facility reviews staff numbers to determine whether or not there are enough current officers to properly supervise the inmates. The staffing analysis would be considered before any major changes would be implemented. If a need was discovered during the analysis, the facility would request additional staff. The agency has recently upgraded their camera system. They have not added new cameras; however, the quality of the video is a lot better. The facility went from analog to digital cameras, and added larger monitors in the control rooms. The cameras were positioned in an effort to eliminate blind spots.</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>

115.21	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 148-149)</p> <p>24. Investigation Requirements:</p> <p>A prompt, thorough, objective, and fair investigation shall be conducted by qualified investigators for every incident or allegation of sexual abuse or assault.</p> <p>The Worcester County Jail shall ensure that all allegations of sexual abuse or assault involving potentially criminal behavior are referred for investigation to the Worcester County Bureau of Investigation for criminal procedures.</p> <p>25. Investigation Procedures</p> <p>The Worcester County Jail will conduct an administrative investigation into an incident of sexual abuse/or sexual assault. An administrative investigation will be completed for any report of sexual abuse or assault by certified PREA Investigators. For reports of sexual misconduct the Worcester County Jail PREA Investigators may request additional support from a member of the Worcester Bureau of Investigation. The administrative investigation will be completed and a preponderance of evidence will be completed to determine if the allegations of sexual abuse or harassment are substantiated, unsubstantiated, or unfounded. The preponderance of evidence will include an interview with the victim, accused, witness statements, completed Sexual Misconduct Checklist, and video evidence, if available.</p> <p>Reports of sexual assault may be investigated by a Certified PREA Investigator from the Worcester County Jail. Referral to the Worcester County Bureau of Investigation will be requested by the Warden or Assistant Wardens based on the recommendation of the Certified PREA Investigator from the Worcester County Jail. The investigation will include the use of the form Sexual Assault Checklist.</p> <p>Investigation reports such as the Sexual Misconduct Checklist or Sexual Assault Checklist will be completed by the Certified PREA Investigator, and the victim will be informed in writing of the findings of the investigation. The victim will be required to sign the bottom section of the Sexual Misconduct Checklist or Sexual Assault Checklist to acknowledge the results of the investigation.</p> <p>Correctional Officers shall immediately preserve the crime scene and safeguard information and evidence by securing the location of the sexual assault. The collection of evidence from the crime scene will be completed by a detective from the Worcester County Bureau of Investigation. Example, the area would be secured by correctional staff until authorization is given by the Warden, Assistant Wardens, or Detective from the Worcester County Bureau of</p>

Investigation. Common areas would require the lockdown of the inmate/detainee population for the area where the sexual assault occurred.

Any inmate/detainee transported to Peninsula Regional Medical Center or Atlantic General Hospital for the purpose of forensic examination will be escorted by Correctional Officers of the Worcester County Jail and by a member of the Worcester County Bureau of Investigation. If the victim is a detainee; the Field Supervisor from the Salisbury ICE office will be notified and an ICE Officer from the Salisbury Office will report to the hospital to assist with the security of the detainee. Any inmate/detainee who may be a victim of sexual abuse or sexual assault will be offered a victim advocate from Correct Care Solutions Mental Health staff or from the Life Crisis Center located in Salisbury Maryland. The Warden or his/her designee will contact the Life Crisis Center to obtain assistance for the victim. Medical examinations, forensic examinations and services of the Life Crisis Center are provided free of charge.

The member of the Worcester County Bureau of Investigation will be designated as the lead investigator to complete the sexual assault investigation. Recommendations for criminal charges will be implemented by the member of the Bureau of Investigation.

#### Additional Documentation/Observations from Facility Tour

The auditor was provided with a MOU between Worcester County Jail and Worcester County Bureau of Investigation. The MOU states that Certified PREA Investigators would be used to conduct sexual abuse investigations.

The auditor was provided with a copy of the agency's uniform evidence protocol which is used when collecting evidence. The auditor has determined that there is sufficient technical detail to aid responders in obtaining usable physical evidence.

In the past 12 months, there have not been any forensic examinations conducted.

The auditor was provided with attempts to enter into an agreement with Peninsula Regional Medical Center; however, the final MOU was not signed. The auditor was advised that the MOU is expected to get finalized in the near future. The auditor spoke with their forensic examiners and confirmed these services would be provided even though the MOU is not finalized.

The auditor was provided with an MOU with Worcester Bureau of Investigation and confirmed they are required to follow PREA standards while conducting investigations for Worcester County Jail.

The auditor was provided with an MOU between Worcester County Jail and Life Crisis Center which is valid through September 30, 2017. If requested by the victim, a victim advocate, qualified agency staff member, or qualified community-based organization staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information, and referrals.

#### Staff and Inmate Interviews

During interviews with random staff, the auditor confirmed staff know and understand the agency's protocol for obtaining usable physical evidence if an inmate alleges sexual abuse. Staff were aware which agency staff were responsible for conducting sexual abuse investigations.

During an interview with an inmate who reported sexual abuse, the auditor confirmed the facility gave the inmate access to contact a representative from ICE. The inmate acknowledged this person provided support and stated they would help the inmate file criminal charges. The inmate acknowledged the representative from ICE is still available and would be provided upon request.

During an interview with the Forensic Nurse Coordinator with Peninsula Regional Medical Center, the auditor confirmed the hospital has SAFEs/SANEs available who are on-call 24 hours a day, 7 days a week. The auditor confirmed the facility has made an attempt to enter into an MOU; however, the MOU has not been finalized. The auditor was advised SAFEs/SANEs from the hospital would provide these services to inmates from Worcester County Detention Center even without an MOU.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.22	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states (Pages 148-149):</p> <p>24. Investigation  Requirements: A prompt, thorough, objective, and fair investigation shall be conducted by qualified investigators for every incident or allegation of sexual abuse or assault.</p> <p>The Worcester County Jail shall ensure that all allegations of sexual abuse or assault involving potentially criminal behavior are referred for investigation to the Worcester County Bureau of Investigation for criminal procedures.</p> <p>25. Investigation Procedures  The Worcester County Jail will conduct an administrative investigation into an incident of sexual abuse and/or sexual assault. An administrative investigation will be completed for any report of sexual abuse or assault by certified PREA Investigators. For reports of sexual misconduct, the Worcester County Jail PREA Investigator may request additional support from a member of the Worcester County Bureau of Investigation. The administrative investigation will be completed and a preponderance of evidence will be completed to determine if the allegations of sexual abuse or harassment are substantiated, unsubstantiated, or unfounded. The preponderance of evidence will include an interview with victim, accused, witness statements, completed Sexual Misconduct Checklist, and video evidence, if available.</p> <p>Reports of sexual assault may be investigated by a Certified PREA Investigator from the Worcester County Jail. Referral to the Worcester County Bureau of Investigation will be requested by the Warden or Assistant Wardens based on the recommendation of the Certified PREA Investigator from the Worcester County Jail. The investigation will include the use of the form Sexual Assault Checklist.</p> <p>Investigation reports such as the Sexual Misconduct Checklist or Sexual Assault Checklist will be completed by the Certified PREA Investigator, and the victim will be informed in writing of the findings of the investigation. The victim will be required to sign the bottom section of the Sexual Misconduct Checklist or Sexual Assault Checklist to acknowledge the results of the investigation.</p> <p>Correctional Officer shall immediately preserve the crime scene and safeguard information and evidence by securing the location of the sexual assault. The collection of evidence from the crime scene will be completed by a detective from the Worcester County Bureau of Investigation. Example, the area would be secured by correctional staff until authorization is given by the Warden, Assistant Wardens, or Detective from the Worcester County Bureau of Investigation. Common areas would require the lockdown of the inmate/detainee population for the area where the sexual assault occurred.</p> <p>Any inmate/detainee transported to Peninsula Regional Medical Center or Atlantic General</p>

Hospital for the purpose of forensic examination will be escorted by Correctional Officers of the Worcester County Jail and by a member of the Worcester County Bureau of Investigation. If the victim is a detainee; the Field Supervisor from the Salisbury ICE office will be notified and an ICE Officer from the Salisbury Office will report to the hospital to assist with the security of the detainee. Any inmate/detainee who may be a victim of sexual abuse or sexual assault will be offered a victim advocate from Correct Care Solutions Mental Health staff or from the Life Crisis located in Salisbury Maryland. The Warden or his/her designee will contact the Life Crisis Center to obtain assistance for the victim. Medical examinations, forensic examinations and services of the Life Crisis Center are provided free of charge.

The member of the Worcester County Bureau of Investigation will be designated as the lead investigator to complete the sexual assault investigation. Recommendations for criminal charges will be implemented by the member of the Bureau of Investigation.

