

# PREA Facility Audit Report: Final

**Name of Facility:** Branchville Correctional Facility

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 08/10/2021

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> sonya love	<b>Date of Signature:</b> 08/10/2021

AUDITOR INFORMATION	
<b>Auditor name:</b>	Love, Sonya
<b>Email:</b>	sonya.love57@outlook.com
<b>Start Date of On-Site Audit:</b>	06/14/2021
<b>End Date of On-Site Audit:</b>	06/16/2021

FACILITY INFORMATION	
<b>Facility name:</b>	Branchville Correctional Facility
<b>Facility physical address:</b>	21390 Old State Road 37, Branchville, Indiana - 47514
<b>Facility Phone:</b>	
<b>Facility mailing address:</b>	

Primary Contact	
<b>Name:</b>	Teresa James
<b>Email Address:</b>	tjames1@idoc.in.gov
<b>Telephone Number:</b>	812-843-4204

Warden/Jail Administrator/Sheriff/Director	
<b>Name:</b>	Frank Littlejohn
<b>Email Address:</b>	FLittlejohn@idoc.in.gov
<b>Telephone Number:</b>	812-843-4205

Facility PREA Compliance Manager	
<b>Name:</b>	Teresa James
<b>Email Address:</b>	tjames1@idoc.in.gov
<b>Telephone Number:</b>	O: 812-843-4204

Facility Health Service Administrator On-site	
<b>Name:</b>	Richard Wright
<b>Email Address:</b>	richard.wright@wexfordindiana.com
<b>Telephone Number:</b>	812-843-5150

Facility Characteristics	
<b>Designed facility capacity:</b>	1533
<b>Current population of facility:</b>	1244
<b>Average daily population for the past 12 months:</b>	1446
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>Which population(s) does the facility hold?</b>	Males
<b>Age range of population:</b>	18-75
<b>Facility security levels/inmate custody levels:</b>	Level 2 Medium Security
<b>Does the facility hold youthful inmates?</b>	No
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	245
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	50
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	0

AGENCY INFORMATION	
<b>Name of agency:</b>	Indiana Department of Correction
<b>Governing authority or parent agency (if applicable):</b>	State of Indiana
<b>Physical Address:</b>	302 W Washington St., IGCS, RM E334, Indianapolis, Indiana - 46204
<b>Mailing Address:</b>	
<b>Telephone number:</b>	317-232-5711

Agency Chief Executive Officer Information:	
<b>Name:</b>	Robert Carter
<b>Email Address:</b>	rocarter1@idoc.in.gov
<b>Telephone Number:</b>	317-232-5711

Agency-Wide PREA Coordinator Information			
<b>Name:</b>	Bryan Pearson	<b>Email Address:</b>	bpearson@idoc.in.gov

## AUDIT FINDINGS

### **Narrative:**

The auditor's description of the audit methodology should include a detailed description of the following processes during the pre-audit, on-site audit, and post-audit phases: documents and files reviewed, discussions and types of interviews conducted, number of days spent on-site, observations made during the site-review, and a detailed description of any follow-up work conducted during the post-audit phase. The narrative should describe the techniques the auditor used to sample documentation and select interviewees, and the auditor's process for the site review.

The Auditor used a data triangulated model to confirm PREA compliance with each standard and substandard. The triangulation model compares, and contrast two or more data points obtained from different sources to confirm PREA compliance. Using a data triangulation or cross examination model provides the Auditor with a dual method or in some cases a three-way method to confirm data obtained from multiple sources regarding a standard. Ideally, the triangulated model enhances reliability of data collected and analyzed about a specific facility or agency's overall compliance with the Prison Rape Elimination Act (PREA).

To gain compliance a facility was required to meet each standard. To meet each standard the Auditor relied upon several factors such as: Resident interviews (random and targeted), the facility tour, staff interviews (random and specialized) (contractor and agency staff) and documented evidence of compliance with an applicable standard. The number of residents interviewed was determined by the required inmate interviews, Table 1. For Branchville , the interview minimum was 40 inmates. The Auditor interviewed 12 random Branchville staff and 16 specialized staff. It should be mentioned due in part to the facility size some staff functioned in double and triple roles in the facility.

## AUDIT FINDINGS

### Facility Characteristics:

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

Branchville Correctional Facility is an Indiana Department of Correction state prison for men, located in Branchville, Perry County, Indiana, on the southern edge of the state. The prison is a medium-security facility with dormitory style accommodations. Branchville was opened in 1982 and has a capacity of 1,533. As of 2019, the prison housed 1,448 inmates, and employed 256 staff. Average inmate population is 1446. Age of the inmate population 18-75 years old. On the first day of the audit the population total was 1169. Medical, mental health and education services are provided onsite. The facility has a full kitchen with seating to accommodate the population.

### Programs

\*During normal operations the below list of programs are offered to offenders who meet participation criteria. For the health and safety of all, some programs may be restricted or temporarily suspended.

The Indiana Department of Correction offers a wide selection of programming, courses, and activities based on both facility and offender need, as well as available resources. Listed below are a number of current programming opportunities available at the facility. While some are led by staff, many are volunteer-driven. If you are interested in learning more about volunteer opportunities, please visit our Volunteer page. For more information on these programs and/or a complete listing of the programs the IDOC offers, please visit the IDOC Programs page.

Substance Abuse  
Thinking for a Change  
PLUS Program  
Inside Out Dads  
AA/NA  
GED  
First Time Last Time  
Literacy  
Adult Basic Education  
Indiana Correctional Industry Products (ICI)  
Pre Release  
Anger Management  
Therapeutic Community  
Culinary Arts

**AUDIT FINDINGS****Summary of Audit Findings:**

The OAS will automatically calculate the number of standards exceeded, number of standards met, and the number of standards not met based on the auditor's compliance determinations. If relevant, the auditor should provide the list of standards exceeded and/or the list of standards not met (e.g. Standards Exceeded: 115.xx, 115.xx..., Standards Not Met: 115.yy, 115.yy ). Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

<b>Number of standards exceeded:</b>	0
<b>Number of standards met:</b>	41
<b>Number of standards not met:</b>	0
<b>Not audited at the facility level:</b> Audited at the agency-level, and not relevant to the facility-level audit because the facility has no independent responsibility for the operation of these standards.	4

OAS will automatically calculate the number of standards exceeded, number of standards met, and the number of standards not met based on the auditor's compliance determinations. The following standards require correction action:

115.41

115.42

**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	<p data-bbox="229 69 1509 1245"><b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b></p> <p data-bbox="229 136 1509 192"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="229 192 1509 248"><b>Auditor Discussion</b></p> <p data-bbox="229 248 1509 349">IDOC Policy 02-02-115, Sexual Abuse Prevention established that the agency has a written policy. The written policy mandates zero tolerance toward all forms of sexual abuse and sexual harassment as outlined in Policy 02-01-115.</p> <p data-bbox="229 349 1509 506">A review of the organization chart identifies that a PREA Coordinator has been designated by the IDOC and a Compliance Manager was designated by Branchville Correctional Facility. The position of PREA Coordinator is a member of IDOC upper level of the agency hierarchy. During his interview, the PREA Coordinator confirmed that he has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all its facilities.</p> <p data-bbox="229 506 1509 685">Likewise, Branchville Correctional Facility designated a Community Service Worker 3 as the PREA Compliance Manager for the facility. The PREA Compliance Manager/Community Service Worker 3 reports to the Warden for all matters relative to PREA compliance. During her interview, the PREA Compliance Manager confirmed that she had sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards at the facility. Branchville Correctional Facility met the requirements of Standard 115.11.</p> <p data-bbox="229 685 1509 730"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="229 730 1509 1245" style="list-style-type: none"> <li data-bbox="229 730 1509 786">• Pre-Audit Questionnaire</li> <li data-bbox="229 786 1509 842">• Policy 02-01-115 (Sexual Abuse Prevention)</li> <li data-bbox="229 842 1509 898">• Interview with the PREA Compliance Manager</li> <li data-bbox="229 898 1509 954">• Branchville Correctional Facility job description for Case Manager Worker</li> <li data-bbox="229 954 1509 1010">• Branchville Correctional Facility Organizational Chart dated January 2021</li> <li data-bbox="229 1010 1509 1066">• Interview with the PREA Coordinator</li> <li data-bbox="229 1066 1509 1178">• Document review: Indiana Department of Corrections, Adult Disciplinary Process, Offenses and Sanctions dated March 1, 2020</li> <li data-bbox="229 1178 1509 1245">• Memorandum: Designation of a Branchville PREA Compliance Manager dated March 29, 2021</li> </ul>
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<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The agency has contracts for services. All applicable contractors are required to adopt and comply with PREA standards. Branchville Correctional Facility met the requirements of Standard 115.12.</p> <p><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Interview with PREA Coordinator</li> <li>• IDOC sample contracts</li> </ul>

<b>115.13</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy 02-01-115, Sexual Abuse Prevention addresses Standard 115.13. Unannounced rounds were documented in facility logbooks. Unannounced rounds are conducted by a Lieutenant and members of management. Random unannounced rounds were selected and reviewed from the facility logbooks. The facility operates 24 hours per day on twelve-hour (12) hour shifts and unannounced rounds were documented on each shift. Managers conducting unannounced rounds have a procedure in place of alternating their route of conducting unannounced rounds to identify and deter staff sexual abuse and sexual harassment and prevent staff from alerting other staff.</p> <p>The PREA Compliance Manager provided updated staffing plans that documents at least once every year the agency or facility, in collaboration with the agency's PREA Coordinator, reviewed the staffing plans to see whether adjustments are needed. Branchville met the requirements of Standard 115.13.</p> <p><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul style="list-style-type: none"> <li>• Policy 02-01-115 (Sexual Abuse Prevention)</li> <li>• Pre-Audit Questionnaire</li> <li>• American Correctional Association 2020 compliance audit</li> <li>• Branchville 2021 Facility Staffing Plan Review</li> <li>• Branchville 2020 Facility Staffing Plan Review</li> <li>• Branchville 2019 Facility Staffing Plan Review</li> <li>• Branchville Correctional Facility Master Shift Roster</li> <li>• Branchville Correctional Facility Vacancy Report dated 2018/2019</li> <li>• Branchville Correctional Facility Vacancy Report, dated 1/2/2019 from August 2017- January 2019, 7.7% vacancy rate</li> <li>• Institution Capacity/Shift Roster/Logbook</li> <li>• Auditor review of unannounced rounds, January 2021, December 2020, March 2021</li> <li>• Interviews with PREA Coordinator</li> <li>• Interview with the PREA Compliance Manager</li> <li>• Interviews with staff who conduct unannounced rounds</li> </ul>

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Branchville Correctional Facility do not house youthful offenders. Branchville Correctional Facility met the requirements of Standard 115.14.</p> <p><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 01-04-102 (Classification Assignments for Youth Incarcerated as Adults and Alternatively Sentenced Youth)</li> <li>• Daily Population Reports</li> <li>• Interviews with the PREA Coordinator and PREA Compliance Manager</li> </ul>

