

PREA Facility Audit Report: Final

Name of Facility: Indiana Women's Prison

Facility Type: Prison / Jail

Date Interim Report Submitted: 07/23/2021

Date Final Report Submitted: 10/27/2021

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"/>
Auditor Full Name as Signed: `SONYA LOVE	Date of Signature: 10/27/2021

AUDITOR INFORMATION	
Auditor name:	Love, Sonya
Email:	sonya.love57@outlook.com
Start Date of On-Site Audit:	04/12/2021
End Date of On-Site Audit:	04/13/2021

FACILITY INFORMATION	
Facility name:	Indiana Women's Prison
Facility physical address:	2596 N Girls School Rd, Indianapolis, Indiana - 46214
Facility Phone	
Facility mailing address:	

Primary Contact	
Name:	jennifer foley
Email Address:	jefoley@idoc.in.gov
Telephone Number:	3172443387 ext 240

Warden/Jail Administrator/Sheriff/Director	
Name:	Virginia Sampson
Email Address:	VSampson@idoc.in.gov
Telephone Number:	317-244-3387 ext. 39

Facility PREA Compliance Manager	
Name:	Jennifer Foley
Email Address:	jefoley@idoc.in.gov
Telephone Number:	O: 317-244-3387

Facility Health Service Administrator On-site	
Name:	Nikki Webster
Email Address:	Nwebster@idoc.in.gov
Telephone Number:	317-244-3387 ext285

Facility Characteristics	
Designed facility capacity:	727
Current population of facility:	574
Average daily population for the past 12 months:	633
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Females
Age range of population:	19-98
Facility security levels/inmate custody levels:	maximum level 3
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	180
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	46
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	0

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

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

Agency-Wide PREA Coordinator Information			
Name:	Bryan Pearson	Email Address:	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 determine 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). It should be mentioned that errors were identified in this reporting document errors were corrected on 10/27/2021 and the report re-sent to the IDOC to replace the previous report.

To gain compliance a facility was required to meet each standard. To meet each standard. The Auditor relied upon several factors to determine compliance 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.

Pre-audit preparation

The standards used for this audit became effective August 20, 2012. During an internet search the Auditor found and confirmed that IWP was issued a final PREA report on 11/20/2018. Further, in reviewing the Indiana Department of Corrections website the Auditor found the following PREA related information:

PREA Related Information

The Prison Rape Elimination Act (PREA) is a federal law to guide correctional institutions about detecting, preventing, reducing, and punishing sexual abuse/misconduct in confinement settings. IDOC policy confirmed that the agency has a zero-tolerance policy for any sexual behavior, sexual harassment, or sexual misconduct of inmate-on-inmate or staff-on-inmate. Staff includes employee, volunteer, official visitor, or contract staff.

Audit Notice Posting:

During the pre-onsite audit phase, IWP post the required PREA Audit Notice of the upcoming audit six-weeks prior to the on-site visit to allow residents to send confidential communications to the Auditor prior to the onsite visit of April 12-13, 2021. IWP provided the Auditor with a photo verification of the posting. Prior to the onsite audit there were no communications from IWP residents or staff.

Pre-Audit Questionnaire (PAQ):

In preparation for the upcoming audit process, email correspondence occurred with the agency Acting Director/PREA Coordinator. The Pre-Audit Questionnaire was completed by the facility and uploaded to the PREA Resource Center's electronic audit reporting platform. The audit process began with a documentation review using the Pre-Audit Questionnaire (PAQ), an internet.

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.

Location: Indiana Women's Prison (IWP), is located in Indianapolis, Indiana. It is a maximum security facility, which houses security levels such as minimum, medium, and maximum. IWP was the first and is the oldest of all established facilities for adult females in the United States. IWP was originally founded on Randolph Street in 1869, 1.6 miles from downtown Indianapolis. IWP was located on Randolph Street through 2009, until the facility was relocation to the current site at 2596 Girls School Road. The designated facility capacity was 727. The average population for the past 12 months was 633. On the first day of audit the population 426. Inmates interviewed included random and vulnerable inmates such as LGBTIQ and disable.

Buildings/Types

Number of buildings-28

Number of housing units-13

Number of segregation cells-25

Number of open-bay-0

Number of multiple occupancy-12

Medical and mental health services are located onsite. SANE/SAFE forensic services are obtained at a local hospital. Food service and recreation are on-site. Programs include the following: 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.

Leath MCHU

The Last Mile

USDOL Apprenticeship

Prenatal Education

Parenting Education

Vocational Training

Substance Abuse

NA/AA/CA/ALANON

Family Preservation Summer Camp

Children Center Visitation

Thinking for a Change

PLUS

Anger Management

Healing from Domestic Abuse

ICAN

Sheltered Workshop

Community Outreach

IN2Work

Mental Health Program

Oakland City University: Cosmetology, Culinary, Business Technology

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.

Number of standards exceeded:	0
Number of standards met:	41
Number of standards not met:	0
Not audited at the facility level: 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

Five (5) standards require corrective action:

Standard 115.22 requires corrective action

Standard 115.31 requires corrective action

Standard 115.34 requires corrective action

Standard 115.51 requires corrective action

Standard 115.86 requires corrective action

Standards**Auditor Overall Determination Definitions**

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

Auditor Discussion Instructions

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 271 1481 432">The Policy and Administrative Procedure, 02-01-115, Sexual Abuse Prevention address Standard 115.11. Indiana Department of Correction (IDOC) has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment that is outlined in Policy 02-01-115, Sexual Abuse Prevention. The Sexual Abuse Prevention Policy details the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment allegations. The Agency has designated a statewide PREA Coordinator.</p> <p data-bbox="240 465 1458 656">The Agency's Executive PREA Coordinator Director is positioned in the upper level of the agency hierarchy. For the remainder of this report the Executive PREA Coordinator Director will be referred to as the PREA Coordinator. During his interview, the PREA Coordinator confirmed having sufficient time and authority to develop, implement, and oversee the agency efforts to comply with the PREA standards in all its facilities. Further, the PREA Coordinator outlined in detail how Indiana Department of Corrections (IDOC) coupled with PREA Compliance Managers assigned at each facility, advanced the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment.</p> <p data-bbox="240 689 1485 880">In accordance with Standard 115.11b: As confirmed in the Pre-audit Questionnaire (PAQ), the Executive Director, PREA Coordinator is a member of upper-level management in the Indiana Department of Corrections. The Executive Director, PREA Coordinator reports to Executive Director of Investigations and Intelligence. The PREA Executive Director has statewide oversight of twenty-two (22) facility PREA Compliance Managers (PCMs). During his interview, the Executive Director, PREA Coordinator confirmed that he had sufficient time and authority to conduct his responsibilities associated with the development, implementation, and oversight of PREA standards at each of twenty-two facilities.</p> <p data-bbox="240 913 1490 1171">In accordance with Standard 115.11c: The Indiana Women's Prison designated a facility PREA Compliance Manager (PCM). The PREA Compliance Manager is the Correctional Coordinator 3. The position is noted in the facility's organizational chart as a Program Coordinator III and reported to the Administrative Assistant. The PREA Compliance Manager responsibilities include: PREA Compliance Manager, Torture Claim Investigator and Grievance Coordinator. In an interview with the PCM, she confirmed that she had sufficient time and authority to coordinate the facilities efforts to comply with all PREA standards. She detailed her role and responsibilities the PREA Compliance Manager. Furthermore, staff (random and specialized) and inmates (Random and targeted) could identify by sight and name the individual who held the position of PREA Compliance Manager at the Indiana State Prison. Indiana Women's Prison met the requirements of Standard 115.11.</p> <p data-bbox="240 1205 810 1232">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="240 1265 1366 1749" style="list-style-type: none"> <li data-bbox="240 1265 560 1292">• Pre-Audit Questionnaire <li data-bbox="240 1326 762 1352">• Policy 02-01-115 (Sexual Abuse Prevention) <li data-bbox="240 1386 858 1413">• Indiana Women's Prison: PREA Compliance Manager <li data-bbox="240 1447 528 1473">• Organizational Chart <li data-bbox="240 1507 651 1534">• Interview with the facility Warden <li data-bbox="240 1568 890 1594">• Policy 02-04-101 (Disciplinary Code and Adult Offenders) <li data-bbox="240 1628 687 1655">• Interview with the PREA Coordinator <li data-bbox="240 1688 783 1715">• Interview with the PREA Compliance Manager <li data-bbox="240 1749 1366 1776">• Memorandum from the Interim Warden, Appointment of the PREA Compliance Manager dated 3/01/2021.

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	<p data-bbox="229 190 1509 250">Auditor Discussion</p> <p data-bbox="229 250 1509 436">The Agency has 7 contracts. The Agency included the contractual entity's obligation to comply with PREA standards in any new contract or contract renewal signed on or after August 20, 2012. Therefore, all applicable contracts are required to adopt and comply with PREA standards. Moreover, 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 PREA standards. Indiana Women's Facility met the requirements of Standard 115.12.</p> <p data-bbox="229 459 1509 488">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="229 515 1509 963" style="list-style-type: none"> • Pre-Audit Questionnaire • Interview with the PREA Coordinator • Interview with the PREA Compliance Manager • Examined contract: The GEO Group, Inc. • Examined contract: The John P. Craine House, Inc • Examined contract: Volunteers of America of Indiana, Inc. • Examined contract: Lake County Community Corrections • Examined contract: Bartholomew County

115.13	Supervision and monitoring
	<p data-bbox="240 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 273 1493 434">The Policy and Administrative Procedure, 02-01-115, Sexual Abuse Prevention address Standard 115.13. Indiana Department of Correction (IDOC) has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment that is outlined in Policy 02-01-115, Sexual Abuse Prevention. The Sexual Abuse Prevention Policy details the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment allegations. Indiana Women's prison had a documented staffing plan.</p> <p data-bbox="240 465 1493 792">The Auditor interviewed the facility Warden during the onsite portion of the audit. The PREA Compliance Manager provided an updated staffing plan 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. Indiana Women's Prison submitted a staffing plan on December 15, 2020. Indiana Women's Prison in consultation with the Agency PREA Coordinator assessed, determined, and documented whether adjustments were needed on January 22, 2021. The PREA Coordinator during his interview confirmed receipt and review of the Indiana Women's Prison staffing plan. On its face, the facility staffing plan provides for adequate levels of staff to protect inmates against sexual abuse. Considerations of the staffing plan included: Calculating adequate staffing levels, determining the need for additional video monitoring devices, any findings of inadequacy from internal or external oversight bodies, the design of the facility, blind spots, the prevalence of substantiated and unsubstantiated incidents of sexual abuse and any other relevant factors.</p> <p data-bbox="240 824 1493 981">IDOC has implemented a policy of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Unannounced rounds were documented in various locations, the Indiana Women's Prison (IWP), General Housing Daily Logbook and using an electronic form of documentation, the Daily Shift Report submitted in an inter-departmental memo to the Deputy Warden of Operations and the facility Custody Supervisor.</p> <p data-bbox="240 1012 1493 1137">The facility operates 24 hours per day on twelve-hour (12) hour shifts. Random unannounced rounds were selected and reviewed by the Auditor. From the log sheets the Auditor determined that intermediate-level or higher-level supervisors on duty, conducted PREA Unannounced Tours and notated the time of each round. Indiana Women's Prison met the requirements of Standard 115.13.</p> <p data-bbox="240 1169 810 1196">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="240 1227 1133 2114" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115 (Sexual Abuse Prevention) • Indiana Women's Prison Memo – PREA Standard 115.13 c-1 • Indiana Women's Prison Master Shift Roster dated 12/15/2020 • Indiana Women's Prison 18-month Vacancy Rate Report • Indiana Women's Prison Facility Vacancy Report Breakdown • Indiana Women's Prison Organization Chart • Indiana Women's Prison 2020 Facility Staffing Plan Review dated 12/15/2020 • Indiana Women's Prison Average Vacancy Report, dated 1/28/2021 • Auditor review of unannounced rounds, dated November 1, 2020, from H Bracket • Auditor review of unannounced, dated January 11, 2021, from I Bracket • Auditor review of unannounced, dated, January 11, 2021, from K Bracket • Auditor review of unannounced, dated, January 14, 2021, from J Bracket • Interview with the PREA Coordinator • Interview with the PREA Compliance Manager • Interview with staff who conduct unannounced rounds