#### Additional Documentation/Observations from Facility Tour

In the past 12 months, the number of allegations of sexual abuse and sexual harassment that were received: 8 (Eight resulted in an administrative investigation and 3 resulted in a criminal investigation). Referring to allegations received during the past 12 months, all administrative and/or criminal investigations were completed.

The auditor reviewed the agency's website and confirmed the referral for criminal investigations to Worcester Bureau of Investigation is posted on the website.

The agency documents all referrals of allegations of sexual abuse or sexual harassment for criminal investigation.

#### Staff and Inmate Interviews

During the interview with the Acting Agency Head/PREA Coordinator, the auditor confirmed the agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse or sexual harassment. Administrative investigations are conducted by in-house investigators who have received specialized training. Criminal investigations are conducted by the Sheriff's Office or the Bureau of Investigation. These investigators have also received specialized training.

During an interview with one of the facility investigators, the auditor confirmed allegations that appear to be criminal would be referred to the Worcester Bureau of Investigation and the Worcester County Sheriff's Office.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

<b>115.31</b>	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures meets all staff education requirements found under 115.31.</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Pages 143-144) 15. Staff Training</p> <p>The Assistant Warden of Security will be responsible for all staff training activities regarding sexual assault and abuse. The Assistant Warden of Classification will be responsible for the training of all volunteers and contract workers.</p> <p>Staff Training Requirements:</p> <ul style="list-style-type: none"> <li>a. Training on the Worcester County Jail's Sexual Abuse and Assault Prevention and Intervention Program shall be included in initial and annual refresher training for all employees, volunteers, and contract personnel.</li> <li>b. Training will include zero tolerance for sexual assault or abuse, right of inmates to be free from sexual abuse and sexual harassment.</li> <li>c. The rights of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment.</li> <li>d. How to avoid inappropriate relationships.</li> <li>e. How to communicate effectively and professionally within inmates, including lesbian, gay, bisexual, transgender, intersex, or gender non-conforming inmates.</li> <li>f. Training will include how to respond to signs of threatened and actual abuse.</li> <li>g. How to comply with mandatory reporting of sexual abuse to outside agencies.</li> </ul> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 133)</p> <p>2. All correctional personnel will be provided orientation regarding PREA. Documentation of orientation and subsequent annual training will be monitored by the Training Officer.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>Worcester County Jail houses both male and female inmates. Staff training is tailored for both genders.</p>

During the site visit, the auditor was provided with staff signature sheets documenting staff training.

#### Staff and Inmate Interviews

During interviews with random staff, staff acknowledged receiving training in all aspects of 115.31.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.



115.32	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>N/A</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The auditor was provided with a contractor and volunteer packet used to education contractors and volunteers. The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates. The packet includes information on the agency's zero tolerance policy, as well as information on how contractors and volunteers can report sexual abuse. All contractors and volunteers are provided with this packet and sign an acknowledgement stating they understand the information.</p> <p>The number of volunteers and contractors, who may have contact with inmates, who have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response: 36 (this is 100% of all volunteers and contractors)</p> <p>Staff and Inmate Interviews</p> <p>During interviews with volunteers/contractors, the auditor was advised volunteers and contractors receive training on their responsibilities regarding sexual abuse/harassment prevention, detection, and response, per agency policy and procedure. Prior to having contact with inmates, contractors and volunteers get an overview and briefing about PREA. In addition, they receive PREA training annually. All contractors and volunteers have been notified of the agency's zero-tolerance policy on sexual abuse and sexual harassment, and have been informed about how to report such incidents.</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>

115.33	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Supporting Policies</p> <p>Agency policy requires that inmates who are transferred from one facility to another be educated regarding their rights to be free from both sexual abuse and sexual harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents, to the extent that the policies and procedures of the new facility differ from those of the previous facility.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>Inmates receive information at time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. This information is available to inmates through PREA educational brochures that are provided to inmates at intake. Brochures are available in English and Spanish. Inmates who are deaf would be given the brochures to read. Inmates who are visually impaired would either have the information read to them, or would have the information provided to them in braille, if the inmate can read braille. Inmates with disabilities and inmates who have limited reading skills would have the information read to them. Upon receipt of PREA education, inmates are required to sign an acknowledgement, documenting receipt of this information. PREA educational information is made readily available through PREA posters that are posted throughout the facility, as well as through information provided in the Inmate Handbook.</p> <p>The number of inmates admitted during past 12 months who were given this information at intake: 3,404 (this is out of 3,698 inmates for 92%)</p> <p>All inmates whose length of stay was 30 days or more, received comprehensive PREA education.</p> <p>Staff and Inmate Interviews</p> <p>During an interview with intake staff, the auditor confirmed that all inmates are required to read a PREA poster during intake. Inmates that cannot read, have the information read to them. Once this information is read, inmates receive a copy of the information. This information is available in both English and Spanish. The auditor was advised that PREA education has been provided to all inmates since 2008-2009. PREA information is also readily available through posters that are posted inside all housing units.</p> <p>During interviews with random inmates, the auditor confirmed inmates receive a PREA brochure during intake, and staff go over the brochure with them. The auditor confirmed that during the intake process, inmates are told about:</p> <ol style="list-style-type: none"> <li>a. Their right to not be sexually abused or sexually harassed.</li> <li>b. How to report sexual abuse or sexual harassment.</li> </ol>

c. Their right not to be punished for reporting sexual abuse or sexual harassment.

Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.34	Specialized training: Investigations
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>A prompt, thorough, objective, and fair investigation shall be conducted by qualified investigators trained in conducting sexual abuse investigations in confinement settings for every incident or allegation of sexual abuse or assault.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The auditor was provided with certificates documenting specialized training for investigators responsible for conducting sexual abuse investigations in confinement settings.</p> <p>Staff and Inmate Interviews</p> <p>During an interview with investigative staff, the auditor confirmed investigators receive training specific to conducting sexual abuse investigations in confinement settings. This training was provided by Maryland Department of Public Safety. Training topics included; techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, as well as the criteria and evidence required to substantiate a case for administrative or prosecution referral.</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>

115.35	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>The agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The number of all medical and mental health care practitioners who work regularly at this facility who received the training required by agency policy: 37 (this is 100% of all medical and mental health staff who work at the facility)</p> <p>The auditor was provided with a sample of certificates documenting medical and mental health staff PREA training.</p> <p>Agency medical staff do not conduct forensic medical examinations. Such examinations are conducted at Peninsula Regional Medical Center.</p> <p>Staff and Inmate Interviews</p> <p>During interviews with medical and mental health staff, the auditor confirmed forensic examinations are conducted at Peninsula Regional Medical Center. Medical and mental health staff confirmed they have received specialized training on; how to detect and assess signs of sexual abuse and sexual harassment, how to preserve physical evidence of sexual abuse, how to respond effectively and professionally to victims of sexual abuse and sexual harassment, and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment. Medical and mental health staff receive PREA in-service training annually. All medical and mental health staff watch a PREA video and take a test over the information. This training is also provided to all new medical and mental health staff, prior to employment.</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 182-183)</p> <p>E. Screening for Risk of Sexual Victimization and Abusiveness</p> <ol style="list-style-type: none"> <li>1. All inmates/detainees shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates/detainees or sexually abusive toward other inmates.</li> <li>2. Intake screening shall ordinarily take place within 72 hours of arrival at the facility.</li> <li>3. Screening shall consist of the classification officer completing the PREA Intake Screening Information Form.</li> <li>4. All inmates/detainees who have disclosed any prior sexual victimization during a screening are offered a follow-up meeting with a medical or mental health practitioner within 14 days.</li> <li>5. Inmates/detainees will be housed according to their classification, keeping potential victims housed separate from potential abusers.</li> <li>6. Inmates/detainees shall be reassessed within 30 days from the inmate's/detainee's arrival. Staff will reassess the inmate's/detainee's risk of victimization or abusiveness based upon any additional, relevant information that is documented in Incident Reports, or medical reports, since the intake screening.</li> <li>7. An inmate's/detainee'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/detainee's risk of sexual victimization or abusiveness.</li> <li>8. Inmates/detainees may not be disciplined for refusing to answer, or for not disclosing complete information in response to the screening.</li> <li>9. Screening information will not be utilized by classification and will not be openly shared with other staff members or inmates/detainees. Screening information will be stored in the Classification Office.</li> </ol> <p>Additional Documentation/Observations from Facility Tour</p> <p>The auditor reviewed the risk screening instrument and determined it to objective.</p> <p>During the onsite audit, the auditor confirmed all inmates receive an initial screening within 72 hours of intake. Intake staff conduct the screening and counselors review the screenings within 72 hours. Counselors verbally speak with all inmates within 30 days of intake to reassess them; however, a formal reassessment using the screening tool is only conducted if counselors discover information that may warrant a reassessment. The auditor confirmed 100% of all inmates are reviewed within 30 days.</p> <p>During the onsite audit, the auditor randomly selected five inmates and requested their screening documentation. A review of this information confirms inmates are being screened</p>

within 72 hours of intake, and again within 30 days of intake.