<b>115.15</b>	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="242 210 451 235"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1485 499">Policy 02-03-101, Searches and Shakedowns and Policy 02-10-1118 address the requirements in Standard 115.15. For example, Policy 02-03-101 indicates that "...except during an emergency as declared by the Warden or designee, a strip search must afford the offender reasonable privacy and shall be conducted by staff of the same gender. Opposite gender strip searches of an offender shall not be conducted unless the opposite gender staff member, in his/her professional judgment, has reasonable cause to believe that a delay in retrieving possible prohibited property would jeopardize the safety, order, and/or security of the facility. If a strip search is conducted by an opposite gender staff member, the strip search shall be documented on an Incident Report and submitted to the Custody Supervisor or designee."</p> <p data-bbox="242 530 1469 656">Staff detailed for the Auditor the facility requirements for opposite gender, transgender, and intersex searches of inmates during random staff interviews. There were twelve (12) random staff interviews conducted. Likewise, twelve (12) random staff training files were reviewed and confirmed that all staff received training on the facility policy that does not allow cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat down searches be conducted.</p> <p data-bbox="242 665 1481 757">During his interview, the Warden confirmed that Branchville Correctional Facility had zero occurrences of cross-gender strip searches or visual body cavity searches within the last twelve months. Branchville Correctional Facility meets the requirements of Standard 115.15.</p> <p data-bbox="242 788 879 813"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="242 844 847 1444" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 02-03-101 (Searches and Shakedowns)</li> <li>• Policy 02-01-118 (Transgender and Intersex Offenders)</li> <li>• Interview with the Warden</li> <li>• Training acknowledgment sheets and curriculum</li> <li>• Interview with the PREA Compliance Manager</li> <li>• Inmate handbook</li> <li>• Interview with inmates (random and targeted)</li> <li>• Interview with staff (random and specialized)</li> <li>• Interview with the PREA Coordinator</li> <li>• Facility tour</li> </ul>

<b>115.16</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 1489 398">Policy ISP16-03 (Telephonic and In Person Interpretive Service) and Policy 02-01-115 (Sexual Abuse Prevention) address the policy requirements of Standard 115.16. The agency has established procedures to provide disabled inmates 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.</p> <p data-bbox="240 434 1489 560">IDOC takes 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. They have an on- going Memorandum of Understanding (MOU) to provide inmates with disabilities or who are limited English proficient with any needed assistance. The facility is equipped with posters in alternate languages such as Spanish to ensure inmate education.</p> <p data-bbox="240 595 1489 810">IDOC utilizes an "Over-the-phone" interpretive service that can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. These "Over-the-phone" services are available 24 hours a day. The facility provided invoices of the use of interpretive services. During random interviews (100%) facility staff confirmed that they 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. The facility also has a list of staff members' that are utilized as interpreters.</p> <p data-bbox="240 846 1489 1061">Moreover, Branchville Correctional Facility employs interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. Branchville Correctional Facility provided invoices confirming the use of interpretive services. 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 was one (1). Branchville Correctional Facility also maintains list of staff members' that can be utilized as interpreters. Branchville Correctional Facility met the requirements of Standard 115.16.</p> <p data-bbox="240 1097 879 1124"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 1160 1023 1877" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 02-01-115 (Sexual Abuse Prevention)</li> <li>• Policy ISP16-03 (Telephonic and In Person Interpretive Service)</li> <li>• Instruction card/list of staff Interpreters/Invoice of professional services</li> <li>• Interview with inmates (random and targeted)</li> <li>• Interview with staff (random and specialized)</li> <li>• Interview with the PREA Coordinator/designated agency head</li> <li>• Facility tour</li> <li>• Review of various forms translated into languages other than English</li> <li>• Adult Offender Handbook (Spanish/English)</li> <li>• PREA literature (Spanish/English)</li> <li>• Ombudsman Third-Party Reporting Notice (English/Spanish)</li> <li>• Interpretive service contract, Propio LS LLC 2021</li> </ul>

115.17	<b>Hiring and promotion decisions</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1469 432">Policy 04-03-102, Human Resources and Policy 04-03-103, Information and Standards of Conduct for Departmental Staff, prohibits the hiring or promotion of anyone who may have contact with inmates, and prohibits enlisting the 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) addresses the policy requirements of Standard 115.17.</p> <p data-bbox="242 463 1485 624">Indiana Department of Correction has a policy that requires criminal background records checks be conducted at least every five years of current employees and contractors who may have contact with inmates. Branchville Correctional Facility provided Policy 04-03-103, that supports compliance of the standard. Policy 04-03-103, Information and Standards of Conduct for Departmental Staff was reviewed by the Auditor. Additionally, IDOC provided the Auditor with a blank copy of an applicant's pre-employment questionnaire.</p> <p data-bbox="242 656 1490 983">The Human Resource Manager (HRM) was interviewed during the audit. The HRM confirmed that the agency prohibits 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. The agency considers material omissions regarding such misconduct, or the provision of materially false information, grounds for termination. The PREA Coordinator confirmed in his interview that the agency asks 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 and provided evidence. Furthermore, the PREA Coordinator affirmed the agency imposes upon employees a continuing affirmative duty to disclose any such misconduct and he also provided evidence in the form of the employment application form for the Indiana Department of Corrections.</p> <p data-bbox="242 1014 1490 1176">The Warden, he confirmed during her interview that IDOC prohibits 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. The PREA Coordinator provided the Auditor with 6 examples of the agency providing information to potential employers on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.</p> <p data-bbox="242 1207 1461 1332">Policy 04-03-103, Information and Standards of Conduct for Departmental Staff prohibits hiring or promoting anyone who may have contact with inmates and prohibits enlisting the 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) and addresses the requirements of Standard 115.17.</p> <p data-bbox="242 1364 1485 1525">Policy 04-03-103 requires that criminal background records checks be conducted at least every four (4) years of current employees and contractors who may have contact with inmates. The Auditor reviewed a blank copy of an applicant's questionnaire. The Auditor also interviewed a representative from Human Resources. In the past 12 months, the number of contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with inmates was four (4). Branchville Correctional Facility met the requirements of Standard 115.17.</p> <p data-bbox="242 1556 879 1585"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="242 1617 1117 2101" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 04-03-102 Human Resources</li> <li>• Policy Statement: Discipline</li> <li>• Policy 04-03-103 Information and Standards of Conduct for Departmental Staff</li> <li>• Interviews with staff (random, specialized and contract)</li> <li>• Interview with the Human Resources representative</li> <li>• Interview with the PREA Compliance Manager</li> <li>• Review of applicant questionnaire</li> <li>• Criminal background checks (17) Branchville Correctional Facility staff</li> </ul>

<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Branchville Correctional Facility Correctional Facility indicated on their Pre-Audit questionnaire they have acquired new facility additions and made substantial expansions or modifications to the existing facility since August 20, 2012. The PREA Compliance Manager indicated that the facility completed a minor installed and updated the video monitoring system in the pallet shop and the laundry department since the last audit. PREA and protection of inmates from sexual assault was a contributing factor in the designation of the locations to install new cameras in the facility. Branchville met the requirements of Standard 115.18</p> <p><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Observations of the Auditor during the on-site tour</li> </ul>

115.21	<b>Evidence protocol and forensic medical examinations</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The agency/facility is responsible for conducting administrative sexual abuse investigations (including inmate-on-inmate sexual abuse or staff sexual misconduct). The agency/facility is responsible for conducting criminal sexual abuse investigations (including inmate-on-inmate sexual abuse or staff sexual misconduct). Likewise, when conducting a sexual abuse investigation, the agency investigators follow a uniform evidence protocol according to the PREA Coordinator. Branchville does not house youthful inmates in this population therefore 115.21 (b)-1 does not apply to this facility.</p> <p>Indiana Code (IC) 11-10-3-5, Co-payment Requirements; exceptions outline circumstances when an inmate is not required to pay for medical services such as (1) the service is provided in an emergency; (2) the service is provided because of an injury received in a correctional facility; or (3) the service is provided at the request of the administrator of a correctional facility. IDOC offers all inmates who experience sexual abuse access to forensic medical examinations, without financial cost, where evidentiary or medically appropriate.</p> <p>The facility provided a memo confirming that inmates can be taken to Deaconess Gateway Hospital. The Indiana Coalition Against Domestic Violence would provide emotional support to the victim. A call was made to the Director of the program to verify that Branchville Correctional Facility has a MOU with the Indiana Coalition Against Domestic Violence. The protocol was adapted from or otherwise based on the most recent edition of the DOJ's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011.</p> <p>The services provided are as follows:</p> <ul style="list-style-type: none"> <li>• Examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs); SAFEs or SANEs are available 24 hours and seven days a week (documented in the MOU)</li> <li>• Victim advocacy, emotional support, crisis intervention, information, and referrals.</li> </ul> <p>Staff (random and specialized) interviews demonstrated that (100%) of staff were knowledgeable about the Memorandum of Understanding with Deaconess Gateway Hospital and the Indiana Coalition Against Domestic Violence and all were able to verbalize who the agreements were with and what services they provided. The number of exams performed by SANEs/SAFEs during the past 12 months was zero. The number of forensic medical exams conducted during the past 12 months was zero. The number of exams performed by a qualified medical practitioner during the past 12 months was zero. Branchville Correctional Facility met the requirements of Standard 115.21.</p> <p><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 00-01-103 Investigation and Intelligence</li> <li>• First Responders Evidence Protocol and Investigations Presentation Guide</li> <li>• Memorandum of Understanding with Indiana Coalition Against Domestic Violence</li> <li>• Memorandum: Wexford Health Service Administrator regarding contact information for Deaconess Gateway Hospital and certified SANE Nurses Evidence Collection Table/Sexual Assault Evidence Protocols</li> <li>• Memorandum: Health Service Administrator SANE nurse and Deaconess Gateway Hospital</li> <li>• List of medical and mental health employees and copies of certificates of completion of specialized training</li> <li>• Interviews with staff (random and specialized)</li> <li>• Telephone conversation with staff from the Deaconess Gateway Hospital and the Indiana Coalition Against Domestic Violence</li> <li>• Interviews with the PREA Compliance Manager and PREA Coordinator</li> </ul>



115.22	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="229 192 1509 255"><b>Auditor Discussion</b></p> <p data-bbox="229 255 1509 367">IDOC Policy 02-01-115, Sexual Abuse Prevention is in place to ensure that allegations of sexual abuse or sexual harassment are investigated by a legal authority to conduct criminal investigations. The agency's policy regarding the referral of allegations of sexual abuse or sexual harassment for criminal investigation is published on the agency website.</p> <p data-bbox="229 367 1509 434">The agency has a practice that documents all PREA related investigations. Branchville Correctional Facility met the requirements of Standard 115.22.</p> <p data-bbox="229 434 1509 479"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="229 479 1509 1021" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 02-01-115 Sexual Abuse Prevention</li> <li>• Policy 00-01-103 Investigations and Intelligence</li> <li>• Review of investigative file</li> <li>• Interview with the PREA Coordinator and Office of Investigation and Intelligence</li> <li>• Interview with an Investigator</li> <li>• Review of the agency website</li> <li>• Interview with the Warden</li> <li>• Interviews with staff (random and specialized)</li> </ul>