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Policy and Administrative Procedure, 02-01-115, Sexual Abuse Prevention address Standard 115.14. Indiana Department of Correction (IDOC) has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment that is outlined in Policy 02-01-115, Sexual Abuse Prevention. The Sexual Abuse Prevention Policy details the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment allegations.</p> <p>Indiana Women's Prison does not house Youthful Inmates. Indiana Women's Prison met the requirements of Standard 115.14.</p>

115.15	Limits to cross-gender viewing and searches
	<p data-bbox="240 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 273 1485 465">The Policy and Administrative Procedure, 02-01-115, Sexual Abuse Prevention, Policy 02-10-1118 (Transgender and Intersex Offenders) and 02-03-101, Searches address Standard 115.15. Indiana Department of Correction (IDOC) has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment that is outlined in Policy 02-01-115, Sexual Abuse Prevention. The Sexual Abuse Prevention Policy details the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment allegations. 02-03-101, Searches outlines a systematic mechanism for the searching of inmates, staff and other persons entering the Indiana Department of Corrections facilities.</p> <p data-bbox="240 501 1485 824">Indiana Women's Prison has policies and procedures that enable 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. Indiana Women's Prison requires staff of the opposite gender (male) to announce their presence when entering an inmate housing unit. Random and specialized staff (100%) confirmed that opposite gender staff announce their presence when entering the inmate housing unit (female). The Auditor also interviewed a sample of random and targeted inmates regarding the facility compliance with Standard 115.15 (d). Random and targeted inmates (86 %) confirmed that opposite gender staff made themselves known and made announcements when entering an inmate housing unit of the opposite gender, 8% of inmates sampled indicated that they did not hear any announcement or were not listening, while 6% indicated there were either asleep or working and did not hear any announcements made by opposite gender staff.</p> <p data-bbox="240 860 1485 1115">According to the facility Warden and PREA Compliance Manager, Indiana Women's Prison refrains from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners. Further, the facility always refrains from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances. The Auditor interviewed random and targeted inmates during the onsite portion of this audit review. All inmates (random and targeted) denied being subjected to a cross-gender pat-down search by an opposite gender (male) custody staff. Interviews with random and specialized staff sampled during the on-site portion of this audit confirmed that cross-gender pat-down searches by opposite gender custody staff must be documented and should only take place in exigent circumstances.</p> <p data-bbox="240 1151 1485 1339">Random custody staff (100%) interviewed at Indiana Women's Prison confirmed their understanding that they should always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status. Likewise, each random custody staff interviewed also confirmed that if an inmate's genital status is unknown the facility can determine an inmate's 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.</p> <p data-bbox="240 1375 1485 1563">Policy 02-03-101 and 02-1-115 indicate 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="240 1599 1485 1720">Staff training records sampled (18) confirmed that the facility/agency trains custody 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. More, the facility/agency also trains custody 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.</p> <p data-bbox="240 1756 1485 1877">To triangulate compliance with Standard 115.15 (e) the Auditor interviewed random and targeted inmates. The targeted group included a transgender inmate and zero intersex inmates in the sample. Inmates in the targeted group of participants denied being searched or physically examined to ascertain an inmate's genital status. Indiana Women's Prison met the requirements of Standard 115.15.</p> <p data-bbox="240 1912 810 1939">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="240 1975 766 2110" style="list-style-type: none"> <li data-bbox="240 1975 563 2002">• Pre-Audit Questionnaire <li data-bbox="240 2029 766 2056">• Policy 02-01-115 (Sexual Abuse Prevention) <li data-bbox="240 2083 606 2110">• Policy 02-03-101 (Searches)

- Policy 02-10-1118 (Transgender and Intersex Offenders)
- Interview with random and specialized staff
- Interview with random and targeted inmates
- Review of training curriculum
- Review of staff training records (18)
- Interview with the Warden
- Interview with the PREA Compliance Manager