#### Staff and Inmate Interviews

During an interview with staff responsible for risk screening, the auditor confirmed all inmates are screened upon admission to the facility or transfer from another facility for risk of sexual abuse victimization or sexual abusiveness toward other inmates. This is done within 72 hours of intake. The screening instrument consists of mostly yes/no questions that ask all required questions under 115.41. All inmates are reassessed by counselors within 30 days of intake. Inmates are also reassessed as needed 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. The auditor was advised inmates are never disciplined for refusing to answer any questions related to the risk screening. The auditor was advised only staff with a "need-to-know" have access to risk screening information. Some of these staff include, the Warden, Assistant Wardens, Captain, Lieutenants, classification, and intake staff.

During interviews with random inmates, the auditor confirmed inmates are screened during intake, and are screened again within a few weeks of intake.

During an interview with the Acting Warden/PREA Coordinator, the auditor confirmed the agency has outlined who should have access to an inmate's risk assessment within the facility. The auditor was advised the Warden/PREA Coordinator, Assistant Warden, counselors, classification, and intake staff all have access to this information.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.42	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 177)</p> <p>c) Information obtained during the classification and risk screening will be used to perform housing, cell assignments, work, education, and program assignments with the goal of keeping separate those inmates/detainees at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p>(Pages 183-184)</p> <p>B. Use of Screening Instrument</p> <p>Staff shall use information from the risk screening to assign housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p>a. Once an inmate's/detainee's risk assessment is completed, the classification officer will indicate on the classification form that the risk assessment has been completed.</p> <p>b. If an inmate/detainee is determined to be a potential victim, the classification officer will document this on his/her classification form and will be assigned to the least restrictive housing unit.</p> <p>c. if an inmate/detainee is determined to be a potential predator, the classification officer will document this on his/her classification form and will be assigned to the least restrictive housing.</p> <p>Staff shall make individualized determinations about how to ensure the safety of each inmate.</p> <ol style="list-style-type: none"> <li>1. In deciding whether to assign a transgender or intersex inmate/detainee to a facility for male or female inmates/detainees, 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/detainee's health and safety, and whether the placement would present management or security problems.</li> <li>2. Placement and programming assignments for each transgender or intersex inmate/detainee shall be reassessed at least twice each year to review any threats to safety experienced by the inmate.</li> <li>3. A transgender or intersex inmate's/detainee's own views with respect to his or her own safety shall be given serious consideration.</li> <li>4. Transgender and intersex inmates/detainees shall be given the opportunity to shower separately from other inmates/detainees.</li> <li>5. staff are prohibited from placing lesbian, gay, bisexual, transgender, or intersex inmates/detainees 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 judgement for the</li> </ol>

purpose of protecting such inmates/detainees.

#### Additional Documentation/Observations from Facility Tour

During the site visit, the auditor confirmed inmates identified as potential victims were housed separately from those inmates housed as potential abusers.

#### Staff and Inmate Interviews

During an interview with the Acting Warden/PREA Coordinator, the auditor confirmed the agency is not subject to a consent decree, legal settlement, or legal judgment requiring the agency place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of their sexual orientation, genital status, or gender identity.

During an interview with staff responsible for risk screening, the auditor confirmed the facility uses the screening information to identify potential victims and potential abusers. The auditor was advised potential victims and potential predators would never be housed together. 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. Transgender or intersex inmate's own views of his or her own safety given serious consideration in placement and programming assignments. Transgender and intersex inmates given the opportunity to shower separately from other inmates.

During interviews with homosexual/lesbian inmates, the auditor confirmed such inmates are housed in general population and have access to all regular privileges.

At the time of the audit, there were no inmates identified as transgender/intersex that were housed at the facility.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.



115.43	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 184-185)</p> <p>C. Protective Custody</p> <p>1. Inmates/detainees at high risk for sexual victimization including those who allege to have been a victim of sexual abuse, 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 staff cannot conduct such an assessment immediately, the inmate may be housed in an involuntary segregated housing for less than 24 hours while completing the assessment.</p> <p>a) Inmates/detainees placed in segregated housing for this purpose shall have access to programs, privileges, education, or work opportunities, to the extent possible.</p> <p>b) If staff restricts access to programs, privileges, education, or work opportunities, the staff shall document:</p> <ol style="list-style-type: none"> <li>1. The opportunities that have been limited; and</li> <li>2. The duration of the limitations; and</li> <li>3. The reasons for such limitations.</li> </ol> <p>c) Staff shall assign such inmates/detainees to involuntary segregated housing only until alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinary exceed a period of 30 days.</p> <p>d) If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, the facility shall clearly document:</p> <ol style="list-style-type: none"> <li>1. The basis for the facility's concern for the inmate's/detainee's safety; and</li> <li>2. The reason why no alternative means of separation can be arranged.</li> </ol> <p>Every 30 days, the staff shall afford each such inmate/detainee a review to determine whether there is a continuing need for separation from the general population.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The number of inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment: 0</p> <p>Staff and Inmate Interviews</p> <p>During an interview with the Acting Warden/PREA Coordinator, the auditor confirmed agency policy prohibits placing inmates at high risk for sexual victimization or who have alleged sexual abuse in involuntary segregated housing in lieu of other housing areas, unless an assessment has determined there are no available alternative means of separation from potential abusers. Typically, these inmates would be placed in a smaller general population housing unit, but would retain all regular privileges. If an inmate at high risk for sexual victimization or who has</p>

alleged sexual abuse was placed in involuntary segregated housing, they would only be housed in segregated housing until an alternative means of separation from likely abusers could be arranged. This normally would not exceed 72 hours.

During an interview with staff who supervise inmates in segregated housing, the auditor confirmed inmates are rarely placed in involuntary segregated housing due to being at risk of being sexually abused. The auditor was advised that if an inmate were placed in involuntary segregated housing for this reason, they would still have access to programs, privileges, education, and work opportunities. If the facility were to restrict these activities, the facility would document the opportunities that were limited, the duration of the limitations, and the reasons for such limitations. Inmates would be placed in involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged. All inmates assigned to segregated housing are reviewed every 30 days.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.51	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>Worcester County Jail inmates/detainees may make reports of sexual abuse or assault verbally, written, anonymously, or from an outside individual. Inmates/detainees may dial a toll free number to report sexual abuse or assault. Toll free numbers are posted in all housing units and provided in the inmate/detainee hand book received upon arrival. All inmates/detainees will initial the Worcester County Jail Form #125 and the Classification Form to acknowledge the receipt of the information contained in the inmate/detainee handbook.</p> <p>Staff may make private reports by sending an anonymous letter to the Warden or Assistant Wardens.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The Inmate PREA education brochure outlines several ways inmates can report sexual abuse. The brochure states inmates can:</p> <ol style="list-style-type: none"> <li>1. Tell any staff member, medical personnel, or volunteer.</li> <li>2. File an informal or formal grievance (including emergency grievance) with the facility.</li> <li>3. Inmates may report by writing a letter to the Life Crisis Center- P.O. Box 387- Salisbury, Maryland- 21803.</li> <li>4. ICE detainees may report the abuse to ICE/ERO staff members who visit the facility or by writing a letter to the ICE Office of Professional Responsibility or the Joint Intake Center (1-877-246-8253) at P.O. Box 14475- 1200 Pennsylvania Ave. NW- Washington D.C.- 20044.</li> </ol> <p>The Inmate PREA posters also contain the mailing address and phone number to Life Crisis Center.</p> <p>Staff are required to document verbal reports.</p> <p>The auditor tested the PREA hotline during the site visit and confirmed it was operable.</p> <p>Staff and Inmate Interviews</p> <p>During interviews with random staff, the auditor confirmed staff can privately report to any supervisor. Inmates can privately report to any officer, write a request slip, or call the hotline. Staff acknowledged inmates can report verbally, in writing, anonymously, and from third parties. Staff would document verbal reports immediately.</p> <p>During interviews with random inmates, the auditor confirmed inmates were aware they could report verbally to any officer, through a written request, or through the hotline. Inmates were aware they could make anonymous reports without giving their name. Inmates were aware</p>