<b>115.31</b>	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 453 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1485 801">IDOC Policy 02-01-115, Sexual Abuse Prevention is in place to ensure that allegations of sexual abuse or sexual harassment addresses this standard. In accordance with Standard 115.31 (a), the agency trains all employees who may have contact with inmates on the agency's zero-tolerance policy for sexual abuse and sexual harassment. The agency trains all employees who may have contact with inmates on the right of inmates to be free from sexual abuse and sexual harassment. The agency trains 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. The employee shall receive additional training if the employee is reassigned from a facility that houses only female inmates, or vice versa. A total of 12 random and 16 specialized training files were reviewed totaling 28 files reviewed. All 28 training files reflect that staff received the appropriate training. Of the 28 random files those requiring refresher training had received training yearly. The training curriculums provided by the facility included coverage of a lesson plan for training on PREA. More, such training is tailored to the gender of the inmates at the Branchville facility. The PREA Compliance Manager indicated employee who transfer in from other facilities are all required to complete PREA orientation which is facility specific based on the gender of the population (adult/male). According to the PREA Coordinator and the PREA Compliance Manager, between mandatory annual PREA related trainings the agency provides employees who may have contact with inmates with refresher information about current policies regarding sexual abuse and sexual harassment using electronic media or shift briefings. Branchville met the requirements of Standard 115.31.</p> <p data-bbox="240 831 879 857"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 887 1230 1373" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 02-11-115 Sexual Abuse Prevention</li> <li>• Indiana Training Plan/Security Skills /Learning Plan Transcript/ Acknowledgment of Receipt</li> <li>• Auditor review of training files</li> <li>• Auditor review of training curriculum/brochures</li> <li>• Interviews with staff</li> <li>• Interview with the PREA Compliance Manager</li> <li>• Interview with the PREA Coordinator</li> <li>• PREA Lesson Plan</li> </ul>

<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 208 453 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1493 566">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. All volunteers and contractors who have contact with inmates have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents. Further, volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention and detection. The PREA Coordinator confirmed that 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 facility currently has fifty (50) volunteers and contractors. Volunteerism has been suspended for better than 18 months due to the pandemic. Zero volunteers were interviewed during this audit.</p> <p data-bbox="240 600 1461 757">The curriculum the agency utilized for training provides the level and type of training that is based on the services they provide and level of contact they have with inmates. The curriculum also covers the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informs contractors and volunteers how to report such incidents. The agency maintains documentation confirming that volunteers and contractors understand the training they have received. Branchville Correctional Facility met the requirements of Standard 115.32.</p> <p data-bbox="240 790 879 819"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 846 783 1160" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Indiana Contractor and Volunteer Manual</li> <li>• Interview with the PREA Coordinator</li> <li>• Interview with the PREA Compliance Manager</li> <li>• Acknowledgment of receipt of training</li> <li>• Interview with a contract employee</li> </ul>

115.33	<b>Inmate education</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1453 398">IDOC Policy 02-01-115, Sexual Abuse Prevention is in place to ensure that allegations of sexual abuse or sexual harassment addresses this standard. All inmates including transfers receive information at time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. The agency documents inmate trainings in institutional and clinical files.</p> <p data-bbox="242 488 1453 680">The number of inmates admitted during past 12 months who were given this information at intake was 435. A total of forty (40) inmate institutional and clinical files were reviewed to verify that inmates received information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment during their intake process. The handbooks and brochure covered how to report incidents or suspicions of sexual abuse or sexual harassment. The information was also provided for those who are limited English proficient, deaf, visually impaired or otherwise disabled. Inmates were knowledgeable of their rights.</p> <p data-bbox="242 770 1485 862">Within 72 hours of intake, the agency provides age-appropriate comprehensive education to inmates in person regarding their rights to be free from sexual abuse and sexual harassment, as well as their rights to be free from retaliation for reporting such incidents. This was verified through the review of forty (40) institutional and clinical files.</p> <p data-bbox="242 952 1485 1144">During intake, inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment. Likewise, during the same intake process inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment. In addition to providing such education the agency ensures that key information is continuously and readily available or visible to inmates through posters, and informal PREA groups. During the facility tour, the Auditor noted PREA related posters and advocacy information was displayed in Spanish and English, throughout the facility.</p> <p data-bbox="242 1234 1477 1561">Inmate orientation documents support that within 30 days of intake, Branchville provided a comprehensive education to inmates either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. The inmates interviewed during the audit were very versed in the grievance process and felt that their grievance would be addressed in a confidential and timely manner. Each inmate interviewed confirmed receiving PREA related education during the intake process in the form of a video, face-to-face meeting and PREA related brochures. PREA related information provided to inmates upon arrival to Branchville also included an inmate handbook. Inclusive in the handbook was the agency policies and procedures such as commissary information, mail, disciplinary codes and sanctions, trust fund information and administrative remedy process (grievance). Branchville Correctional Facility met the requirements of Standard 115.33.</p> <p data-bbox="242 1592 879 1621"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="242 1653 933 2078" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 02-01-115 (Sexual Abuse Prevention)</li> <li>• Auditor review of inmate education materials/inmate brochure</li> <li>• Inmate PREA education acknowledgment forms</li> <li>• Auditor review of inmate's files (40)</li> <li>• Interviews with staff (random and specialized)</li> <li>• Interviews with inmates (random and targeted)</li> <li>• Interviews with the PREA Coordinator</li> </ul>

**115.34 Specialized training: Investigations**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Policy 02-01-115, Sexual Abuse Prevention and 00-01-103, Office of Investigation and Intelligence address the IDOC's approach to Standard 115.34. Branchville has two (2) facility investigators who have completed the required training. The Office of Investigations is responsible for conducting investigations of alleged misconduct by staff and offenders and assisting in maintaining safety and security in the Department's facilities. Investigators are directed by policy to conduct investigations:

1. A prompt, thorough, and objective investigation of sexual abuse and/or sexual harassment shall begin:
  - a. As outlined in Investigating Allegations of Misconduct;
  - b. Upon activation of a facility SART team; and/or,
  - c. If determined to be necessary following an administrative review.
2. If the alleged sexual conduct involves an offender/youth under the age of eighteen (18), the incident shall be reported to the Child Protective Services as required in policy and Administrative Procedure 03-02-103, "The Reporting, Investigation, and Disposition of Child Abuse and Neglect." Branchville does not house youthful inmates.
3. Investigations of sexual abuse or sexual harassment shall be completed promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.
4. Investigators shall:
  - a. Gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data;
  - b. Interview alleged victims, suspected perpetrators, and witnesses; and,
  - c. Review prior complaints and reports of sexual abuse involving the suspected perpetrator.
5. The Garrity warning shall be used when interviewing staff for simple fact-finding.
6. An effort shall be made to determine whether staff actions or failures contributed to sexual abuse or sexual harassment.
7. An additional staff member, uninvolved in the case, shall be present during interviews, for one of the staff members to be of the same gender as the subject of the interview.
8. The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as offender, youth, or staff. No facility shall require an offender or youth who alleges sexual abuse to submit to a polygraph examination, voice stress analysis, or other truth-telling device as a condition for proceeding with the investigation of such an allegation.
9. The standard of measure for sexual abuse and sexual harassment administrative investigation is the preponderance of the evidence. When the evidence supports criminal prosecution, the agency shall consult with the prosecutor prior to conducting compelled interviews. Substantiated cases that appear to be criminal in nature shall be referred for prosecution.
10. The departure of the alleged perpetrator(s) or victim(s) from employment or custody/supervision will not warrant termination of an investigation. Outside law enforcement shall be contacted if this occurs.
11. Consultation with the prosecutor's office or Indiana State Police is permitted at any time during an investigation. If deemed appropriate, Indiana State Police may assist in an investigation of an act of sexual abuse or sexual harassment reported to facility investigators. Facility investigators shall be responsible for the coordination of all investigations.
12. Follow up with an offender's/youth's allegation of sexual abuse or sexual harassment shall be done in accordance with Policy 02-01-115, Sexual Abuse Prevention, examination of training files for investigators confirmed that each investigator completed specialized training in conducting investigations in confinement settings at least once.

Branchville Correctional Facility met the requirements of Standard 115.34.

**Policy, Materials, Interviews and Other Evidence Reviewed:**

- Pre-Audit Questionnaire
- Policy 02-01-115 (Sexual Abuse Prevention)
- Policy 00-01-103 (Investigation and Intelligence)
- Interview with the PREA Coordinator
- Interview with the PREA Compliance Manager
- Interview with the Warden
- Interview with the PREA investigator
- Moss Group Specialize Training Curriculum
- Certificate of Completion (NIC), Specialized Investigative Training, Christopher Dustin, PREA: Investigating Sexual Abuse in a Confinement Setting, dated April 9, 2015.
- Certificate of Completion (NIC), Specialized Investigative Training, Aaron Jonas, PREA: Investigating Sexual Abuse in a Confinement Setting, dated February 2, 2018.
- Certificate of Completion (NIC), Specialized Investigative Training, Ashley Kilgore, PREA: Investigating Sexual Abuse in a Confinement Setting, dated December 12, 2018
- Certificate of Completion (NIC), Specialized Investigative Training, Nicole Rodrigues dated February 7, 2018
- Certificate of Completion (NIC), Specialized Investigative Training, Willie Parnell, PREA: Investigating Sexual Abuse in a Confinement Setting, dated December 6, 2015.
- Training: The Moss Group, Specialized Investigative Training Certificate, Rhonda Brenner dated February 22-March 2, 2018
- Training: The Moss Group, Specialized Investigative Training Certificate, Callie Burke dated February 22-March 2, 2018
- Training: The Moss Group, Specialized Investigative Training Certificate, William Lesser dated February 22-March 2, 2018
- Training: The Moss Group, Specialized Investigative Training Certificate, Nicole Rodrigues dated February 22-March 2, 2018
- Training: The Moss Group, Specialized Investigative Training Certificate, Valerie Cronin dated February 22-March 2, 2018
- Training: The Moss Group, Specialized Investigative Training Certificate, Jeffery Hendershot dated February 22-March 2, 2018
- Training: The Moss Group, Specialized Investigative Training Certificate, Lawrence Litherland dated February 22-March 2, 2018

<b>115.35</b>	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 453 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1493 566">Policy 02-11-115, Sexual Abuse Prevention addresses the policy requirement for Standard 115.35. The agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. The number of all medical and mental health care practitioners who work regularly at this facility who received the training required by agency policy was 36. The percent of all medical and mental health care practitioners who work regularly at this facility and have received the training required by agency policy was 100%. The medical staff at Branchville Correctional Facility do not conduct forensic medical exams. Branchville maintains documentation that medical and mental health practitioners have received the required specialized and general PREA training referenced in this standard. The Auditor verified by examination training documents for medical and mental health staff. The documentation indicates that training was conducted, and that specialized staff was re-trained yearly. Branchville Correctional Facility met the requirements of Standard 115.35.</p> <p data-bbox="240 651 839 678">Policy, Materials, Interviews and Other Evidence Reviewed:</p> <ul data-bbox="240 768 1075 1081" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 02-11-115 (Sexual Abuse Prevention)</li> <li>• Interviews with Medical and Mental Health Staff</li> <li>• Interview with the PREA Coordinator</li> <li>• Review of specialized training certifications for medical and mental health staff</li> <li>• Wexford/Branchville Health Care Administrator</li> </ul>