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 210 451 237">Auditor Discussion</p> <p data-bbox="242 271 1481 398">The Policy and Administrative Procedure, 02-01-115, Sexual Abuse Prevention address Standard 115.16. Indiana Department of Correction (IDOC) has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment that is outlined in Policy 02-01-115, Sexual Abuse Prevention. The Sexual Abuse Prevention Policy details the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment allegations.</p> <p data-bbox="242 432 1481 622">Indiana Women's Prison, intake staff and Case Managers sampled during the audit confirmed that PREA education is provided in verbally, by video and written formats. The Auditor determined by examination that 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 of inmates who are limited English proficient (LEP). IDOC/Indiana Women's Prison has an on-going contract with a vendor to provide interpretive assistance to aid inmates in communicating effectively who are limited English proficient.</p> <p data-bbox="242 656 1481 781">More, Indiana Women's Prison has a contractual agreement with an over-the-phone phone interpretive service. The vendor employs interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. The interpretive service provided by the vendor is available 24 hours a day. The Auditor examined the contractual agreement termed Quality Purchase Agreement (QPA).</p> <p data-bbox="242 815 1481 1005">During random staff interviews (100%) of participants sampled 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. While interviews included bi-lingual inmates, all spoke and understood English without the assistance of an interpretive service. Targeted inmates (100%) sampled confirmed receiving PREA education in a format they understood.</p> <p data-bbox="242 1039 1481 1164">In memos from the facility, Indiana Women's Prison confirmed that in the last 12 months they relied on zero (0) inmate interpreters, readers, or other types on inmate assistance involving PREA cases or investigations. During the onsite portion of the audit the Auditor confirmed with the PREA Compliance Manager that statistical data relevant to this standard was unchanged since the development of the PAQ. Indiana Women's Prison met the requirements of Standard 115.16.</p> <p data-bbox="242 1198 810 1225">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="242 1258 1481 2114" style="list-style-type: none"> <li data-bbox="242 1258 555 1285">• Pre-Audit Questionnaire <li data-bbox="242 1319 1481 1373">• Contract (Telephonic and In Person Interpretive Service), translator, Propio LS LLC, Quality Purchase Agreement (QPA) 2021 <li data-bbox="242 1406 756 1433">• Policy 02-01-115 (Sexual Abuse Prevention) <li data-bbox="242 1467 730 1494">• Adult Offender handbook (Spanish 2016) <li data-bbox="242 1527 592 1554">• PREA Adult Female Poster <li data-bbox="242 1588 681 1615">• PREA Adult Female Spanish Poster <li data-bbox="242 1648 935 1675">• Spanish version: Indiana Coalition Against Domestic Violence <li data-bbox="242 1709 927 1736">• English version: Indiana Coalition Against Domestic Violence <li data-bbox="242 1769 1007 1796">• Spanish version: Third-Party Reporting, Indiana Ombudsman Bureau <li data-bbox="242 1830 999 1856">• English version: Third-Party Reporting, Indiana Ombudsman Bureau <li data-bbox="242 1890 868 1917">• Indiana Women's Prison Memo: Access to interpreters <li data-bbox="242 1951 826 1977">• Indiana Women's Prison Memo: Accommodations <li data-bbox="242 2011 956 2038">• Sexual Abuse Report to Ombudsman 2018 Spanish Translation <li data-bbox="242 2072 1062 2098">• Indiana Coalition Against Domestic Violence Information (Spanish version) <li data-bbox="242 2132 979 2159">• Indiana Women's Prison: Instruction of how to access a translator

- Observations of the Auditor during the on-site portion of the audit
- Interview with inmates (random and targeted)
- Interview with (random and specialized) staff
- Interview with the PREA Coordinator as the designated Agency Head

115.17	Hiring and promotion decisions
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 1477 434">The Policy and Administrative Procedure, 02-01-115, Sexual Abuse Prevention, Policy 04-03-102 (Human Resources) and Policy 04-03-103 (Information and Standards of Conduct for Departmental Staff) address Standard 115.17. Indiana Department of Correction (IDOC) has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment that is outlined in Policy 02-01-115, Sexual Abuse Prevention. The Sexual Abuse Prevention Policy details the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment allegations.</p> <p data-bbox="242 463 1469 656">Policy 04-03-102 (Human Resources) and Policy 04-03-103 (Information and Standards of Conduct for Departmental Staff) prohibit 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) IDOC policies require criminal background records checks be conducted at least every five years of current employees and contractors who may have contact with inmates.</p> <p data-bbox="242 687 1465 848">The administrative Human Resource Manager (HRM) representative was interviewed for the agency 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.</p> <p data-bbox="242 880 1469 1041">The PREA Coordinator confirmed during 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 standard in any interviews or written self-evaluations conducted as part of performance reviews of current employee as described in paragraph (a) of this standard. Furthermore, the PREA Coordinator, the administrative HRM and PREA Compliance Manager all acknowledged that IDOC imposes upon employees a continuing affirmative duty to disclose any such misconduct.</p> <p data-bbox="242 1072 1477 1332">The PREA Compliance Manager and HRM representative confirmed that IDOC prohibits the enlistment of services of any contractor/volunteer/staff 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 Compliance Manager confirmed that Indiana Women's Prison hired 41 employees and 4 contractors in the last 12 months who may have contact with inmates who completed criminal background checks. Volunteerism was suspended in early 2020 due to Covid-19 concerns. The Auditor reviewed a sample of 28 criminal background checks, 5 promotions, 1 re-hire and 22 administrative five-year criminal background checks. Likewise, the Auditor also examined 14 contractor (Wexford) verification of criminal background checks during the onsite portion of the audit. Indiana Women's Prison met the requirements of Standard 115.17.</p> <p data-bbox="242 1364 810 1393">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="242 1422 1137 2022" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115, Sexual Abuse Prevention • Policy 04-03-102 (Human Resources) • Policy 04-03-103 (Information and Standards of Conduct for Departmental Staff) • Policy Discipline Statement, IC 35-44-2-4, State Personnel dated August 1, 2012 • Review of applicant questionnaire • Criminal background checks Indiana Women's Prison staff • Interviews with staff (random and specialized) • Interview with the administrative Human Resources representative • Interview with the PREA Coordinator • Interview with the PREA Compliance Manager

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	<p data-bbox="244 210 453 237">Auditor Discussion</p> <p data-bbox="244 271 1465 398">The Indiana Department of Corrections (IDOC) has not acquired any new facility. Since the last PREA audit of this facility the IDOC did substantially expand the existing facility by incorporating the juvenile facility adjacent to the Indiana Women's Prison. In the expansion, the Agency considered the effect of the design, acquisition, expansion, or modification on the Agency's ability to protect inmates from sexual abuse.</p> <p data-bbox="244 432 1465 524">The agency/facility has installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since the last PREA audit to reduce or eliminate blind spots in and around the facility according to the facility Warden. Indiana Women's Prison met the requirements of Standard 115.18.</p> <p data-bbox="244 557 810 584">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="244 611 783 925" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115, Sexual Abuse Prevention • Interview with the Warden • Facility tour/diagram of the facility • Interview with the PREA Coordinator • Interview with the PREA Compliance Manager