they could make reports of sexual abuse or sexual harassment in person or in writing, or through a third party such as a friend or relative.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.52	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 138)</p> <p>d. ICE detainees may report sexual abuse or assault to DHS/ICE in writing by informal or formal requests or grievances, including emergency grievances, telephone calls, or written reports to DHS/OIG or ICE/OPR.</p> <p>(Page 168)</p> <p>B. Emergency grievances involve an immediate threat to an inmate's/detainee's health, safety, and welfare. Emergency grievances will require immediate action by the Shift Supervisor and/or member of Command Staff. Emergency Grievances will require the Shift Supervisor to prepare a WCJ Form #113 detailing the actions taken.</p> <p>b. Written informal requests, WCJ Form #500 Request Form, or formal requests through the WCJ Grievance Form provided by the Shift Supervisor. Grievances alleging sexual abuse will not be submitted to any staff member who is the subject of the complaint. Grievances or any portion of the grievance filed against a staff member will not be referred to the staff member who is the subject of the complaint. Decisions on the merits of any grievances or any portion of the grievance alleging sexual abuse will be made within 90 days of the filing of the grievance.</p> <p>e. Worcester County Jail inmates/detainees may make reports of sexual abuse or assault verbally, written, anonymously, or from an outside individual. Inmates/detainees may dial a toll free number to report sexual abuse or assault. Toll free numbers are posted in all housing units and provided in the inmate/detainee hand book received upon arrival. All inmates/detainees will initial the Worcester County Jail Form #125 and the Classification Form to acknowledge the receipt of the information contained in the inmate/detainee handbook.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>In the past 12 months, the number of grievances filed that alleged sexual abuse: 0</p> <p>The number of emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months: 0</p> <p>In the past 12 months, the number of inmate grievances alleging sexual abuse that resulted in disciplinary action by the agency against the inmate for having filed the grievance in bad faith: 0</p> <p>Staff and Inmate Interviews</p>

During an interview with an inmate who reported sexual abuse, the auditor confirmed she was told in writing of decisions made about her report. She was given a decision the same day she reported the information. She was aware the facility is required to give decisions within 90 days of inmates making the report of sexual abuse.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.53	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>N/A</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The agency has an MOU with Life Crisis which expires on September 30, 2017. The MOU states Life Crisis will provide a 24 hour hotline for confidential crisis intervention. The auditor confirmed the mailing address and phone number to Life Crisis is readily available in the Inmate PREA brochure, as well as in the PREA posters that are posted throughout the facility. In addition, the ICE detainees have the mailing address and phone number to contact ICE.</p> <p>The Inmate PREA brochure has information on the limits of confidentiality. The brochure states: Information concerning the identity of a victim reporting a sexual assault, and the facts of the report itself, will be limited to those who have a need to know in order to make decisions concerning the victim's welfare and for law enforcement/investigative purposes.</p> <p>Staff and Inmate Interviews</p> <p>During interviews with random inmates, the auditor confirmed inmates were knowledgeable of the victim advocate services that were available to inmates who have been sexually abused. Many inmates acknowledged having posters in their housing units, as well as in the inmate handbook, that contain mailing addresses and phone numbers to outside victim advocates. Inmates stated the numbers are free to call, and that they could contact outside victim advocates through the hotline anytime. Inmates stated the calls would remain private; however, if an inmate told a victim advocate that someone's life was in danger, they would be required to report this information to facility staff.</p> <p>During an interview with an inmate who reported sexual abuse, the auditor confirmed this inmate received mailing addresses and telephone numbers to outside victim advocates. This inmate specifically stated she was provided with contact information to ICE and Life Crisis Center. These numbers are free to call. This inmate acknowledged she could write or call these individuals anytime she wanted to, and that she is able to talk to them in a confidential manner.</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>

<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>N/A</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The agency has an MOU with Life Crisis Center. The MOU states Life Crisis will provide a 24 hour hotline. This hotline can be used for inmates to make third-party reports. The MOU states Life Crisis Center will notify the facility within 2 hours of receiving the report.</p> <p>Inmate PREA brochures state inmates may file a report on behalf of another inmate/detainee by contacting Life Crisis Center.</p> <p>Staff and Inmate Interviews</p> <p>N/A</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>



115.61	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 145)  All staff, including Correctional Officers, volunteers, and contract workers, must immediately report any known or suspected incidents, allegations, or suspicions, or information they receive regarding an incident of sexual abuse, harassment, or assault to the Shift Supervisor, Operations Officers, and/or any member of the Command Staff. Staff members including Correctional Officers, volunteers, and contract workers may privately report sexual abuse or sexual harassment of inmates/detainees to the Warden, Assistant Warden of Security, and/or the Assistant Warden of Classification, in person, or by telephone. All staff, including Correctional Officers, volunteers, and contract workers will report immediately any retaliation against inmates/detainees or other staff members who report sexual abuse/harassment or sexual assault. In addition, staff will report immediately any neglect or violation of responsibilities by any staff member that may have contributed to an incident or retaliation.</p> <p>(Page 146)  Information regarding the identity of the victim reporting a sexual assault, and the facts of the reports itself, shall be limited to those who need to know in order to make decisions concerning the victim's welfare and for law enforcement/investigative purposes.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>N/A</p> <p>Staff and Inmate Interviews</p> <p>During interviews with random staff, the auditor confirmed staff were aware that the agency requires all staff to report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</p> <p>During interviews with medical and mental health staff, the auditor confirmed medical and mental health staff discloses limitations of confidentiality and their duty to report at the initiation of services to an inmate. Medical and mental health staff also acknowledged they are required to report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment to a designated supervisor or official immediately upon learning of it.</p> <p>During an interview with the Acting Warden/PREA Coordinator, the auditor confirmed all allegations of sexual abuse and sexual harassment (including those from third-party and anonymous sources) reported directly to designated facility investigators. When an allegation</p>

of sexual abuse or sexual harassment is made by someone under the age of 18 or someone considered a vulnerable adult under state or local law, the facility would report this information to juvenile services.

Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.62	Agency protection duties
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 139)</p> <p>e. When the facility learns that an inmate/detainee is subject to a substantial risk of imminent sexual abuse, immediate action shall be taken to protect the inmate (i.e., some action taken to assess and implement appropriate protective measures without unnecessary delay).</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>In the past 12 months, the number of times the agency or facility determined that an inmate was subject to a substantial risk of imminent sexual abuse: 0</p> <p>Staff and Inmate Interviews</p> <p>During an interview with the Acting Agency Head/Acting Warden/PREA Coordinator, the auditor confirmed when the facility learns that an inmate is subject to a substantial risk of imminent sexual abuse, the inmate is be placed in the least restrictive housing, in a cell by themselves. The inmate would receive all regular programs and privileges. The facility would ensure this inmate is never transported with any potential predators.</p> <p>During interviews with random staff, staff acknowledged if they discovered an inmate was at risk of imminent sexual abuse, they would immediately remove the inmate from the housing unit and contact a supervisor.</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>



115.63	<b>Reporting to other confinement facilities</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 504 360">Supporting Policies</p> <p data-bbox="252 412 957 445">Worcester County Jail Policies and Procedures states:</p> <p data-bbox="252 497 399 530">(Page 146)</p> <p data-bbox="252 539 1481 786">Upon receiving an allegation that an inmate/detainee was sexually abused while confined at another facility, the Warden or his/her designee will notify the appropriate administrator where the alleged abuse occurred as soon as possible, and no later than 72 hours after receiving the allegation. Allegations received from other facilities and/or agencies will be investigated in accordance with the Prison Rape Elimination Act Standards. The victim will be notified of the investigation and the findings of the investigation.</p> <p data-bbox="252 837 1003 871">Additional Documentation/Observations from Facility Tour</p> <p data-bbox="252 922 1399 1001">The agency or facility documents that it has provided such notification within 72 hours of receiving the allegation.</p> <p data-bbox="252 1052 1399 1131">In the past 12 months, the number of allegations the facility received that an inmate was abused while confined at another facility: 0</p> <p data-bbox="252 1182 1425 1261">In the past 12 months, the number of allegations of sexual abuse the facility received from other facilities: 0</p> <p data-bbox="252 1312 609 1346">Staff and Inmate Interviews</p> <p data-bbox="252 1397 1481 1816">During an interview with the Acting Agency Head/Acting Warden/PREA Coordinator, the auditor confirmed if another agency or a facility within another agency refers allegations of sexual abuse or sexual harassment that occurred within one of their facilities, the PREA Coordinator would make a referral to Worcester Bureau of Investigation and Worcester County Sheriff's Office for investigation. There have been no such allegations within the past 12 months. If Worcester County Jail received such allegations, the Acting Warden/PREA Coordinator would immediately contact the agency in which the alleged abuse had occurred, advise them of the allegation, and give them the opportunity to send an investigator to interview the inmate. The auditor was advised there have not been any such allegations within the past 12 months.</p> <p data-bbox="252 1868 507 1901">Final Determination</p> <p data-bbox="252 1953 1447 2076">Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>