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 1489 398">Policy 02-01-115, Sexual Abuse Prevention, requires screening (upon admission to a facility or transfer to another facility) for risk of being sexually abused by other inmates or sexually abusive toward other inmates. Policy 02-01-115 requires that inmates be screened for risk of sexual victimization or risk of sexually abusive behaviors within 72 hours of their arrival at Branchville.</p> <p data-bbox="240 434 1477 725">Problematic, based on a review of forty (40) institutional files, the facility did not complete SVAT's within 72 hours of arrival due to a safety imposed 14-day quarantine of new inmates for the Covid-19 virus. At the culmination of the 14-day quarantine, 100% of inmate who arrived 14 days prior to the facility their SVAT's were completed. Based on the facility's actions, Standard 115.41 (b) standard requires a corrective action. The PREA screening assessments were conducted using an objective screening instrument. In accordance with Standard 115.41 (d), the screening instrument considered factors such as: Whether the inmate has a mental, physical, or developmental disability, the physical build of the inmate, the inmate's own perception of vulnerability, any previous incarcerations or whether the inmate has prior convictions for sex offenses against an adult or child and whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming.</p> <p data-bbox="240 757 1489 882">Within a set time not more than 30 days from the inmate's arrival at the facility, Branchville completed timely reassessments for an inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening. The Auditor determined by examination that all reassessment sampled were completed within the required timeframe establish in Standard 115.41 (f) and (g).</p> <p data-bbox="240 913 1449 1008">After being quarantined , inmate interviewed during the audit confirmed that they were screened for risk of being sexually abused by other inmates or sexually abusive toward other inmates by Branchville staff. This standard requires corrective action.</p> <p data-bbox="240 1039 879 1066"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 1097 890 1523" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 02-01-115 (Sexual Abuse Prevention)</li> <li>• Review of inmate screenings</li> <li>• Review of Sexual Violence Assessment Tool (SVAT)</li> <li>• Observations made during the on-site portion of the audit</li> <li>• Auditor interviews with specialized staff</li> <li>• Auditor interview with inmates (random and targeted)</li> <li>• Auditor interview with the PREA Coordinator</li> </ul> <p data-bbox="240 1554 435 1581"><b>Corrective action:</b></p> <p data-bbox="240 1612 1477 1675">The Auditor will monitor SVAT's for the months of June and July to determine compliance with 115.41 (b). All SVAT's will be completed within 72 hours of the inmate's arrival or transfer to Branchville.</p> <p data-bbox="240 1706 1477 1868">Update, in a memorandum dated 6/22/2021, the Warden rescinded a previous directive regarding a 14-day quarantine moratorium for all inmates entering the Branchville facility, due to the Covid-19 pandemic. The moratorium resulted in a 14-day delay of staff conducting risk assessments known as SVAT's during the quarantine period. On 8/6/2021, the Auditor reviewed SVAT's completed in June through July 2021, for compliance with this standard. All SVAT's (16) and reassessment (16) examined were completed in accordance with Standard 115.41. Corrected</p>



115.42	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1477 465">Policy 01-04-101, Adult Offender Classification; 02-01-118, Transgender and Intersex Procedure; Directive: Health Care Services; 2.03A, Reception Screening; Health Care Services and Directive 3.01A, Health Services for Transgender/Intersex Offenders all address how IDOC/Branchville Correctional Facility uses information from the risk screening assessment instrument (SVAT) as required by Standard 115.41 and 115.42, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive and to inform housing, bed, work, education, and program assignments.</p> <p data-bbox="240 499 1485 656">Throughout interviews with intake staff, the Warden, and the PREA Compliance Manager all staff detailed how the SVAT can be utilized by the Branchville to make individual determinations about how to safeguard the safety of each inmate at Branchville Correctional Facility. As mentioned in 115.41, completion of individual SVAT's were delayed 14 days and therefore requirements in this standard could only be accomplished at the culmination of the quarantine of new arrivals post 14 days.</p> <p data-bbox="240 689 1477 1014">Policy 02-01-118, Transgender and Intersex Procedure, indicates that IDOC considers whether to assign a transgender or intersex inmate to a facility for male or female inmates on a case-by-case basis. IDOC would consider whether the placement of an inmate would ensure the inmate's health and safety, and whether a placement would present management or security problems. The Auditor interviewed one (1) transgender inmate. The same inmate corresponded with the Auditor prior to her arrival. The letter was non-specific, but the inmate simply requested a meeting with the Auditor. During her interview, the transgender inmate confirmed a sense of sexual safety and voiced no concerns regarding the ability to shower at a scheduled time, dress and use the toilet with a measure of privacy. She denied ever being naked in full view of Branchville staff of the opposite gender when using the toilet, showering, or changing clothes. separately from other inmates The transgender, she did requested permission to utilize a bathroom designated for staff. Due to security concerns this request was denied.</p> <p data-bbox="240 1048 1477 1137">Furthermore, the PREA Coordinator detailed that upon receiving notification that an offender has been determined to be transgender or diagnosed as intersex, he would notify the PREA Compliance Manager, and the inmate would be placed on the facility's tracking mechanism for LGBTI offenders.</p> <p data-bbox="240 1171 1485 1395">The PREA Compliance Manager confirmed that in her role it was her responsibility to confirm that an initial placement and programming assessment with subsequent reassessments are conducted every six (6) months in accordance with Section XI of Policy and Administrative Procedure 02-01-115, Sexual Abuse Prevention. Problematic, the Auditor found no evidence that placement and programming assignments for each transgender or intersex inmate were reassessed at least twice each year to review any threats to safety experienced by the inmate, Standard 115.42 (d) and (e) require corrective action. The Auditor found evidence of the completion of a Transgender/Intersex Bi-annual Review completed on 3/31/2021, the inmate arrived on 7/11/2019.</p> <p data-bbox="240 1429 1485 1585">More, the PREA Compliance Manager indicated that each transgender or intersex inmate's own views with respect to his or her own safety would be given serious consideration when making facility and housing placement decisions and programming assignments. The Warden confirmed that Branchville Correctional Facility does not have a dedicated unit, or wing solely for the placement of LGBTI or inmates pursuant to a consent decree, legal settlement, or legal judgement. During the tour of the facility, those identified as high risk of victimization were not assigned to segregated housing.</p> <p data-bbox="240 1619 1485 1686">As a last resort, to protect an inmate who has been victimized when less restrictive measures are inadequate and alternative means of keeping the inmate safe cannot be immediately arranged, isolation may be considered as an option.</p> <p data-bbox="240 1720 879 1742"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 1776 1206 2145" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 01-04-101 (Adult Offender Classification)</li> <li>• 02-01-115 (Sexual Abuse Prevention)</li> <li>• Policy 02-01-118 (Transgender and Intersex Procedure)</li> <li>• Directive: Health Care Services, 2.03A (Reception Screening)</li> <li>• Health Care Services Directive 3.01A (Health Services for Transgender/Intersex Offenders)</li> <li>• Form: State Form 45999 (Offender Health Form)</li> </ul>

- Review of Sexual Violence Assessment Tool (SVAT) documentation
- Interview with the PREA Coordinator and PREA Compliance Manager
- Interviews with staff (random and specialized)
- Interviews with inmates (random and targeted)
- Auditor observations
- Review of facility schematics

**Corrective action:**

The Auditor will monitor SVAT's for the month of July to determine compliance with 115.41 (b) and 115.42 in all material ways. All SVAT's will be completed within 72 hours of the inmate's arrive to the facility.

Problematic, the Auditor found no evidence that placement and programming assignments for each transgender or intersex inmate were reassessed at least twice each year to review any threats to safety experienced by the inmate, Standard 115.42 (d) and (e) require corrective action. Where applicable, Branchville will complete reassessments on all transgender inmates based on arrival dates. Branchville will provide the Auditor with documented evidence of compliance with Standard 115.42 (d) and (e).

<b>115.43</b>	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="242 210 451 235"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1469 362">Policy 02-11-115 Sexual Abuse Prevention prohibits the placement of inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made and there is no available means of separation from likely abusers.</p> <p data-bbox="242 398 1465 589">When applicable, 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. 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 was zero. In the past 12 months, the number of inmates at risk of sexual victimization who were assigned to involuntary segregated housing for longer than 30 days while awaiting alternative placement was zero.</p> <p data-bbox="242 624 1485 815">The Warden indicated during his interview that If an involuntary segregated housing assignment decision 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. To the extent possible, in accordance with 115.43 (b) inmates placed in restrictive housing resulting from a PREA related incident and they are at high risk of sexual victimization would have access to: Program, privileges, medical and mental health services with extremely limited work opportunities. Branchville Correctional Facility met the requirements of Standard 115.43.</p> <p data-bbox="242 848 879 873"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="242 907 759 1330" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 02-11-115 (Sexual Abuse Prevention)</li> <li>• Interview with the PREA Compliance Manager</li> <li>• Interview with the PREA Coordinator</li> <li>• Interview with the Warden</li> <li>• Review of investigations</li> <li>• Facility tour</li> <li>• Interviews with (random and targeted) inmates</li> </ul>

<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 453 235"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1442 362">Policy 02-01-115, Sexual Abuse Prevention, allows for multiple internal ways for inmates to report privately to agency officials about: sexual abuse and sexual harassment; retaliation by other inmates or staff for reporting sexual abuse and sexual harassment; AND staff neglect or violation of responsibilities that may have contributed to such incidents.</p> <p data-bbox="240 396 1437 456">Policy 02-01-115, Sexual Abuse Prevention, mandates that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties. Staff are required to document verbal reports.</p> <p data-bbox="240 488 1485 647">The agency has established procedures for staff to privately report sexual abuse and sexual harassment of inmates using email, face-to-face contact with a supervisor, in writing, or calling the toll-free PREA tip line. During new staff orientation and annual PREA training staff are informed of multiple ways to report sexual abuse, sexual harassment, or retaliation for assisting in an investigation. Staff, family, and friends can find additional PREA reporting information on the agency website IN.gov</p> <p data-bbox="240 678 1493 938">Each staff interviewed during the audit confirmed that they understood their duty to report all allegations of sexual abuse or sexual harassment. Further, the agency provides multiple internal ways for inmates to privately make a PREA report such as: Through the grievance process, telling staff, Ombudsman Bureau and the PREA hotline. Each inmate interviewed during the audit was able to discuss multiple ways of reporting sexual abuse and sexual harassment such as filing a grievance, third-party reporting, PREA hotline or telling a trusted staff person. Most (92%) inmates sampled indicated that they would simply inform staff. Inmates (random and targeted) were also knowledgeable of the grievance process. Grievance forms were observed available in the grievance boxes throughout the facility during the facility tour. Branchville Correctional Facility met the requirement of Standard 115.51.</p> <p data-bbox="240 969 879 994"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 1025 847 1509" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 02-01-115 (Sexual Abuse Prevention)</li> <li>• Auditor review of forms and reporting documentation</li> <li>• Inmate grievance report of allegation</li> <li>• Interviews with inmates (random and targeted)</li> <li>• Interviews with staff</li> <li>• Interview with the PREA Coordinator</li> <li>• PREA Brochures</li> <li>• Inmate handbook</li> </ul>