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 271 1481 398">The Policy and Administrative Procedure, 02-01-115, Sexual Abuse Prevention, address Standard 115.21. Indiana Department of Correction (IDOC) has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment that is outlined in Policy 02-01-115, Sexual Abuse Prevention. The Sexual Abuse Prevention Policy details the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment allegations.</p> <p data-bbox="240 432 1493 589">IDOC is responsible for investigating allegations of sexual abuse. Indiana Women's Prison is an adult female facility. It should be mentioned that Indiana Women's Prison houses no youthful inmates. The facility is responsible for investigating administrative sexual harassment allegations. IDOC Intelligence and Investigations conducts investigations into sexual abuse allegations for the Agency. When necessary, IWP would notify the Indiana State Police liaison of a sexual assault to request assistance and consult with local prosecutors if there is a potential criminal violation.</p> <p data-bbox="240 622 1481 779">The PREA investigator interviewed during the audit confirmed that IDOC follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecution. The protocol adopted by IDOC, as appropriate, was adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011.</p> <p data-bbox="240 813 1485 969">Indiana Code (IC) 11-10-3-5, Co-payment requirements; outlines 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 the 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 offsite, without financial cost, where evidentiary or medically appropriate.</p> <p data-bbox="240 1003 1481 1160">IDOC and by extension Indiana Women's Prison offers victims of sexual abuse a forensic medical examination at an outside hospital, without financial cost, where evidentiary or medically appropriate. The Auditor determined compliance with Standard 115.21 (c) PREA investigative incident reports of sexual abuse where a SANE examination was performed was zero in the past 12-month period. SANE/SAFE medical examinations if needed would be performed at Ascension St. Vincent, and Eskenazi Health Hospitals.</p> <p data-bbox="240 1193 1473 1350">Inmate victims of sexual abuse that accept the offer of a forensic examination at an outside hospital would be accompanied to the hospital by a qualified trained Sexual Assault Response Team member. IWP maintains a list of Sexual Assault Response Team (SART) members for each shift to provide a consistent, coordinated, competent and compassionate response to sexual assault in a IDOC facility, to serve as victim-centered advocates and make victim needs a priority in an incident of sexual abuse, during a forensic examination and throughout the investigatory process.</p> <p data-bbox="240 1384 1433 1478">Due to the pandemic hospital access was limited. IDOC has a contractual agreement with the Indiana Coalition Against Domestic Violence (ICADV) to provide advocacy services to victims of abuse. The Auditor examined a contractual agreement (E-Contract 22593-A5) between ICADV and IDOC. The scope of services provided by ICADV include to:</p> <ol data-bbox="240 1512 1401 1686" style="list-style-type: none"> 1. Provide the victim a person they can talk to about what happened to them confidentially for crisis intervention. 2. Provide the offender a plan to address the trauma caused by sexual abuse. 3. Provide referrals to services that provide ongoing support during and after release and to provide victim advocacy emotional support, crisis intervention, information, and referrals to inmates assigned to IDOC facilities. <p data-bbox="240 1720 1465 1776">From each living unit any inmate victim of sexual abuse or harassment, may request victim advocacy services from ICADV by:</p> <p data-bbox="240 1809 1485 1865">Calling toll free to the ICADV hotline from the inmate phone system by dialing #66. Inmates are advised from the recording if you get an answering service leave your name, DOC # and facility in the message or writing:</p> <p data-bbox="240 1899 722 1926">Indiana Coalition Against Domestic Violence</p> <p data-bbox="240 1960 542 1986">Attn: IDOC Victim Advocate</p> <p data-bbox="240 2020 699 2047">1915 W. 18th Street, Indianapolis, IN 46202</p> <p data-bbox="240 2080 1485 2159">Random and specialized staff confirmed knowledge of the advocacy contractual agreement for services between IDOC and ICADV. Each inmate was aware by staff during intake where to find additional victim advocacy information on the living units. Specialized staff confirmed that if requested by the victim, Indiana Women's Prison would provide a SART member, victim</p>

advocate, qualified agency staff member, or qualified community-based organization staff member to accompany and support the victim through the forensic medical examination process and investigatory interviews.

Random and targeted inmates interviewed during the audit detailed general information about services provided by a victim advocacy organization for victims of sexual abuse, but they could not provide any specific information for the Auditor. Indiana Women's Prison met the requirements of Standard 115.21.

Evidence relied upon to make Auditor determination:

- Pre-Audit Questionnaire
- Policy 00-01-103, Investigation, and Intelligence
- Policy 04-03-103, Information and Standards of Conduct for Departmental Staff
- Policy 02-01-115, Sexual Abuse Prevention
- Indiana Code (IC) 11-10-3-5,
- Contractual agreement with Indiana Coalition Against Domestic Violence
- First Responders Evidence Protocols Investigation
- Indiana Women's Prison, SART Roster
- Training curriculum: Sexual Assault Response Team
- Training curriculum: Victim Advocacy
- Interview with the PREA Coordinator
- List of medical and mental health employees and copies of certificates of completion of specialized training
- Internet search: Ascension St. Vincent and Eskenazi Health
- Interview with an inmate victim of sexual abuse
- Interviews with staff (random and specialized)
- Interviews with staff (random and specialized)
- Interview with the PREA Compliance Manager