115.64	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Pages 146-147)</p> <p>20. First Responder Procedures</p> <p>The Worcester County Jail will adhere to the following evidence protocol regarding sexual assault:</p> <ol style="list-style-type: none"> <li>a. Separate the victim from the abuser.</li> <li>b. Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.</li> <li>c. If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.</li> <li>d. If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.</li> </ol> <p>Medical and Mental Health Training (Page11)</p> <p>Should the sexual abuse occur within a time frame that allows for the collection of physical evidence, the health care worker should request that the victim not take any actions which would destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothing, urinating, defecating, smoking, drinking or eating, as well as notifying security staff immediately. The crime scene and any evidence such as clothing must be preserved.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>In the past 12 months, the number of allegations that an inmate was sexually abused: 3</p> <p>Of these allegations of sexual abuse in the past 12 months, the number of times the first security staff member to respond to the report separated the alleged victim and abuser: 3</p> <p>In the past 12 months, the number of allegations where staff were notified within a time period that still allowed for the collection of physical evidence: 3</p> <p>Of these allegations in the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report preserved and protected any crime scene until appropriate</p>

steps could be taken to collect any evidence: 3

Of these allegations in the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report requested 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: 3

Of these allegations in the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report ensured that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating: 3

Of the allegations that an inmate was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder: 0

#### Staff and Inmate Interviews

During an interview with an inmate who reported sexual abuse, the auditor confirmed staff responded immediately and took her to see medical. The inmate acknowledged staff responded quickly, and immediately started an investigation.

During an interview with random staff, staff acknowledged they were aware of their first responder duties which include; separating the victim from the abuser, removing the inmates from the housing unit, collecting evidence, ensuring both the victim and abuser do not do anything that could destroy evidence (eat, drink, wash, brush teeth, change clothes), notify a supervisor, escort the inmates to medical (separately), and document the incident in a written report.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

<b>115.65</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>Page 145-149 of the agency policy outline the agency's coordinated response plan for first responders, medical and mental health staff, and investigators.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>N/A</p> <p>Staff and Inmate Interviews</p> <p>During an interview with the Acting Warden/PREA Coordinator, the auditor confirmed the facility has a plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership in response to an incident of sexual abuse. This plan is outlined in the agency policy.</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>



115.66	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>N/A</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The auditor was advised the agency, facility, or any other governmental entity responsible for collective bargaining on the agency's behalf has not entered into or renewed any collective bargaining agreement or other agreement since the last PREA audit.</p> <p>Staff and Inmate Interviews</p> <p>During an interview with the Acting Agency Head/Acting Warden/PREA Coordinator, the auditor confirmed the has not entered into or renewed any collective bargaining agreements or other agreements since the last PREA audit.</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>

115.67	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 134)</p> <p>4. All staff and/or inmates/detainees who report or cooperate in the investigation of sexual abuse or harassment or suspected sexual abuse or harassment shall be free from retaliation.</p> <p>6. The Worcester County Jail will monitor the conduct or treatment of those who report sexual abuse for a period of 90 days. The Warden or Assistant Warden of Security or the Assistant Warden of Classification will complete the monitoring of those who report sexual abuse.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The agency/facility acts promptly to remedy any such retaliation. The agency/facility continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.</p> <p>The number of times an incident of retaliation occurred in the past 12 months: 0</p> <p>Staff and Inmate Interviews</p> <p>During the interview with the Agency Head/Acting Warden/PREA Coordinator, the auditor confirmed if retaliation is suspected and staff is involved, this staff member would be removed from the facility pending investigation. If another inmate was involved, the inmate would face disciplinary action. In all instances, there would be no contact allowed between the reporter and any retaliator. Measures taken to protect inmates and staff from retaliation include; having no contact between the reporter and the retaliator, and if staff were involved, removal of staff from the facility pending investigation.</p> <p>During an interview with the retaliation monitor, the auditor was advised that the first step to protecting inmates from retaliation is to keep all reports confidential. The auditor was advised that all staff and inmates have been made aware that retaliation is prohibited. Anyone who reports sexual abuse is monitored closely. The retaliation monitor acknowledged making initial contact with the reporter. Classification would check on the inmate daily for the first week. After the first week, classification would speak with the inmate on a weekly basis. The retaliation monitor would follow up with classification and ensure the reporter is not being retaliated against. The retaliation monitor would ensure the reporter feels safe and comfortable. The retaliation monitor also monitors disciplinary reports, housing changes, and narratives in the computer. The auditor was advised that retaliation monitoring would last for the duration of the inmate's stay at the facility, or as long as the staff member is employed, if necessary.</p> <p>During an interview with the Acting Warden, the auditor confirmed the review team considers</p>

whether the allegation was motivated by race, ethnicity, gender identity, or perceived status, gang affiliation, and/or other group dynamics; examines the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assesses the adequacy of staffing levels in that area during different shifts, and assesses whether monitoring technology should be deployed or augmented to supplement supervision by staff.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.68	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 147)</p> <p>b. Care must be taken not to punish a confirmed or alleged sexual assault victim either for reporting sexual abuse or for participating in sexual activity as a result of force, coercion, threats, or fear of force.</p> <p>c. The victim shall be housed in a supportive environment that represents the least restrictive housing option possible, and that will, to the extent possible, permit the victim the same level privileges he/she was permitted immediately prior to the sexual assault.</p> <p>d. Victims may not be held longer than five days in any type of administrative segregation or protective purposes, except in highly unusual circumstance or at the request of the victim.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>If an involuntary segregated housing assignment is made, the facility affords each such inmate a review every 30 days to determine whether there is a continuing need for separation from the general population.</p> <p>The number of inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment: 0</p> <p>Staff and Inmate Interviews</p> <p>During an interview with the Acting Warden/PREA Coordinator, the auditor confirmed agency policy prohibits placing inmates at high risk for sexual victimization or who have alleged sexual abuse in involuntary segregated housing in lieu of other housing areas, unless an assessment has determined there are no available alternative means of separation from potential abusers. If an inmate were placed in involuntary segregated housing for this reason, they would only be housed here until alternative means of separation from likely abusers could be arranged. Typically, inmates would not be held in involuntary segregated housing longer than 72 hours. In the past 12 months, the facility has not had to use involuntary segregated housing for this reason.</p> <p>During an interview with staff who supervise inmates in segregated housing, the auditor confirmed that if an inmate were placed in involuntary segregated housing for protection from sexual abuse, they would still have access to programs, privileges, education, and work opportunities. If the facility restricts these activities, they would document the opportunities that were limited, the duration of the limitations, and the reasons for such limitations. Inmates would only be housed in involuntary segregated housing until alternative means of separation from likely abusers could be arranged. The auditor confirmed all inmates held in segregated</p>

housing are reviewed every 30 days.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.71	<b>Criminal and administrative agency investigations</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 148)</p> <p>24. Investigation</p> <p>Requirements:</p> <p>A prompt, thorough, objective, and fair investigation shall be conducted by qualified investigators for every incident or allegation of sexual abuse or assault.</p> <p>The Worcester County Jail shall ensure that all allegations of sexual abuse or assault involving potentially criminal behavior are referred for investigation to the Worcester County Bureau of Investigation for criminal procedures.</p> <p>25. Investigation Procedures</p> <p>The Worcester County Jail will conduct an administrative investigation into an incident of sexual abuse and/or sexual assault. An administrative investigation will be completed for any report of sexual abuse or assault by certified PREA Investigators. For reports of sexual misconduct, the Worcester County Jail PREA Investigator may request additional support from a member of the Worcester County Bureau of Investigation. The administrative investigation will be completed and a preponderance of evidence will be completed to determine if the allegations of sexual abuse or assault are substantiated, unsubstantiated, or unfounded.</p> <p>The Worcester County Jail will ensure that incident based and aggregate data is securely retained. The Worcester County Jail will prepare an annual report of aggregated sexual abuse data and the report is will be available for review by the public upon the receipt of an open records request. A poster will be placed in the visitation lobbies containing information regarding Prison Rape Elimination Act to include; how to report sexual abuse, the investigation of sexual abuse and the procedure for requesting a copy of the annual report by obtaining an open records request from the Worcester County Commissioners Office. The Worcester County Jail shall maintain sexual abuse data collected pursuant to PREA Standard 115.87 for at least 10 years after the date of initial collection.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The number of substantiated allegations of conduct that appear to be criminal that were referred for prosecution since August 20, 2012, or since the last PREA audit, whichever is later: 2</p> <p>Staff and Inmate Interviews</p>