115.52	<b>Exhaustion of administrative remedies</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 1481 432">Agency policy or procedure allows an inmate to submit a grievance regarding an allegation of sexual abuse at any time, regardless of when the incident is alleged to have occurred. The agency's policy and procedure allow an inmate to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. Policy 00-02-301 Inmate Grievance Process and Policy 02-01-115 Sexual Abuse Prevention and collectively address the requirements of Standard 115.52. The IDOC is not exempt from this standard.</p> <p data-bbox="240 463 1402 524">Policy 00-02-301 Inmate Grievance Process and Policy 02-01-115 Sexual Abuse Prevention collectively address the requirements of Standard 115.52. IDOC is not exempt from this standard.</p> <p data-bbox="240 555 1042 582">Policy 00-02-301, Inmate Grievance Process, Section I, Policy Statement reads:</p> <p data-bbox="240 613 1485 674">It is expected that offender complaints will be resolved informally by staff attempting to meet and discuss the complaints prior to the offender filing a written grievance.</p> <p data-bbox="240 705 1281 732">Policy 00-02-301, Inmate Grievance Process, Section IV, Use of the Offender Grievance Process reads:</p> <p data-bbox="240 763 1477 853">The Department recognizes only one grievance process. The grievance process described in this policy and administrative procedure is the only administrative remedy officially recognized by the Department for the resolution of offenders' grievable issues. The complete offender grievance process consists of the following steps:</p> <ol data-bbox="240 884 1350 1025" style="list-style-type: none"> <li data-bbox="240 884 1350 911">1. A formal attempt to solve a problem or concern following unsuccessful attempts at informal resolutions;</li> <li data-bbox="240 943 783 969">2. A written appeal to the Warden/designee; and,</li> <li data-bbox="240 1001 877 1028">3. A written appeal to the Department Grievance Manager.</li> </ol> <p data-bbox="240 1059 783 1086">Matters Appropriate to the Inmate Grievance Process:</p> <p data-bbox="240 1117 1254 1144">Examples of issues which an inmate may initiate the grievance process include, but are not limited to:</p> <ol data-bbox="240 1176 1453 1550" style="list-style-type: none"> <li data-bbox="240 1176 1453 1236">1. The substance and requirements of policies, procedures, and rules of the Department or facility (including, but not limited to, correspondence, staff treatment, medical or mental health, some visitation, and food service).</li> <li data-bbox="240 1267 1430 1294">2. The way staff members interpret and apply the policies, procedures, or rules of the Department or of the facility.</li> <li data-bbox="240 1326 839 1352">3. Actions of individual staff, contractors, or volunteers.</li> <li data-bbox="240 1384 876 1411">4. Acts of reprisal for using the Inmate Grievance Process.</li> <li data-bbox="240 1442 1453 1503">5. Any other concerns relating to conditions of care or supervision within the Department or its contractors, except as noted in this policy and administrative procedure; and,</li> <li data-bbox="316 1534 456 1561">6. PREA</li> </ol> <p data-bbox="240 1581 1037 1608">Policy 00-02-301, Inmate Grievance Process, Section C. Emergency Grievance</p> <p data-bbox="240 1639 1485 1798">The Auditor interviewed the Warden during the onsite portion of this audit. The Warden detailed the emergency grievance process. The Offender Grievance Specialist would immediately bring an emergency grievance to the attention of the Warden/designee, PREA Compliance Manager and the PREA Coordinator for review and response within one (1) business day of the offender filing the grievance. The action on any emergency grievance may be appealed by the offender within one (1) business day of receiving the response. The Offender Grievance Specialist will notify, via email, the</p> <p data-bbox="240 1830 1485 1989">Department Offender Grievance Manager, PREA Coordinator that the appeal has been submitted. The Department Offender Grievance Manager then issues a final Department decision within five (5) business days of the offender filing the grievance. Problematic, after receiving an emergency grievance the agency is required to issue a final agency decision within five (5) calendar days. Standard 115.52 (f), after receiving an emergency grievance requires the agency to issue a final agency decision within 5 calendar days not business days.</p> <p data-bbox="240 2020 1469 2110">Policy 00-02-301, Inmate Grievance Process, PREA Grievances, Section D. Standard 115.52 (b) requires the agency to 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.</p>

Policy 00-02-301, Inmate Grievance Process, PREA Grievances, Section D. of the grievance process removes standard time limits for submission of a grievance and permits inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits. However, Policy 00-02-301, Inmate Grievance Process, Policy Statement excerpt stipulates:

"...it is expected that offender complaints will be resolved informally by staff attempting to meet and discuss the complaints prior to the offender filing a written grievance."

This segment of the grievance process conflicts with direction provided to staff found in other sections of the same policy. Inmate Grievance Process, Section D., PREA Grievances, paragraph one (1) indicates that the Warden shall forward the emergency grievance to the Offender Grievance Specialist, who shall provide an initial response within forty-eight (48) hours of the offender filing the emergency grievance. This information conflicts with verbiage found in, Inmate Grievance Process, Section C., Emergency Grievance.

The PREA Coordinator confirmed during her interview that the agency would 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. The interview with the PREA Coordinator is consistent with Policy 00-02-301, Inmate Grievance Process, Section D. and Standard 115.52. Furthermore, the PREA Coordinator indicated that if the agency claims the maximum allowable extension of time to respond per

115.52(d)(3), the agency would notify the inmate in writing of any such extension and provide a date by which a decision will be made. The PREA Coordinator confirmed his understanding that if an inmate does not receive a response within the time allotted for reply by the agency, including any properly noticed extension, the absence of a response is considered a denial at that level. The number of emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months was zero.

Policy 00-02-301 Inmate Grievance Process and Policy 02-01-115 Sexual Abuse Prevention and collectively outline the agency's policy and procedure that permits third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of inmates. Specifically, IDOC, Policy 00-02-301 Inmate Grievance Process, Subsection D. reads:

"Third parties, including other offenders, staff members, family members, attorneys, and outside advocates, shall be permitted to assist offenders in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of offenders. If a third-party file such a request on behalf of an offender, the facility may require, as a condition of processing the request, that the alleged victim agree to have the request filed on his/her behalf and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process. If the offender declines to have the request processed on his/her behalf, the Department shall document the offender's decision." More, if an inmate declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the inmate's decision to decline. The number of grievances alleging sexual abuse filed by inmates in the past 12 months in which the inmate declined third-party assistance, containing documentation of the inmate's decision to decline was zero.

The PCM indicated that Branchville 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. The facility investigator confirmed during his interview that IDOC may claim an extension of time to respond, of up to seventy (70) days if the normal time for response is insufficient to make an appropriate decision. The IDOC shall notify the inmate in writing of any such extension and provide a date by which a decision shall be made.

The agency disciplines an inmate for filing a grievance related to alleged sexual abuse, ONLY where the agency demonstrates that the inmates filed the grievance in bad faith outlined in Policy 02-11-115 and 00-02-301. The agency disciplines inmates for filing a grievance related to alleged sexual abuse, ONLY where the agency demonstrates that the inmate filed the grievance in bad faith outlined in Policy 00-02-301.

In the past 12 months, the number of grievances filed that alleged sexual abuse was zero. In the past 12 months, the number of grievances alleging sexual abuse that reached final decision within 90 days after being filed was zero. In the past 12 months, the number of grievances alleging sexual abuse that involved extensions because final decision was not reached within 90 days was zero. The PREA Compliance Manager confirmed during her interview that Branchville would notify an inmate in writing when the agency files for an extension, including notice of the date by which a decision will be made.

The PREA Compliance Manager also provided memos confirming within the last twelve months the facility had zero (0) inmate grievances was filed that alleged sexual abuse and zero (0) inmates were disciplined for filling a baseless claim. Branchville Correctional Facility met the requirement of Standard 115.52.

**Evidence relied upon to make Auditor determination:**

- Pre-Audit Questionnaire
- Policy 00-02-301, Inmate Grievance
- Policy 02-1-115, Sexual Abuse Prevention
- Policy 02-040-101 Administrative Disciplinary Policy
- Interviews with staff (specialized and random)
- Interviews with inmates (random and targeted)
- Interview with the PREA Compliance Manager
- Inmate Handbook and PREA Brochure (English/Spanish)
- Interview with the PREA Coordinator

<b>115.53</b>	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="229 192 1509 255"><b>Auditor Discussion</b></p> <p data-bbox="229 255 1509 434">The facility provides inmates with access to outside victim advocates for emotional support services related to sexual abuse. The contact information is posted throughout the facility. These posters were observed posted during the tour of the facility. The facility maintains copies of the agreement with the Indiana Coalition Against Domestic Violence. A call was made to verify that the Memorandum of Understanding with Indiana Coalition Against Domestic Violence was still in place. Branchville Correctional Facility met the requirement of Standard 115.53.</p> <p data-bbox="229 434 1509 479"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="229 479 1509 963" style="list-style-type: none"> <li data-bbox="229 479 1509 524">• Pre-Audit Questionnaire</li> <li data-bbox="229 524 1509 568">• Policy 02-11-115 (Sexual Abuse Prevention)</li> <li data-bbox="229 568 1509 613">• Observations of the Auditor made during the facility tour</li> <li data-bbox="229 613 1509 658">• Memorandum of Understanding with Indiana Coalition Against Domestic Violence</li> <li data-bbox="229 658 1509 703">• Interviews with inmates (random and targeted)</li> <li data-bbox="229 703 1509 748">• Interviews with staff</li> <li data-bbox="229 748 1509 792">• Interview with the PREA Coordinator</li> <li data-bbox="229 792 1509 837">• Interview with the PREA Compliance Manager</li> </ul>



115.54	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="229 192 1509 255"><b>Auditor Discussion</b></p> <p data-bbox="229 255 1509 434">The facility accepts all third-party reports of inmate sexual abuse or sexual harassment but failed to upload a policy. The agency established a method to receive third-party reports of sexual abuse and sexual harassment that can be found on the agency's website. The agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate on their website. The website provides contact information as well as whom the third-party reporter will speak to when communicating with the agency.</p> <p data-bbox="229 434 1509 479"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="229 479 1509 963" style="list-style-type: none"> <li data-bbox="229 479 1509 524">• Pre-Audit Questionnaire</li> <li data-bbox="229 524 1509 568">• Policy 02-11-115 (Sexual Abuse Prevention)</li> <li data-bbox="229 568 1509 613">• Internet: Indiana Department of Correction website screenshot</li> <li data-bbox="229 613 1509 658">• Interviews with staff (random and specialized)</li> <li data-bbox="229 658 1509 703">• Interviews with inmates (random and targeted)</li> <li data-bbox="229 703 1509 748">• Interview with the PREA Coordinator</li> <li data-bbox="229 748 1509 792">• Visitors PREA Brochure</li> <li data-bbox="229 792 1509 837">• Staff PREA Brochure</li> </ul>

115.61	<b>Staff and agency reporting duties</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 1493 432">Branchville has zero inmates under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute. The agency requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. Further, all medical and mental health practitioners are required to report sexual abuse and to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services.</p> <p data-bbox="240 463 1493 622">Specialized interviews with medical and mental health practitioners confirmed a mandated duty to report PREA related incidents, knowledge, suspicions, or information. Moreover, all Indiana Department of Correction staff are mandated reporters and are required by Policy 02-01-115, Sexual Abuse Prevention to immediately report any knowledge, suspicion, or information they receive regarding sexual abuse and harassment, retaliation against inmates or staff who report any incidents, and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</p> <p data-bbox="240 654 1469 781">The agency requires all staff to report immediately and according to agency policy any retaliation against inmates or staff who reported such an incident. The agency requires all staff to report immediately and according to agency policy any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Interviews with staff (random and specialized) supported full compliance with this standard.</p> <p data-bbox="240 813 1449 940">Aside from reporting to designated shift supervisor or correctional management officials and designated state or local services agencies, IDOC Policy 02-01-115, Sexual Abuse Prevention policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions. Branchville Correctional Facility met the requirements of Standard 115.61.</p> <p data-bbox="240 972 879 999"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 1025 759 1400" style="list-style-type: none"> <li data-bbox="240 1025 536 1052">• Pre-Audit Questionnaire</li> <li data-bbox="240 1084 730 1111">• Policy 02-01-115, Sexual Abuse Prevention</li> <li data-bbox="240 1142 751 1169">• Interviews with staff (random and specialized)</li> <li data-bbox="240 1200 759 1227">• Interviews with inmates (random and targeted)</li> <li data-bbox="240 1258 663 1285">• Interview with the PREA Coordinator</li> <li data-bbox="240 1317 555 1344">• Interview with the Warden</li> <li data-bbox="240 1375 560 1402">• Review of investigative file</li> </ul>