115.22	<p>Policies to ensure referrals of allegations for investigations</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse. The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual harassment. More, Policy 02-01-115 (Sexual Abuse Prevention) is in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an entity with the legal authority to conduct criminal investigations and Policy 00-01-103, Operation of the Office of Investigations, and Intelligence address Standard 115.22. IDOC documents all referrals for investigation. The policy is available and accessible on the IDOC internet website.</p> <p>Policy 00-01-103 indicates that the Operation of the Office of Investigations and Intelligence (I and I) investigates allegations of sexual abuse. IDOC ensures an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. The facility Warden has designated staff to conduct administrative investigations of sexual harassment (non-criminal). IDOC has a practice that documents all such referrals. Some Investigations and Intelligence Investigators have completed advanced training requirements at the Policy Academy and are sworn police with the power to arrest. IDOC has a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation internally to investigators with the legal authority to conduct criminal investigations unless the allegation does not involve potentially criminal behavior.</p> <p>The Auditor interviewed a facility investigator who confirmed that Indiana Women's Prison documents all investigations (18) to include those referred for pursuit of criminal prosecution (1) (staff).IWP met the requirements of Standard 115.22.</p> <p>Evidence relied upon to make Auditor determination:</p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 00-01-103, Investigation, and Intelligence • Policy 04-03-103, Information and Standards of Conduct for Departmental Staff • Policy 02-01-115, Sexual Abuse Prevention • Indiana Code (IC) 11-10-3-5,
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115.31	Employee training
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 1468 362">Policy 02-01-115, Sexual Abuse Prevention and Policy 01-05-101 Staff Development and Training, the PREA Presentation Guide, Training Records and Training Acknowledgement Sheets collectively address the policy requirements of Standard 115.31.</p> <p data-bbox="242 396 1490 488">IDOC has a written acknowledgement that documents on a specific date an employee received training (and understand said training) from the Indiana Department of Correction regarding the Prison Rape Elimination Act (PREA) and Department of Correction Policy 02-01-115, Sexual Abuse Prevention.</p> <p data-bbox="242 519 1485 678">Additionally, the employee is issued a copy of the Department of Correction Brochure, Sexual Assault Prevention, and a copy of specific PREA staff brochures and documents relating to sexual abuse prevention and mandatory reporting of sexual abuse and sexual harassment. IDOC provides staff with a comprehensive education on the Prison Rape Elimination Act (PREA) that is apparent in Indiana Women's Prison staff training transcripts, training curriculum, and specialty specific training.</p> <p data-bbox="242 710 1474 869">The training curriculums provided by IDOC is tailored to the needs and attributes of the inmates in a male prison population. Furthermore, the training curriculum included topics such as: inmates on inmates' right to be free from sexual abuse and sexual harassment, common reactions of sexual abuse and sexual harassment victims, how to avoid inappropriate relationships with inmates, and how to communicate effectively and professionally with inmates, including gay, bisexual, transgender, intersex, or gender nonconforming inmates.</p> <p data-bbox="242 900 1481 1193">Problematic, the Auditor was unable to determine if such training was tailored to inmates at Indiana Women's Prison. A 2021 report of investigation from IWP regarding allegations of staff sexual misconduct against a male custody officer was troubling. During early morning 1 AM, a singular officer entered a female inmate's room to conduct a general search for contraband. The Auditor found no documented evidence of gender-specific training being provided to male officers assigned to a male prison but working overtime in a female prison. It should be mentioned that during the incident review, IWP acknowledged a failure to provide the required training stipulated in this standard. Consequently, the facility restricted male officers assigned to a male prison but working overtime in a female prison to non-contact post assignments, such as the control room or perimeter. To satisfy this standard 115. 31 (b) Indiana Women's Prison requires corrective action (see below).</p> <p data-bbox="242 1225 1485 1352">Random and specialized training files were sampled for compliance with this standard. All training files reflect that staff received the required PREA training at least every two years. Those employees requiring refresher training received training yearly. The training curriculums provided by the facility was reviewed by the Auditor. New employees receive PREA education as part of the onboarding process for new employees. This standard requires corrective action.</p> <p data-bbox="242 1384 812 1413">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="242 1444 1353 1962" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-11-115 (Sexual Abuse Prevention) • PREA 2020 Lesson plan for staff • Indiana Training Plan/On the Job Training Session/Security Skills Evaluations/Learning Plan Transcript/Acknowledgment of Receipt • Auditor review of training files • Auditor review of training brochures • Interviews with staff (random and specialized) • Interview with an investigator • Interview with the PREA Compliance Manager <p data-bbox="242 1993 440 2022">Corrective Action:</p> <p data-bbox="242 2054 1466 2145">Indiana Women's Prison will develop gender-specific training for all employees reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa. Indiana Women's Prison will provide documented evidence that opposite gender staff working at the female prison receives gender-specific specialized training before being</p>