During an interview with investigative staff, the auditor confirmed investigators receive specialized training in conducting sexual abuse investigations in confinement settings. The auditor was advised this training was provided by Maryland Department of Public Safety. Training topics included; techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative or prosecution referral. Investigations would be started immediately. If an incident occurred on the weekend, an investigator would be called in to initiate the investigation. The first steps of the investigation would include meeting and interviewing the victim. The investigator would ensure evidence is not destroyed. The investigator would also meet and interview the suspect. The information gathered from the interviews would be documented in a written report. Anonymous and third-party reports would be investigated the same as all other reports. Evidence would include; blood (DNA), articles left in the cell, video footage, as well as statements from the victim, suspect, and witnesses. All criminal investigations would be conducted by the Worcester County Sheriff's Office or Worcester Bureau of Investigation. The credibility of an alleged victim, suspect, and witnesses are not judged any differently. The auditor was advised under no circumstances does the agency require an inmate who alleges sexual abuse to submit to a polygraph examination or truth-telling device as a condition for proceeding with an investigation. Allegations would be referred for prosecution once it is determined the case is substantiated and criminal in nature. If a staff member terminates employment prior to the conclusion of an investigation, the investigation would continue. If an inmate is released prior to the completion of an investigation, the investigation would continue. If an outside agency were conducting an investigation, the facility investigators would assist in any way possible (provide any needed information, gather video or reports, etc.). Facility investigators review the allegation and ensures staff actions or failures to act did not contribute to the sexual abuse. Administrative and criminal investigation reports include the complete investigation, including; a checklist, and overview of the incident, and the findings.

During an interview with an inmate who reported sexual abuse, the auditor confirmed the inmate was not required to take a polygraph examination as a condition of proceeding with the investigation.

During an interview with the Acting Warden/PREA Coordinator, the auditor confirmed the PREA Coordinator would be the point of contact if an outside agency were conducting an investigation into an allegation of sexual abuse.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.72	<p><b>Evidentiary standard for administrative investigations</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Pages 148-149)</p> <p>The administrative investigation will be completed and a preponderance of evidence will be completed to determine if the allegations of sexual abuse or sexual harassment are substantiated, unsubstantiated, or unfounded. The preponderance of evidence will include an interview with the victim, accused, witness statements, completed Sexual Misconduct Checklist, and video evidence, if available.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>A review of investigations indicate a preponderance of evidence is used when determining whether or not an allegation will be substantiated.</p> <p>Staff and Inmate Interviews</p> <p>During an interview with investigative staff, the auditor confirmed investigators use a preponderance of evidence standard when determining whether or not to substantiate an allegation of sexual abuse.</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>
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115.73	<b>Reporting to inmates</b>
	<p data-bbox="252 168 896 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="252 246 523 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 502 358">Supporting Policies</p> <p data-bbox="252 414 957 448">Worcester County Jail Policies and Procedures states:</p> <p data-bbox="252 504 399 537">(Page 146)</p> <p data-bbox="252 537 1436 571">The victim will be notified of the results of the investigation and findings of the investigation.</p> <p data-bbox="252 627 399 660">(Page 142)</p> <p data-bbox="252 672 694 705">14. Reports to Inmates/Detainees</p> <ol data-bbox="252 750 1484 2027" style="list-style-type: none"> <li>1. Following an investigation into an inmate's/detainee's allegation that he or she suffered sexual abuse while incarcerated, the inmate/detainee shall be informed, verbally, or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. The inmate/detainee will sign the completed Sexual Misconduct form or the Sexual Abuse form.</li> <li>2. Following an inmate's/detainee's allegation that a staff member has committed sexual abuse against the inmate, the inmate/detainee shall be informed (unless it was determined the allegation was unfounded or unsubstantiated) whenever: <ol data-bbox="252 1142 1484 1388" style="list-style-type: none"> <li>a. The staff member is no longer posted within the inmate's housing unit.</li> <li>b. The staff member is no longer employed at the facility.</li> <li>c. Upon receiving information that the staff member has been indicted on a charge related to sexual abuse within the facility.</li> <li>d. Upon receiving information that the staff member has been convicted on a charge related to sexual abuse within the facility.</li> </ol> </li> <li>3. Following an inmate's/detainee's allegation that he or she has been sexually abused by another inmate/detainee, the agency shall subsequently inform the alleged victim whenever: <ol data-bbox="252 1568 1484 1736" style="list-style-type: none"> <li>a. Upon receiving information that the alleged abuser has been indicted on a charge related to sexual abuse within the facility.</li> <li>b. Upon receiving information that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.</li> </ol> </li> <li>4. All such notifications or attempted notifications shall be documented on the Worcester County Jail Form # 601 Progress sheet.</li> <li>5. The obligation to report this information to the victim shall terminate if the victim is released from custody. Prior to release, victims shall be provided with the contact information for the Investigator assigned to investigate their case.</li> </ol> <p data-bbox="252 2083 1005 2116">Additional Documentation/Observations from Facility Tour</p>

The number of criminal and/or administrative investigations of alleged inmate sexual abuse that were completed by the agency/facility in the past 12 months: 8

Of the alleged sexual abuse investigations that were completed in the past 12 months, the number of inmates who were notified, verbally or in writing, of the results of the investigation: 8

If an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity in order to inform the inmate of the outcome of the investigation.

The number of investigations of alleged inmate sexual abuse in the facility that were completed by an outside agency in the past 12 months: 3

Of those notifications made in the past 12 months, the number that were documented: 3

There have not been any substantiated or unsubstantiated complaints (i.e., not unfounded) of sexual abuse committed by a staff member against an inmate in an agency facility in the past 12 months.

In the past 12 months, the number of notifications to inmates that were provided pursuant to this standard: 3

Of those notifications made in the past 12 months, the number that were documented: 3

During the site visit, the auditor was provided with a sample of Inmate Notifications.

#### Staff and Inmate Interviews

During an interview with the Acting Warden/PREA Coordinator and facility investigator, the auditor confirmed the facility notifies any inmate who makes an allegation of sexual abuse when the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation. The inmate would be required to sign documenting receipt of the notification and a copy of this would be kept with the inmate's file.

During an interview with an inmate who reported sexual abuse, the auditor confirmed this inmate was notified at the conclusion of the investigation and was told whether the allegation was substantiated, unsubstantiated, or unfounded. There were no charges filed for this incident.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.76	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 150) 26. Disciplinary Sanctions</p> <p>a. All perpetrators of sexual abuse or assault shall be disciplined and referred for criminal prosecution as appropriate.</p> <p>b. Inmates/detainees found to be in violation of the sexual abuse policy of the Worcester County Jail will be offered counseling from the Mental Health provider as an intervention as a condition of access to participation in facility offered programs.</p> <p>c. Any Sexual conduct between inmates/detainees is prohibited and will not be tolerated.</p> <p>d. Any Sexual conduct between inmates/detainees and correctional staff, contract workers, or volunteers is prohibited and will not be tolerated.</p> <p>e. Any staff member, volunteer, or contract worker determined to have perpetrated sexual abuse or assault or to have failed to comply with the requirements established by this policy shall be subject to disciplinary sanctions up to and including termination from duty and prosecution.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>In the past 12 months, the number of staff from the facility who have violated agency sexual abuse or sexual harassment policies: 0</p> <p>The disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are 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.</p> <p>In the past 12 months, the number of staff from the facility who have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies (other than actually engaging in sexual abuse): 0</p> <p>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, are reported to law enforcement agencies (unless the activity was clearly not criminal) and to any relevant licensing bodies.</p> <p>In the past 12 months, the number of staff from the facility that have been reported to law enforcement or licensing boards following their termination (or resignation prior to termination) for violating agency sexual abuse or sexual harassment policies: 0</p>

Staff and Inmate Interviews

N/A

Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.77	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 144)</p> <p>16. Corrective Action for Staff, Contractors, and Volunteers</p> <p>If a Worcester County Jail staff member, contractor, or volunteer is alleged to be the perpetrator of inmate/detainee sexual abuse and/or assault, the incident will be referred to the Worcester County Sheriff's Office by the Warden or his/her designee. The staff member, contractor, volunteer will be prohibited from having contact with inmates/detainees and removed from duty pending the conclusion of the investigation.</p> <p>If the allegation is made regarding a contractor or a volunteer, the Administrator of the appropriate agency will be notified of the allegation and the Investigation; and the Administrator will be advised that the individual will be prohibited from returning to the facility pending the completion of the investigation.</p> <p>Any staff member, contractor, or volunteer who engages in sexual abuse of inmates/detainees will be reported to Worcester County Sheriff's Office and to relevant licensing bodies. If the allegation is made against a staff member of immigration and Custody Enforcement the Salisbury Field Office Supervisor will be notified immediately by the Warden or his/her designee.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>In the past 12 months, the number of contractors or volunteers reported to law enforcement for engaging in sexual abuse of inmates: 0</p> <p>Staff and Inmate Interviews</p> <p>During an interview with the Acting Warden/PREA Coordinator, the auditor was advised if a contractor or volunteer violated agency sexual abuse and/or sexual harassment policies, they would be removed from the facility pending investigation. The auditor was advised this would occur for even minor violations. The auditor was advised there have not been any examples of volunteers or contractors violating agency sexual abuse and/or sexual harassment policies in the past 12 months.</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>