115.62	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 208 453 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1433 398">Policy 02-01-115, Sexual Abuse Prevention requires staff to take immediate action to protect an inmate when he/she is identified as being subject to substantial risk of imminent sexual abuse. 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 was zero. Branchville Correctional Facility met the requirements of Standard 115.62.</p> <p data-bbox="240 432 879 461"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 488 759 857" style="list-style-type: none"> <li data-bbox="240 488 539 517">• Pre-Audit Questionnaire</li> <li data-bbox="240 544 732 573">• Policy 02-01-115, Sexual Abuse Prevention</li> <li data-bbox="240 600 751 629">• Interviews with staff (random and specialized)</li> <li data-bbox="240 656 663 685">• Interview with the PREA Coordinator</li> <li data-bbox="240 712 759 741">• Interview with the PREA Compliance Manager</li> <li data-bbox="240 768 660 797">• Interview with the Executive Director</li> <li data-bbox="240 824 557 853">• Interview with the Warden</li> </ul>

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 453 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1490 533">The agency has a policy requiring that, upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. Policy 02-01-115 supports compliance with this standard. Policy requires: when a Warden/Superintendent or designee receives an allegation that an offender was sexually abused at another facility, the Warden/Superintendent or designee receiving the allegation shall notify the head of the facility where the alleged abuse occurred within seventy-two (72) hours of receiving the allegation and document he/she has provided such information. The Warden/Superintendent that receives such notification shall ensure that the allegation is investigated in accordance with this policy and administrative procedure.</p> <p data-bbox="240 562 1461 757">During the past 12 months, there was one (1) allegation received that an inmate was abused while confined to another facility. Branchville documented the notification of the RDC Warden within 72 hours of receiving the allegation from an inmate. Likewise, The Warden confirmed during his interview that the agency requires that allegations received from other facilities and agencies are investigated in accordance with the PREA standards. In the past 12 months, the number of allegations of sexual abuse the facility received from other facilities was zero. Branchville Correctional Facility met the requirements of Standard 115.63.</p> <p data-bbox="240 786 879 813"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 842 1031 1160" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 02-01-115 (Sexual Abuse Prevention)</li> <li>• Interview with the PREA Compliance Manager</li> <li>• Memorandum: Warden documented notification dated September 3, 2020</li> <li>• Interview with the Warden</li> <li>• Interview with the PREA Coordinator</li> </ul>

115.64	<b>Staff first responder duties</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1490 465">The agency has a first responder policy for allegations of sexual abuse. Policy 02-01-115, Sexual Abuse Prevention requires staff to take specific steps to respond to a report of sexual abuse including; separating the alleged victim from the abuser; preserving any crime scene within a period of time that still allows for the collection of physical evidence; request the alleged victim not take any action that could destroy physical evidence; and ensure that the alleged abuser does not take any action to destroy physical evidence, if the abuse took place within a time period that still allows for the collection of physical evidence.</p> <p data-bbox="242 497 1490 891">In the past 12 months, the number of allegations that an inmate was sexually abused was zero. 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 was zero. 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 steps could be taken to collect any evidence was zero. 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 was zero. 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 was zero.</p> <p data-bbox="242 922 1458 1016">Staff (random and specialized) interviews detailed a clear understanding of the actions to be taken upon learning that an inmate was sexually abused. During her interview, the PREA Compliance Manager confirmed all information contained in the PAQ regarding Standard 115.64.Branchville Correctional Facility met the requirements of Standard 115.64.</p> <p data-bbox="242 1048 879 1077"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="242 1108 770 1473" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Interviews with staff (random and specialized)</li> <li>• Policy 02-01-115 (Sexual Abuse Prevention)</li> <li>• Interview with the PREA Compliance Manager</li> <li>• Interview with an investigator</li> <li>• Interview with the Warden</li> <li>• First Responders Evidence Protocol</li> </ul>

<b>115.65</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 271 1485 499">The facility has developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership. Policy 02-01-115 (Sexual Abuse Prevention) outlines the written plan that coordinates actions to be taken in response to an incident of sexual assault among staff first responders, medical and mental health care practitioners, and facility leadership. The plan was reviewed and follows this standard. Interviews with the Warden and other staff revealed that they are knowledgeable of their duties in response to an allegation of sexual abuse and in keeping with the facility's coordinated response plan. Branchville Correctional Facility met the requirements of Standard 115.65.</p> <p data-bbox="244 533 879 560"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="244 589 847 898" style="list-style-type: none"> <li data-bbox="244 589 536 616">• Pre-Audit Questionnaire</li> <li data-bbox="244 645 740 672">• Policy 02-01-115 (Sexual Abuse Prevention)</li> <li data-bbox="244 701 847 728">• Branchville Correctional Facility Coordinated Response</li> <li data-bbox="244 757 751 784">• Interviews with staff (random and specialized)</li> <li data-bbox="244 813 759 840">• Interview with the PREA Compliance Manager</li> <li data-bbox="244 869 663 896">• Interview with the PREA Coordinator</li> </ul>

<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 271 1485 333">Indiana Department of Correction is not a collective bargaining agency; therefore, this standard is not applicable. Branchville Correctional Facility met the requirements of Standard 115.66.</p> <p data-bbox="244 360 879 387"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="244 421 687 562" style="list-style-type: none"> <li data-bbox="244 421 560 448">• Pre-Audit Questionnaire</li> <li data-bbox="244 477 687 504">• Interview with the PREA Coordinator</li> <li data-bbox="244 533 579 560">• Interview with the Warden</li> </ul>

<b>115.67</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 453 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1485 667">The agency has 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. Policy 02-01-115 Sexual Abuse Prevention addresses this standard. Branchville has designated the PREA Compliance Manager as the Retaliation Monitor. The agency has a form termed PREA Retaliation Monitoring, Indiana Department of Corrections, in place to document protection measures provided to inmates or staff in its efforts to protect staff and inmates. The monitoring take place for a period of at least 90 days and longer, as needed with periodic status welfare checks. There were no incidents of retaliation in the past 12 months documented. During her interview, the PREA Compliance Manager/Retaliation Monitor indicated that in this role she would employ protection measures such as: A transfer, relocation to another living unit or as a last resort restricted housing. More, the PCM also confirmed that emotional support services are available for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. The number of times an incident of retaliation occurred in the past 12 months was zero. Branchville Correctional Facility met the requirements of Standard 115.67.</p> <p data-bbox="240 696 879 723"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 752 954 1010" style="list-style-type: none"> <li data-bbox="240 752 539 779">• Pre-Audit Questionnaire</li> <li data-bbox="240 808 643 835">• PREA Retaliation Monitoring Form</li> <li data-bbox="240 864 954 891">• Interview with the PREA Compliance Manager/Retaliation Monitor</li> <li data-bbox="240 920 555 947">• Interview with the Warden</li> <li data-bbox="240 976 663 1003">• Interview with the PREA Coordinator</li> </ul>



115.68	<p><b>Post-allegation protective custody</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The agency has a policy prohibiting the placement of inmates who allege to have suffered sexual abuse in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been made that there is no available alternative means of separation from likely abusers. Branchville would only restrict an inmate to a room as a last measure to keep an inmate who alleges sexual abuse safe and then only until an alternative means for keeping the inmate safe can be arranged according to the PREA Compliance Manager and Warden.</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 was zero. From a review of case files of inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months, the number of case files that include BOTH (a) a statement of the basis for facility's concern for the inmate's safety, and (b) the reason or reasons why alternative means of separation could not be arranged was zero. The PREA Compliance Manager confirmed data contained in Standard 115.68 as accurate. Branchville Correctional Facility met the requirements of Standard 115.68.</p> <p><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Review of Policy 02-01-115 (Sexual Abuse Prevention)</li> <li>• Policy 02-01-107 (The Use and Operation of Protective Custody)</li> <li>• Interview with the Office of Investigations and Intelligence</li> <li>• Interview with the Warden</li> <li>• Interview with the PREA Compliance Manager</li> <li>• Interview with a supervisor of segregation</li> <li>• Facility tour</li> <li>• Sample: PREA Housing Assignment Review</li> </ul>
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<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 453 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1493 331">The agency/facility has a policy related to criminal and administrative agency investigations. Policy 02-01-115 and 00-01-103 requires criminal investigations to be conducted by the Office of Investigations and Intelligence.</p> <p data-bbox="240 360 1485 591">Substantiated allegations of conduct that appear to be criminal are referred for prosecution. Administrative and criminal investigations were documented, and the appropriate investigation was forwarded to law enforcement. 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 was one 2019 incident. The number of substantiated allegations of conduct that appear to be criminal that were referred for prosecution since 2019 was zero. The agency retains all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.</p> <p data-bbox="240 620 1474 712">Policy 00-01-103 Investigations and Intelligence requires all staff to fully cooperate with all investigations. There was (0) substantiated allegation of sexual abuse during this reporting period. Branchville Correctional Facility met the requirements of Standard 115.71.</p> <p data-bbox="240 741 879 770"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 799 788 1057" style="list-style-type: none"> <li data-bbox="240 799 549 828">• Pre-Audit Questionnaire</li> <li data-bbox="240 857 740 887">• Policy 02-01-115 (Sexual Abuse Prevention)</li> <li data-bbox="240 916 788 945">• Policy 00-01-103 (Investigations and Intelligence)</li> <li data-bbox="240 974 603 1003">• Interview with the investigators</li> <li data-bbox="240 1032 759 1061">• Interview with the PREA Compliance Manager</li> </ul>

115.72	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="229 192 1509 255"><b>Auditor Discussion</b></p> <p data-bbox="229 255 1509 456">Policy 00-01-103, Investigation and Intelligence demonstrates compliance with Standard 115.72. The policy states the facility shall impose no standard higher than a preponderance of the evidence in determining whether allegations are substantiated in administrative and criminal investigations. During his interview, the investigator confirmed 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. Branchville Correctional Facility met the requirements of Standard 115.72.</p> <p data-bbox="229 456 1509 497"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="229 497 1509 790" style="list-style-type: none"> <li data-bbox="229 497 1509 537">• Pre-Audit Questionnaire</li> <li data-bbox="229 537 1509 577">• Policy 00-01-103 (Investigation and Intelligence)</li> <li data-bbox="229 577 1509 618">• Interview with the PREA Compliance Manager</li> <li data-bbox="229 618 1509 658">• Interview with the investigator</li> </ul>

<b>115.73</b>	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 453 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1485 432">Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency/facility subsequently must inform the inmate (unless the agency has determined that the allegation is unfounded) whenever: The staff member is no longer posted within the inmate's unit; The staff member is no longer employed at the facility; The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.</p> <p data-bbox="240 465 1485 689">Policy 02-01-115 Sexual Abuse Prevention addresses this standard. Policy 02-01-115 Sexual Abuse Prevention requires a facility to provide any inmate who alleges that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency. The standard requires that after an allegation of sexual abuse the inmate shall be informed verbally or in writing as to whether the allegation was substantiated, unsubstantiated or unfounded. All such notifications and attempts at notifications would be documented. In the past 12 months, the number of notifications to inmates that were provided pursuant to this standard was zero. Branchville Correctional Facility met the requirements of Standard 115.73.</p> <p data-bbox="240 723 879 750"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 779 783 1032" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 02-01-115 Sexual Abuse Prevention</li> <li>• Review of investigative file</li> <li>• Interview with the PREA Compliance Manager</li> <li>• PREA inmate notification (where applicable)</li> </ul>