115.32	<p>Volunteer and contractor training</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The Policy and Administrative Procedure, 02-01-115, Sexual Abuse Prevention, address Standard 115.32. Indiana Department of Correction (IDOC) has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment that is outlined in Policy 02-01-115, Sexual Abuse Prevention. The Sexual Abuse Prevention Policy details the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment allegations.</p> <p>Indiana Department of Corrections ensures 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. In 2020, volunteer services were suspended due to the pandemic virus. The facility currently has zero volunteers and 46 contractors.</p> <p>In 2020, volunteerism was suspended out of an abundance of caution for the Corona virus pandemic. Prior to the suspension of volunteer services, all volunteers and contractors who have contact with inmates were trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention and detection. IDOC has developed a training brochure for sexual abuse prevention and reporting targeting: Staff, Contractors and Volunteer information. The PREA brochure contains topics such as: Types of sexual abuse and sexual harassment, methods for reporting sexual abuse and sexual harassment, crisis intervention, treatment of the crime scene, IDOC zero tolerance policy, prevention and how to recognize signs of sexual assault.</p> <p>The PREA training curriculum provides multi-types of training platforms that are determined based on the services provided by the volunteer or contractor and 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. Indiana Women's Prison met the requirements of Standard 115.32.</p> <p>Evidence relied upon to make Auditor determination:</p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire • Indiana Contractor and Volunteer Manual • Sample examination of acknowledgment of receipt of training contractors • Interview with the PREA Compliance Manager • Interview with contractors
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115.33	Inmate education
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 1477 398">The Policy and Administrative Procedure, 02-01-115, Sexual Abuse Prevention, address Standard 115.33. Indiana Department of Correction (IDOC) has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment that is outlined in Policy 02-01-115, Sexual Abuse Prevention. The Sexual Abuse Prevention Policy details the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment allegations.</p> <p data-bbox="242 430 1457 622">According to the intake staff, during the intake process but within 30 days, inmates at the Indiana Women's Prison receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment. Further, intake staff indicated to the Auditor that all 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. By examination of intake documents the Auditor determined that all inmates placed at the Indiana Women's Prison undergo a PREA screening and PREA education upon admission to the facility to include transfers from other facilities.</p> <p data-bbox="242 654 1485 1216">The Auditor interviewed a sample of random and targeted inmates (100%) who confirmed receipt of PREA education during the intake process in the form of a PREA video, female inmate PREA brochure, the inmate handbook, and a face-to-face interview with intake staff. More, all random and targeted inmates sampled confirmed receiving information explaining how to report incidents or suspicions of sexual abuse or sexual harassment. Each inmate interviewed could detail multiple methods to report sexual abuse and sexual harassment such as telling a trusted staff person, informing the Indiana Ombudsman's Bureau, or using the PREA hotline. Inmates sampled were knowledgeable of their rights. Furthermore, all inmates sampled confirmed that their PREA education included information such as: Their right to be free from retaliation for reporting such incidents, the Agency policies, and procedures for responding to a PREA incident, and how to report incidents or suspicions of sexual abuse or sexual harassment. Similarly, PREA education and information is provided for those inmates who are limited English proficient (LEP), deaf, visually impaired, or otherwise disabled. Educational material is provided in two languages, English, and Spanish. All inmates (100%) sampled confirmed that PREA screening material and PREA educational information was delivered in a format they understood. According to the PREA Compliance Manager and the PREA Coordinator, inmates requiring other languages are communicated through a language-line interpretive service contract provided by the Agency. This information was verified through the review of the contractual agreement provided by the PREA Coordinator. The Auditor noted during the facility tour, key PREA information displayed such as: PREA posters, PREA notification numbers, the Indiana Ombudsman Bureau notification information, PREA hotline number, and victim advocacy information in English and Spanish. The Indiana Women's Prison met the requirements of Standard 115.33.</p> <p data-bbox="242 1247 812 1276">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="242 1305 826 1792" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115, Sexual Abuse Prevention • Sample intake forms • Interview with the PREA Compliance Manager • Interview with the PREA Coordinator • Interview with random and targeted inmates • Interview with intake staff • Inmate PREA Education Acknowledgement Form • Inmate Grievance Orientation document

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 210 451 237">Auditor Discussion</p> <p data-bbox="242 271 1485 432">The agency maintains documentation showing that investigators have completed the required training. Policy 02-01-115 (Sexual Abuse Prevention) and Policy 00-01-103 (Office of Investigation and Intelligence) address the IDOC's approach to Standard 115.34. 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:!</p> <ol data-bbox="242 465 1485 1794" style="list-style-type: none"> 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." Indiana Women's Prison 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. Indiana Women's Prison met the requirements of Standard 115.34. <p data-bbox="242 1821 810 1848">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="242 1877 802 2134" style="list-style-type: none"> • 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 a PREA Investigator
- Internet search: National Institution of Corrections, Specialized Investigative Training, PREA: Investigating Sexual Abuse in a Confinement Setting, training curriculum
- Training Curriculum: Moss Group Specialize Training, Certificate of Completion (NIC), Specialized Investigative Training, Ashley Willis, PREA: Coordinator Roles and Responsibilities, dated February 12, 2020
- Training Curriculum: Moss Group Specialize Training, Certificate of Completion (NIC), Specialized Investigative Training, Lorna Harbaugh, 2018
- Training Curriculum: Moss Group Specialize Training, Certificate of Completion (NIC), Specialized Investigative Training, Neil Johnson, 2018
- Certificate of Completion (NIC), Specialized Investigative Training, David Ware, PREA: Investigating Sexual Abuse in a Confinement Setting, Advanced Investigations, dated June 5, 2018
- Certificate of Completion (NIC), Specialized Investigative Training, Nicholas Kennedy, PREA: Investigating Sexual Abuse in a Confinement Setting, Advanced Investigations, dated October 3, 2018
- Certificate of Completion (NIC), Specialized Investigative Training, Nicholas Kennedy, PREA: Investigating Sexual Abuse in a Confinement Setting, dated October 3, 2018
- Certificate of Completion (NIC), Specialized Investigative Training, Robert Evans, PREA: Investigating Sexual Abuse in a Confinement Setting, dated October 29, 2018
- Certificate of Completion (NIC), Specialized Investigative Training, James Smith, PREA: Investigating Sexual Abuse in a Confinement Setting, dated September 13, 2018
- Certificate of Completion (NIC), Specialized Investigative Training, James Smith, PREA: Investigating Sexual Abuse in a Confinement Setting, Advanced Investigations, dated December 10, 2018
- 2020 PREA Investigations Training Participant Manual

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 210 453 237">Auditor Discussion</p> <p data-bbox="242 271 1485 499">Policy 02-11-115 (Sexual Abuse Prevention) addresses the policy requirement for Standard 115.35. The medical staff at Indiana Women’s Prison does not conduct forensic medical exams. IDOC maintains documentation that medical and mental health practitioners have received the required specialized and general PREA training referenced in this standard. A sample of 27 training documents for medical and mental health practitioners was examined for compliance with this standard. The documentation indicates that training was conducted, and that specialized staff are re-trained at least yearly on the Prison Rape Elimination Act, and related IDOC policies and practices. Indiana Women’s Prison met the requirements of Standard 115.35.</p> <p data-bbox="242 530 810 557">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="242 589 1201 898" style="list-style-type: none"> <li data-bbox="242 589 560 616">• Pre-Audit Questionnaire <li data-bbox="242 647 762 674">• Policy 02-11-115 (Sexual Abuse Prevention) <li data-bbox="242 705 1201 732">• Wexford PREA Training for contract medical and mental health staff, PREA Lesson Plan <li data-bbox="242 763 1098 790">• Review of specialized training certifications for medical and mental health staff <li data-bbox="242 822 794 848">• Interviews with Medical and Mental Health Staff <li data-bbox="242 880 687 907">• Interview with the PREA Coordinator