115.78	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>26. Disciplinary Sanctions</p> <p>(Page 153)</p> <p>g. The facility shall not discipline an inmate/detainee for sexual contact with staff unless there is a finding that the staff member did not consent to such contact.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>Inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse.</p> <p>Inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse.</p> <p>In the past 12 months, the number of administrative findings of inmate-on-inmate sexual abuse that have occurred at the facility: 1</p> <p>In the past 12 months, the number of criminal findings of guilt for inmate-on-inmate sexual abuse that have occurred at the facility: 1</p> <p>The facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse and considers 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 prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation.</p> <p>Staff and Inmate Interviews</p> <p>During an interview with the Acting Warden/PREA Coordinator, the auditor was advised administrative sanctions would include; loss good time and loss privileges (commissary, visitation, and access to phone). Criminal sanctions would include prosecution. Sanctions would be proportionate to the nature and circumstances of the abuses committed, the inmates' disciplinary histories, and the sanctions imposed for similar offenses by other inmates with similar histories. Mental disability or mental illness is considered when determining sanctions.</p>

During an interview with mental health staff, the auditor was advised sexual abusers would receive individual therapy in-house. If warranted, the jail Psychologist would also evaluate the abuser. If an abuser refused treatment, this refusal would be communicated back to custody. Custody would review this information and make a determination on the inmate's access to future programming and other benefits.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.



115.81	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 146)</p> <p>Information regarding the identify of a victim reporting a sexual assault, and the facts of the report itself, shall be limited to those who need to know in order to make decisions concerning the victim's welfare and for local law enforcement/investigative purposes.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>All inmates at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.41 are offered a follow-up meeting with a medical or mental health practitioner. The follow-up meetings typically occur within 14 days of the intake screening.</p> <p>The auditor was provided with an Informed Consent Form that is used by medical and mental health staff.</p> <p>During the onsite audit, the auditor confirmed 100% of all inmates that previously disclosed sexual victimization were offered a follow up evaluation with mental health staff. The auditor randomly selected inmates who previously disclosed sexual victimization and requested documentation of their referral to mental health. The auditor was provided with this documentation and confirmed the referral was made within 14 days of the disclosure.</p> <p>Staff and Inmate Interviews</p> <p>During the interviews with inmates who disclosed prior sexual abuse, the auditor confirmed these inmates were offered a follow-up with mental health staff. These inmates acknowledged being seen by mental health within a few days of disclosing this information.</p> <p>During interviews with staff responsible for risk screening, the auditor confirmed inmates who disclose prior sexual abuse during the risk screening are offered a follow-up evaluation with mental health within 14 days of the screening.</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>

115.82	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>(Page 148)</p> <p>23. Health Care Services</p> <p>a. Victims shall be provide emergency and ongoing medical and mental health services as needed free of charge.</p> <p>b. Medical staff responsible for examination or treatment of sexual abuse or assault victims shall be specially trained or certified in such procedures (training for medical staff will be completed by the Medical Provider).</p> <p>c. Forensic examinations will be completed outside of the Worcester County Jail by a certified forensic nurse at Peninsula Regional Medical Center or Atlantic General Hospital. The forensic examinations will include SANEs or SAFEs completed by the certified nurse.</p> <p>d. Any inmate/detainee transported to Peninsula Regional Medical Center or Atlantic General Hospital for the purpose of a forensic examination will be offered the services of a victim advocate from the Life Crisis Center located in Salisbury, Maryland.</p> <p>e. If the victim is an ICE detainee the Salisbury Field Office Director will be notified prior to the transport of the detainee.</p> <p>f. If the victim is a Worcester County jail inmate the Chief Administrative Officer will be notified prior to the transport of the inmate.</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>Inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services.</p> <p>The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment.</p> <p>Inmate victims of sexual abuse while incarcerated are 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.</p> <p>Staff and Inmate Interviews</p> <p>During interviews with medical and mental health staff, the auditor confirmed inmate victims of sex abuse receive timely and unimpeded access to emergency medical treatment and crisis intervention services. These services are provided immediately after medical and mental health staff are notified. The nature and scope of these services are determined according to their professional judgement. Victims of sexual abuse are offered timely information about access to emergency contraception and sexually transmitted infection prophylaxis.</p>

During an interview with an inmate who reported sexual abuse, the auditor confirmed the inmate was seen by medical staff immediately after the incident was reported. The inmate stated she spoke with mental health staff the following day.

During interviews with random staff, as well as staff who have acted as first responders, the auditor confirmed staff were well aware of their first responder duties.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.83	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 148)</p> <p>23. Health Care Services</p> <p>a. Victims shall be provided emergency and ongoing medical and mental health services as needed free of charge.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The facility offers 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.</p> <p>Female victims of sexual abusive vaginal penetration while incarcerated are offered pregnancy tests. If pregnancy results from sexual abuse while incarcerated, victims receive timely and comprehensive information about, and timely access to, all lawful pregnancy-related medical services.</p> <p>Inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.</p> <p>Staff and Inmate Interviews</p> <p>During interviews with medical and mental health staff, the auditor confirmed evaluation and treatment of inmates who have been victimized involves; reassuring the inmate that all information discussed is confidential, conduct a medical evaluation, transport the inmate to the hospital for specialized treatment (when appropriate), conducting follow-up evaluations once the inmate returns to the facility. In addition, mental health staff would conduct an initial evaluation and provide follow up treatment (when appropriate). Medical and mental health services are consistent with community level care services. If pregnancy results from sexual abuse while incarcerated, inmate victims are given timely information and access to all lawful pregnancy –related services. This information would be provided as soon as the pregnancy is discovered.</p> <p>During an interview with an inmate who reported sexual abuse, the auditor confirmed the inmate spoke with medical and mental health staff the same day she reported the abuse. The inmate acknowledged speaking with medical and mental health staff again about a week later. The inmate stated her allegation only involved touching; therefore, she was never offered testing for sexually transmitted infections. The inmate stated she was never required to pay for any of the medical treatment she received in response to this incident.</p>	

Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.86	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 150) 27. Sexual Abuse Incident Reviews</p> <p>The PREA Coordinator for the Worcester County Jail in conjunction with the Warden of the Worcester County Jail will conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation to assess and improve prevention and response efforts. The review will be completed within 30 days of the conclusion of the investigation.</p> <p>During the review, input from additional facility staff members including supervisors, medical, or mental health staff will be considered.</p> <p>The review shall include consideration as to whether the results of the investigation will require a change in policy or change in practice to prevent, detect, or respond to sexual abuse.</p> <p>Consideration will be given as to the allegation being motivated by race, ethnicity, gender identity, lesbian, gay, bisexual, transgender, or intersex identification status, or perceived status, or gang affiliation, or was motivated or otherwise caused by the other group dynamics at the facility.</p> <p>The areas in the facility where the incident allegedly occurred will be examined to assess where physical barriers in the area may enable abuse.</p> <p>The staffing levels will be assessed to ensure adequate supervision is available on all shifts.</p> <p>The video surveillance system will be reviewed to ensure adequate coverage is provided and recommend additional cameras to areas as needed to increase the ability to monitor the facility.</p> <p>Any recommendation for improvement will be made to the Warden of the Worcester County Jail in writing.</p> <p>The facility will document the inability to make improvements recommended.</p> <p><b>Additional Documentation/Observations from Facility Tour</b></p> <p>In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility, excluding only "unfounded" incidents: 3</p> <p>In the past 12 months, the number of criminal and/or administrative investigations of alleged</p>

sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents: 3

During the onsite audit, the auditor was provided with a sample of the sexual abuse incident reviews. All reviews occurred within 30 days of the completion of the investigation.

#### Staff and Inmate Interviews

During an interview with the Acting Warden/PREA Coordinator, the auditor confirmed the facility has a sexual abuse incident review team which consists of upper-level management officials, and allows for inmate from line supervisors, investigators, and medical or mental health practitioners. The review team uses the information from the review to determine whether or not the agency policy needs to be revised and/or expanded.

During an interview with the Acting Warden/PREA Coordinator, as well as with another member of the sexual abuse incident review team, the auditor confirmed the review team considers 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; and/or other group dynamics at the facility. In addition, the review team: examines the area in the facility where the incident allegedly occurred to assess whether physical barriers may have enabled the abuse, assesses the adequacy of staffing levels in the area during different shifts, and assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.

#### Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.87	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 151) 28. Data Collection</p> <p>The Worcester County Jail will use the Survey of Sexual Victimization Incident Form from the U.S. Department of Justice to collect data from all reports of sexual abuse or sexual assault. The Worcester County Jail will provide the Department of Justice with data annually, as requested.</p> <p>All case records associated with claims of sexual abuse, including incident reports, investigative reports, offender information, disposition, medical and mental counseling evaluation findings, and recommendations for post release treatment and/or counseling, shall be maintained by the Warden of the Worcester County Jail.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>The auditor was provided with aggregated data collected in January 2016 and January 2017.</p> <p>During the site visit, the auditor was provided with SSV forms containing statistical data that was collected for each incident in 2016 and 2017.</p> <p>The Department of Justice did not request data from the facility in 2016.</p> <p>Staff and Inmate Interviews</p> <p>N/A</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>



115.88	<b>Data review for corrective action</b>
	<p data-bbox="248 168 898 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="248 248 523 284"><b>Auditor Discussion</b></p> <p data-bbox="248 329 504 365">Supporting Policies</p> <p data-bbox="248 409 959 445">Worcester County Jail Policies and Procedures states:</p> <p data-bbox="248 499 472 535">(Pages 151-152)</p> <p data-bbox="248 539 501 575">28. Data Collection</p> <p data-bbox="248 624 1452 790">The Worcester County jail will use the Survey of Sexual Victimization Incident Form from the U.S. Department of Justice to collect data from all reports of sexual abuse or sexual assault. The Worcester County Jail will provide the Department of Justice annually with data as requested.</p> <p data-bbox="248 840 1417 1005">All case records associated with claims of sexual abuse, including incident reports, investigative reports, offender information, disposition, medical and counseling evaluation findings, and recommendations for post release treatment and/or counseling shall be maintained by the Warden of the Worcester County Jail.</p> <p data-bbox="248 1055 1477 1131">The Warden of the Worcester County Jail will maintain two types of files regarding incidents of sexual abuse:</p> <p data-bbox="248 1180 528 1216">General files include:</p> <ul data-bbox="248 1265 1458 1606" style="list-style-type: none"> <li>a) Information about the victim or victims and assailant or assailants of a sexual assault (including the race, nationality, age, and gender of the individuals).</li> <li>b) Crime characteristics (including the date, time, location, and nature of the incident).</li> <li>c) Detailed reporting timeline, including the name of the staff member receiving the report of sexual assault, date, and time the report was received, and steps taken to communicate the report up the chain of command.</li> <li>d) All formal and/or informal action taken (including housing/custody placements, health care referrals).</li> </ul> <p data-bbox="248 1655 775 1691">Administrative investigative files include:</p> <ul data-bbox="248 1740 1458 1991" style="list-style-type: none"> <li>a) All reports including medical documentation of any injuries sustained and examinations, testing, or treatment provided.</li> <li>b) Any supporting evidentiary materials such as videotapes or audio recordings pertaining to the allegation or allegations.</li> <li>c) All information shall be shared only on a need to know basis with staff involved in the treatment of the victim or the investigation of the incident.</li> </ul> <p data-bbox="248 2040 1465 2157">The PREA Coordinator shall review aggregate data on an annual basis, and present the findings to the Warden who will present the findings to the appropriate agencies including the ICE Field Office Director, ICE/ERO headquarters, and the Chief Administrative Officer for</p>

Worcester County Jail. The findings will be used to determine whether changes may be needed to existing policies and practices in order to further the goal of eliminating sexual abuse.

The review shall:

- a. include a comparison of the current year's data and corrective actions with those from prior years.
- b. provide an assessment of the agency's progress in addressing sexual abuse.
- c. limit the material redacted from an annual report for publication, to specific materials where publication would present a clear and specific threat to the safety and security of the facility. The nature of the information redacted will be indicated on the review.

Data Review for Corrective Action: The Worcester County Jail will review data collected and aggregated to assess and improve the effectiveness of the Sexual Abuse Prevention, Detection, Response Policies, and Training and will include the following areas:

- a. Identification of problem areas;
- b. Corrective action;
- c. Preparing an annual report of the findings from the data review and corrective action.

#### Additional Documentation/Observations from Facility Tour

The auditor was provided with an annual report from January 2016 and January 2017. The reports include a summary of the data collected, as well as corrective actions taken. The annual report includes a comparison of the current year's data and corrective actions with those from prior years. The annual report provides an assessment of the agency's progress in addressing sexual abuse. During the pre-audit, the auditor notated these reports did not contain a signature block for the Agency Head; however, these reports were signed off on by the PREA Coordinator. At the time of the site visit, the auditor discovered the PREA Coordinator was the Acting Warden. For this reason, the auditor determined the facility meets this portion of the standard.

There is information posted on the agency website that states the annual data review is available for review by submitting an open records request from the Worcester County Commissioners Office.

#### Staff and Inmate Interviews

During an interview with the Acting Warden/PREA Coordinator, the auditor confirmed incident-based sexual abuse data is collected. The facility reviews all incidents and reviews the area where the incidents allegedly occurred. The facility uses information obtained from the review in order to determine whether or not policy was followed and/or whether or not policy needs to be revised to make the facility a safer place. The Warden/PREA Coordinator approves all annual reports. All data is securely retained. Corrective action is taken on an ongoing basis, as needed. The Warden/PREA Coordinator prepares an annual report of findings from its data review, and outlines any corrective actions the facility/agency takes. All personal identifiers are redacted from the report.

Final Determination

Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.

115.89	Data storage, publication, and destruction
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Supporting Policies</p> <p>Worcester County Jail Policies and Procedures states:</p> <p>(Page 151)</p> <p>Data storage, publication, and destruction:</p> <p>The Worcester County Jail will ensure that incident based and aggregate data is securely retained. The Worcester County Jail will prepare an annual report of aggregated sexual abuse data and the report will be available for review by the public upon the receipt of an open records request. A poster will be placed in the visitation lobbies containing information regarding the Prison Rape Elimination Act to include: how to report sexual abuse, the investigation of sexual abuse, and the procedure for requesting a copy of the annual report by obtaining an open records request from the Worcester County Commissioner's Office. The Worcester County Jail shall maintain sexual abuse data collected pursuant to PREA Standard 115.87 for at least 10 years after the date of initial collection.</p> <p>Additional Documentation/Observations from Facility Tour</p> <p>During the site visit, the auditor was provided with data collected from SSV forms for all incidents in 2016 and 2017.</p> <p>Staff and Inmate Interviews</p> <p>During the interview with the Acting Warden/PREA Coordinator, the auditor confirmed the agency reviews 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, and training. This data is securely retained by the Warden/PREA Coordinator. Corrective action is taken on an ongoing basis, as needed.</p> <p>Final Determination</p> <p>Based on the information discovered in the agency's policies, observations made during the onsite audit, as well as information obtained through staff and inmate interviews, the auditor has determined the agency/facility meets the above standard.</p>

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor confirmed the facility went through a PREA audit during Audit Cycle One. The auditor was provided with a copy of the PREA Audit Final Report which was dated April 24, 2015.</p> <p>Worcester County Jail had its audit conducted in April 2015; however, the auditor documented there would not be any corrective action for this standard due to the fact that the audit was conducted during year two of Audit Cycle One.</p> <p>The auditor was given access to, and the ability to observe all areas of the facility.</p> <p>The auditor was permitted to request and receive copies of any relevant documents (including electronically stored information).</p> <p>The auditor provided the facility with a notification of audit six weeks prior to the onsite audit. The auditor listed his mailing address on the notification. During the site visit, the auditor confirmed inmates were permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.</p>

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor reviewed the agency's website and located the PREA Audit Final Report from Audit Cycle One. The auditor confirmed with the facility that this audit report would be posted on the agency website once it is submitted.</p>

## Appendix: Provision Findings

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

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

115.11 (c)	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	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)	<b>Contracting with other entities for the confinement of inmates</b>	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	yes

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

<b>115.17 (c)</b>	<b>Hiring and promotion decisions</b>	
	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

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

<b>115.17 (e)</b>	<b>Hiring and promotion decisions</b>	
	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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

<b>115.33 (d)</b>	<b>Inmate education</b>	
	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

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

<b>115.33 (f)</b>	<b>Inmate education</b>	
	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

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

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

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

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

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

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

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

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

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



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

115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

115.52 (g)	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.)	yes

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

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

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

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

115.61 (a)	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

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

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

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

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

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

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

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

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

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



<b>115.66 (a)</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	During each one-year period starting on August 20, 2013, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited?	yes

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

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

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

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

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