115.76	<b>Disciplinary sanctions for staff</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 1493 533">Branchville staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Policy 04-03-103, Information and Standards of Conduct for Departmental Staff outlines the agency's disciplinary response related to violations of PREA policies by staff. Specifically, disciplinary sanctions for staff may include termination. The policy specifically states that the presumptive disciplinary sanction for staff who engages in sexual abuse will be termination. The failure to participate in an investigation shall also be grounds for terminating employment. In the past 12 months, zero (0) staff were terminated for violating the facility's PREA policies. In the past 12 months, the number of those staff from the facility who have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies was zero.</p> <p data-bbox="240 568 1474 757">During an interview with a Human Resource representative, she confirmed for the Auditor that 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. 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 was zero.</p> <p data-bbox="240 792 1485 913">According to the Warden, any disciplinary sanctions for staff violations of agency policies relating to sexual abuse or sexual harassment (other than engaging in sexual abuse) would be commensurate with the nature and circumstances and scope of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. Branchville Correctional Facility met the requirements of Standard 115.76.</p> <p data-bbox="240 949 879 976"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 1012 1118 1375" style="list-style-type: none"> <li data-bbox="240 1012 560 1039">• Pre-Audit Questionnaire</li> <li data-bbox="240 1066 1118 1093">• Policy 04-03-103 (Information and Standards of Conduct for Departmental Staff)</li> <li data-bbox="240 1120 536 1146">• Staff Discipline Policy</li> <li data-bbox="240 1173 783 1200">• Interview with the PREA Compliance Manager</li> <li data-bbox="240 1227 647 1254">• Interview with HR representative</li> <li data-bbox="240 1281 600 1308">• Review of investigation files</li> <li data-bbox="240 1335 624 1361">• Sexual Abuse Incident Review</li> </ul>

<b>115.77</b>	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 453 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1490 533">The agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies (unless the activity was clearly not criminal) and to relevant licensing bodies. Policy 02-01-115 Sexual Abuse Prevention states that any contractor or volunteer engaging in sexual abuse of inmates will be subject to referral to local law enforcement. The policy further states that the contractor or volunteer would be prohibited from having contact with inmates. In the past 12 months, the number of contractors or volunteers reported to law enforcement for engaging in sexual abuse of inmates was zero. During the past 12 months, zero (0) contractors were reported to law enforcement. Volunteerism has been suspended for better than 18 months. Zero volunteers were prohibited contact with inmates for PREA related reasons. Branchville Correctional Facility met the requirements of Standard 115.77.</p> <p data-bbox="240 562 879 589"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 618 759 819" style="list-style-type: none"> <li data-bbox="240 618 536 645">• Pre-Audit Questionnaire</li> <li data-bbox="240 674 740 701">• Policy 02-01-115 (Sexual Abuse Prevention)</li> <li data-bbox="240 730 560 757">• Review of investigation file</li> <li data-bbox="240 786 759 813">• Interview with the PREA Compliance Manager</li> </ul>

115.78	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1485 365">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. Policy 02-04-101 Disciplinary Code for Adult Offenders address Standard 115.78.</p> <p data-bbox="240 398 1485 622">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, inmates are subject to IDOC disciplinary sanctions pursuant to a formal disciplinary process. According to the Warden the sanctions are 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. In an interview with a medical practitioner, she indicated when determining what types of sanction, if any, should be imposed, the disciplinary process would consider whether an inmate's mental disabilities or mental illness was contributing factor in the behavior of the inmate.</p> <p data-bbox="240 656 1485 880">Policy 02-04-101 Disciplinary Code for Adult Offenders states that sexual contact between persons to include touching of the intimate parts of one person to any part of another whether clothed or unclothed is prohibited and subject to disciplinary sanctions following an administrative finding or a criminal investigation that an inmate engaged in inmate-on-inmate sexual abuse, the sanctions shall be commensurate with the nature and circumstances of the sexual abuse, the inmates disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. Branchville has a work mission. According to medical and mental health practitioners the facility would offer therapy, counseling, or other interventions to an inmate to address sexual victimization or abusive sexual behavior.</p> <p data-bbox="240 913 1485 1003">Inmates requiring extensive intervention could be transferred to other facilities with a mission-driven focus on addressing long-standing sexual trauma or abusiveness. Participation in therapy or counseling is optional. Participation in interventions is never a condition to accessing other programming and or other benefits.</p> <p data-bbox="240 1037 1485 1193">More, the Warden indicated during his interview that if a PREA related incident results in a disciplinary sanction, discipline would be commensurate with the nature, circumstances and scope of the abuse committed, the inmate's disciplinary history especially during the past twelve (12) month period would be a consideration, before imposing comparable sanctions for a comparable offense by an inmate with a similar history. The facility would consider if an inmate's mental disability or mental illness contributed to his behavior.</p> <p data-bbox="240 1227 1485 1317">During this audit period, Branchville reported zero (0) allegations of inmate-on-inmate sexually abusive behavior during this reporting period. During her interview, the PREA Compliance Manager confirmed that Branchville would consult with a mental health practitioner when considering sanctions being imposed on inmates with mental disabilities.</p> <p data-bbox="240 1350 1485 1440">The facility prohibits all sexual activity between inmates and may discipline inmates for such activity. According to the PREA Coordinator and IDOC policy the facility will not deem unauthorized consensual sexual activity to constitute sexual abuse if it determines that the activity was not coerced. Branchville Correctional Facility met the requirements of Standard 115.78.</p> <p data-bbox="240 1473 879 1503"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 1536 1031 2130" style="list-style-type: none"> <li data-bbox="240 1536 560 1565">• Pre-Audit Questionnaire</li> <li data-bbox="240 1592 1031 1621">• Policy 02-04-101 (Administrative Disciplinary Code for Adult Offenders)</li> <li data-bbox="240 1648 603 1677">• Offenses Offender Brochure</li> <li data-bbox="240 1704 783 1733">• Interview with the PREA Compliance Manager</li> <li data-bbox="240 1760 679 1789">• Interview with a medical practitioner</li> <li data-bbox="240 1816 496 1845">• Inmate handbook</li> <li data-bbox="240 1872 560 1901">• Facility tour: Branchville</li> <li data-bbox="240 1928 496 1957">• Inmate handbook</li> <li data-bbox="240 1984 783 2013">• Interview with the PREA Compliance Manager</li> <li data-bbox="240 2040 472 2069">• Conduct report</li> <li data-bbox="240 2096 504 2125">• Consensual report</li> </ul>

115.81	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 453 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1493 566">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. Policy 02-01-115 (Sexual Abuse Prevention) addresses the requirement of Standard 115.81. Inmates who disclose prior sexual victimization or who disclose previously perpetrating sexual abuse during an intake screening will be offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening. In the past 12 months, all inmates who disclosed prior victimization during screening who were offered a follow-up meeting with a medical or mental health practitioner at Branchville. Medical and mental health practitioners confirmed during interviews that staff maintain secondary materials (e.g., form, log) documenting compliance this standard. In the past 12 months, the percent of inmates who have previously perpetrated sexual abuse, as indicated during the screening, who were offered a follow-up meeting with a mental health practitioner was one inmate.</p> <p data-bbox="240 598 1465 689">The facility obtains informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting. The Auditor interviewed targeted inmates who confirmed being advised of the limits to confidentiality by medical and mental health practitioners at the initiation of service.</p> <p data-bbox="240 721 1485 848">Staff (specialized) practitioners interviewed confirmed compliance with this policy. In the past 12 months, the percent of inmates who have previously perpetrated sexual abuse, as indicated during the screening, who were offered a follow up meeting with a mental health practitioner was one. Records examined onsite confirmed that Branchville Correctional Facility met the requirements of Standard 115.81.</p> <p data-bbox="240 880 879 907"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 938 1091 1538" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 02-01-115 (Sexual Abuse Prevention)</li> <li>• Offender information system</li> <li>• Auditor review of behavioral health and intake documentation</li> <li>• Sexual Violence Assessment Tool (SVAT)</li> <li>• Consent for treatment form</li> <li>• Interviews with medical staff (nurse)</li> <li>• Interview with the PREA Compliance Manager</li> <li>• Sample: Staff referral for medical services, history of sexual abusive behavior</li> <li>• Sample: Duty to Report inmate Notification</li> <li>• Interviews with inmates (targeted)</li> </ul>



<b>115.82</b>	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 453 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1490 365">Inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. Policy 2.30A Health Care Services Directive (Sexual Assault) requires timely and unimpeded access to emergency medical treatment, crisis intervention services, sexually transmitted infections prophylaxis and victim advocacy services.</p> <p data-bbox="240 398 1490 456">Each medical or mental health practitioner Interviewed during the audit confirmed that the nature and scope health service and treatment provided to inmates is determined by the health care provider according to his/her professional judgment.</p> <p data-bbox="240 463 1490 557">Custody first responders confirmed during interviews that as a staff first responder they have a duty to immediately notify the appropriate medical and mental health practitioners for assistance. The PREA Compliance Manager confirmed that inmate victims of sexual abuse are afforded a forensic examination at no cost to the victim.</p> <p data-bbox="240 591 1458 685">inmate victims of sexual abuse offered timely information about and timely access to emergency contraception, in accordance with professionally accepted standards of care, where medically appropriate. Branchville Correctional Facility met the requirements of Standard 115.82.</p> <p data-bbox="240 714 879 741"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="240 770 995 1084" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> <li>• Policy 2.30A Health Care Services Directive (Sexual Assault)</li> <li>• IDOC Sexual Assault Manual</li> <li>• Review of an investigation file</li> <li>• Interviews with medical staff ( medical and mental health practitioners)</li> <li>• Interview with the PREA Compliance Manager</li> </ul>

115.83	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="229 192 1509 255"><b>Auditor Discussion</b></p> <p data-bbox="229 255 1509 607">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. Policy 02-02-115 Sexual Abuse Prevention addresses ongoing medical and mental health care for sexual abuse victims and abusers. It also provides for the appropriate tests to be provided. The evaluation and treatment of such victims would 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 upon their release from custody. The policy requires the facility to attempt to obtain a mental health evaluation within 60 days of learning of inmate-on-inmate abusers and offer treatment deemed appropriate by a mental health practitioner. The facility would also such victims with medical and mental health services consistent with the community level of care. The facility medical and mental practitioner confirmed that they would document such actions. Branchville Correctional Facility met the requirements of Standard 115.83.</p> <p data-bbox="229 607 1509 656"><b>Policy, Materials, Interviews and Other Evidence Reviewed:</b></p> <ul data-bbox="229 656 1509 1072" style="list-style-type: none"> <li data-bbox="229 656 1509 705">• Pre-Audit Questionnaire</li> <li data-bbox="229 705 1509 754">• Policy 02-01-115 (Sexual Abuse Prevention)</li> <li data-bbox="229 754 1509 804">• MOU with Deaconess Gateway Hospital</li> <li data-bbox="229 804 1509 853">• IDOC sexual Assault Manual</li> <li data-bbox="229 853 1509 902">• Interviews with medical and mental health staff</li> <li data-bbox="229 902 1509 952">• Interview with the PREA Compliance Manager</li> </ul>

115.86	<b>Sexual abuse incident reviews</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 1469 465">The facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation unless the allegation has been determined to be unfounded. Policy 02-01-115, Sexual Assault Prevention addresses Standard 115.86. The facility PREA Committee is mandated by policy to complete 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. Such review shall ordinarily occur within thirty (30) days of the conclusion of the investigation. The agency requires the facility PREA Committee to:</p> <ol data-bbox="240 501 1469 1034" style="list-style-type: none"> <li>1. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;</li> <li>2. Consider whether the incident or allegation was 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 other group dynamics at the facility;</li> <li>3. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;</li> <li>4. Assess the adequacy of staffing levels in that area during different shifts;</li> <li>5. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff;</li> <li>6. Prepare a report of its findings and any recommendations for improvement and submit the report to the Superintendent and Executive Director of PREA; and,</li> <li>7. The facility shall implement the recommendations for improvement or document its reasons for not doing so.</li> </ol> <p data-bbox="240 1070 1493 1357">The Auditor examined investigative reports, coupled with supplemental documentation from the past 12-months. 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 was zero. During staff interviews the PREA Compliance Manager confirmed her understanding that as PREA Review Committee Chair it was her responsibility to conduct sexual incident reviews of all incidents of sexual abuse within 30 days of the conclusion of a criminal or administrative investigation. In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents was zero. The Branchville Sexual Incident Review Committee includes the PCM, Major, Medical Health Administrator, Investigator, a Mental Health practitioner, shift supervisors and input from line staff where applicable.</p> <p data-bbox="240 1393 1481 1518">According to the PCM and facility Investigator, the Sexual Incident Review team would document all required considerations outlined in this standard. The Auditor also determined that the Sexual Incident Review Team: Considered 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.</p> <p data-bbox="240 1554 1481 1711">More, the PREA Coordinator and the PREA Compliance Manager each confirmed during their respective interviews that the agency requires the PREA Committee to examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse and make recommendations to the Warden. Included in the incident review would be an assessment of the adequacy of staffing levels during the incident and the assessment of whether monitoring technology should be deployed or augmented to supplement supervision by staff.</p> <p data-bbox="240 1747 1485 2002">The Auditor confirmed by examination of a sampled 2019 investigation that Branchville : Prepares a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1) - (d)(5), and any recommendation for improvement is submitted to the Warden. Following the submission of the incident review committee findings, the Warden confirmed during his interview that based on the recommendations he would either implement the recommendations for improvement or documents his reasons for not doing so. During this reporting period Standard 115.86 (e)-1 is not applicable given the facility documented zero incidents of sexual abuse in the past 12 months. Interviews with staff revealed that they understood the purpose of the incident review team and the process. Branchville Correctional Facility met the requirements of Standard 115.86.</p> <p data-bbox="240 2033 810 2060"><b>Evidence relied upon to make Auditor determination:</b></p> <ul data-bbox="240 2092 561 2119" style="list-style-type: none"> <li>• Pre-Audit Questionnaire</li> </ul>

- Review of investigative sexual abuse reports in the past 12-month period (0)
- Interview with Sexual Abuse Incident Review Team members (Investigator/PCM)
- Interview with the PREA Compliance Manager

<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Audited at Agency Level
	<b>Auditor Discussion</b>

<b>115.88</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Audited at Agency Level
	<b>Auditor Discussion</b>

<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Audited at Agency Level
	<b>Auditor Discussion</b>

115.401	<b>Frequency and scope of audits</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 1469 365">During the tour of the facility the upcoming audit notice was found posted throughout the facility. The facility provided time-stamped electronic verification of the posting of the notice. All the agency required facilities were audited during the same time frame to meet the required deadline of one (1) audit within three (3) years.</p> <p data-bbox="240 398 1477 490">Furthermore, the Auditor examined the IDOC 2018, 2019 and 2020 Sexual Assault Prevention Program Annual Reports. The PREA Coordinator during his interview outlined steps taken in 2019 by the agency to enhance and improve compliance with the Prison Rape Elimination Act (PREA) such as:</p> <p data-bbox="240 524 1441 616">Contracted with the Moss Group for a project to improve the IDOC's sexual abuse investigations. The project included a review of current investigations, providing sexual abuse investigations training to agency Investigators and facility PREA Compliance.</p> <p data-bbox="240 649 1461 741">The 2020 Sexual Assault Prevention Program Annual Report indicates a 85% increase in incident reports compared to the previous year, 2019. Substantiated finding fell 36% in the previous two-year period. Consensual sexual behaviors spiked upward by 43%.</p> <p data-bbox="240 775 560 801">2018 – 44 substantiated reports</p> <p data-bbox="240 835 555 862">2019 - 45 substantiated reports</p> <p data-bbox="240 893 544 920">2020 - 29 cases substantiated</p> <p data-bbox="240 954 1409 1068">In 2020, the Indiana Department of Correction continued to make improvements in policy and practice to meet PREA standards. Training was provided to agency investigators tasked with sexual abuse investigations to ensure thorough investigations are being conducted and documented. The agency continues to improve video monitoring technology statewide and conduct job fairs.</p> <p data-bbox="240 1102 1469 1294">Inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel. The Auditor received one letter from an inmate at Branchville. The inmate in question was included in the interview sample of participants. The Auditor was permitted to conduct private interviews with inmates. The Auditor permitted to request and receive copies of any relevant documents (including electronically stored information). The Auditor was provided access to, and the ability to observe, all areas of the audited facility. Branchville Correctional Facility met the requirements of Standard 115.401.</p> <p data-bbox="240 1328 810 1355"><b>Evidence relied upon to make Auditor determination:</b></p> <ul data-bbox="240 1388 727 1697" style="list-style-type: none"> <li data-bbox="240 1388 403 1415">• IDOC website</li> <li data-bbox="240 1449 707 1476">• Interview with staff (random and specialized)</li> <li data-bbox="240 1509 632 1536">• Interview with the PREA Coordinator</li> <li data-bbox="240 1570 715 1597">• Interview with inmates (random and targeted)</li> <li data-bbox="240 1630 523 1657">• Interview with the Warden</li> <li data-bbox="240 1691 727 1718">• Interview with the PREA Compliance Manager</li> </ul>



115.403	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Audited at Agency Level
	<b>Auditor Discussion</b>

<b>Appendix: Provision Findings</b>		
<b>115.11 (a)</b>	<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
<b>115.11 (c)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
<b>115.12 (a)</b>	<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
<b>115.12 (b)</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.)	yes

<b>115.13 (a)</b>	<b>Supervision and monitoring</b>	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
<b>115.13 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes

<b>115.13 (d)</b>	<b>Supervision and monitoring</b>	
	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
<b>115.14 (a)</b>	<b>Youthful inmates</b>	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.14 (b)</b>	<b>Youthful inmates</b>	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.14 (c)</b>	<b>Youthful inmates</b>	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.15 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	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
<b>115.15 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	na
	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 if the facility does not have female inmates.)	na
<b>115.15 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	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 (N/A if the facility does not have female inmates)?	na

<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies 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 have procedures 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
<b>115.15 (e)</b>	<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
<b>115.15 (f)</b>	<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)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all 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?	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 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

<b>115.16 (c)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	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
<b>115.17 (a)</b>	<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
<b>115.17 (b)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether 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.)	yes
<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
<b>115.21 (a)</b>	<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
<b>115.21 (b)</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



<b>115.21 (c)</b>	<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
<b>115.21 (d)</b>	<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? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	na
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
<b>115.21 (e)</b>	<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
<b>115.21 (f)</b>	<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 agency 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.)	na
<b>115.21 (h)</b>	<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 always makes a victim advocate from a rape crisis center available to victims.)	na
<b>115.22 (a)</b>	<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

<b>115.22 (b)</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
<b>115.22 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If a separate entity is responsible for conducting criminal investigations, does the policy 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).)	na
<b>115.31 (a)</b>	<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
<b>115.31 (b)</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

<b>115.31 (c)</b>	<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
<b>115.31 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.32 (a)</b>	<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
<b>115.32 (b)</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 the comprehensive education referenced in 115.33(b)?	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 receive 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
<b>115.34 (b)</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
<b>115.34 (c)</b>	<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

<b>115.35 (a)</b>	<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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	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 or the agency does not employ medical staff.)	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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	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? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	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
<b>115.41 (c)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

<b>115.41 (d)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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
<b>115.41 (e)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as 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, as 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, as known to the agency: history of prior institutional violence or sexual abuse?	yes
<b>115.41 (f)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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

<b>115.41 (g)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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 an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
<b>115.41 (h)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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
<b>115.42 (c)</b>	<b>Use of screening information</b>	
	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

<b>115.42 (d)</b>	<b>Use of screening information</b>	
	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
<b>115.42 (e)</b>	<b>Use of screening information</b>	
	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
<b>115.42 (f)</b>	<b>Use of screening information</b>	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
<b>115.42 (g)</b>	<b>Use of screening information</b>	
	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? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	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? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	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? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
<b>115.43 (a)</b>	<b>Protective Custody</b>	
	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



<b>115.43 (b)</b>	<b>Protective Custody</b>	
	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 any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
<b>115.43 (c)</b>	<b>Protective Custody</b>	
	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
<b>115.43 (d)</b>	<b>Protective Custody</b>	
	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
<b>115.43 (e)</b>	<b>Protective Custody</b>	
	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
<b>115.51 (a)</b>	<b>Inmate reporting</b>	
	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

<b>115.51 (b)</b>	<b>Inmate reporting</b>	
	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? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
<b>115.51 (c)</b>	<b>Inmate reporting</b>	
	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
<b>115.51 (d)</b>	<b>Inmate reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
<b>115.52 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	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
<b>115.52 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	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
<b>115.52 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	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

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

<b>115.53 (a)</b>	<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? (N/A if the facility never has persons detained solely for civil immigration purposes.)	na
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
<b>115.53 (b)</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
<b>115.53 (c)</b>	<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
<b>115.54 (a)</b>	<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
<b>115.61 (a)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
<b>115.61 (b)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes

<b>115.61 (c)</b>	<b>Staff and agency reporting duties</b>	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
<b>115.61 (d)</b>	<b>Staff and agency reporting duties</b>	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
<b>115.62 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
<b>115.63 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.63 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.63 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
<b>115.64 (a)</b>	<b>Staff first responder duties</b>	
	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

<b>115.64 (b)</b>	<b>Staff first responder duties</b>	
	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
<b>115.65 (a)</b>	<b>Coordinated response</b>	
	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

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



<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.)	na
<b>115.73 (c)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (d)</b>	<b>Reporting to inmates</b>	
	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
<b>115.77 (a)</b>	<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
<b>115.77 (b)</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
<b>115.78 (a)</b>	<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
<b>115.78 (b)</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
<b>115.78 (c)</b>	<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>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
<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? (N/A if the facility is not a prison).	yes
<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
<b>115.81 (c)</b>	<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? (N/A if the facility is not a jail).	na
<b>115.81 (d)</b>	<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
<b>115.81 (e)</b>	<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
<b>115.82 (a)</b>	<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
<b>115.82 (b)</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

<b>115.82 (c)</b>	<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
<b>115.82 (d)</b>	<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
<b>115.83 (a)</b>	<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
<b>115.83 (b)</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. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
<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. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
<b>115.83 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.83 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes
<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes

<b>115.86 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.86 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
<b>115.86 (d)</b>	<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
<b>115.86 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	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