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Policy 02-01-115 Sexual Abuse Prevention and 04-01-101, Adult Offender Classification, address this standard. It is the policy of the IDOC to provide a safe and secure environment for all staff, volunteers, contractual staff, visitors, official visitors, and offenders; and to maintain a program for the prevention of sexual abuse and sexual harassment in any facility operated by the Department or with which the Department contracts.</p> <p>According to the PREA Coordinator, Indiana Women's Prison does not have a consent decree, legal settlement, or legal judgement that requires the facility to establish a dedicated facility, unit, or wing for inmates identified as gay, bisexual, lesbian, transgender, or intersex as provided by title, status, and finds of each decree, settlement, or judgement.</p> <p>IDOC policy mandates that all facilities assess inmates using a screening instrument, Sexual Violence Assessment Tool (SVAT), during intake or during a transfer to another facility, to determine the risk of victimization or abusiveness toward other inmates. The screening process ordinarily should occur within 72 hours of arrival at the facility. Intake staff interviewed during the onsite portion of the audit confirmed that on or before the inmate's arrival IDOC considers the offender's criminogenic history, in addition to institutional alerts, gang affiliation, history of victimization and abusiveness to inform inmate housing, programming and placement decisions. Other factors considered include the inmate's own perception regarding their sexual safety and vulnerability, existing disabilities, SVAT, and disclosures during the face-to-face interview with a case manager or intake staff. PREA educational material is issued to the inmate during the intake process.</p> <p>The Auditor examined the Adult SVAT Questionnaire for objectivity. The instrument considers at a minimum, factors outlined in Standard 115.41 such as: The age of the inmate; physical build; previous incarcerations; the inmates 's perception of vulnerability; and whether the inmates is or is perceived to be gay, bisexual; transgender, intersex or gender nonconforming. An interview with intake staff confirmed that the SVAT is used to inform housing, job, program, education, and housing.</p> <p>Sample participants from the targeted group (15) were composed of inmates who self-identified as lesbian, bisexual, or gay (9), disable (2), reported abuse (2) and reported sexual victimization during screening (2). Each targeted inmate sampled confirmed that during the intake process they were interviewed individually and given the opportunity to voice their concerns regarding their personal perceptions of vulnerability. Similarly, the same sample of participants from the targeted group denied being placed in dedicated units or wings for inmates identified as gay, bisexual, transgender, or intersex.</p> <p>Interviews with random and targeted inmates confirmed that inmates are being screened for risk of victimization or abusiveness on arrival or transfer to the facility. The inmate population totaled 556 inmates on the first day of the onsite audit. The Auditor examined twenty (20) SVATS documenting the arrival of inmates in the past 12-months. Each SVAT was completed within the 72-hour timeframe as required in this standard. Standard 115.41 (f) mandates that within a set time not more than 30 days from the inmate's arrival at IWP, the facility will reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening. From the same sample of twenty (20) SVATS the Auditor determined that all inmates were reassessed within 30 days of their initial arrival by IWP intake staff.</p> <p>Random and targeted inmates interviewed regarding the intake process confirmed that each was interviewed individually and given the opportunity to voice their concerns regarding personal perceptions of vulnerability. All inmates (random and targeted) denied being placed in dedicated units or wings for inmates identified as gay, bisexual, transgender, or intersex. Interviews with specialized practitioners and intake staff confirmed that IWP would not discipline an inmate for refusal to answer, or for not disclosing complete information in response to any or all PREA related questions posed regarding screening for risk of sexual victimization and abusiveness.</p> <p>Staff responsible for completing SVAT's, specialized medical, mental health practitioners, and intake staff all confirmed during individual interviews that IWP has a system in place to guard against the dissemination of sensitive information by staff or other inmates. Sensitive information is password protected with limited access. Indiana Women's Prison met the requirements of Standard 115.41.</p> <p>Evidence relied upon to make Auditor determination:</p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115 (Sexual Abuse Prevention) • Interview of staff responsible for completion of SVAT's • Review of 30-day reassessment

- Review of Sexual Violence Assessment Tool (SVAT)
- Observations made during the on-site portion of the audit
- Interviews with specialized staff
- Interviews with inmates (random and targeted)
- Interview with the PREA Coordinator
- SVAT questionnaire
- SVAT instructions (adult)

115.42	Use of screening information
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 1461 398">Policy 02-01-115 Sexual Abuse Prevention, Policy 02-01-118 Transgender Offenders and 04-01-101, Adult Offender Classification, address this standard. It is the policy of the IDOC to provide a safe and secure environment for all staff, volunteers, contractual staff, visitors, official visitors, and offenders; and to maintain a program for the prevention of sexual abuse and sexual harassment in any facility operated by the Department or with which the Department contracts.</p> <p data-bbox="242 430 1477 589">According to intake staff, the Agency uses 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, work, education, and programming assignments. During an interview with the PREA Coordinator, PREA Compliance Manager and Warden, each confirmed that the Agency makes individualized determinations about how to ensure the safety of each inmate.</p> <p data-bbox="242 620 1473 882">Further, the PREA Coordinator also indicated that when deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, the Agency considers, 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. Placement and programming assignments for a transgender or intersex inmate would be reassessed at least twice each year to review any threats to safety experienced by the inmate, indicated the PREA Compliance Manager. Transgender and intersex inmates may not be assigned to gender-specific facilities based solely on their external anatomy. 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.</p> <p data-bbox="242 913 1469 1041">Indiana Women's Prison does not house LGBTI inmates a dedicated 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 based on such identification or status.</p> <p data-bbox="242 1072 1469 1200">Indiana Women's Prison does not house LGBTI inmates a dedicated 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 based on such identification or status.</p> <p data-bbox="242 1232 1481 1391">Indiana Women's Prison does not house LGBTI inmates a dedicated 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 based on such identification or status. Based on the facility tour and inmate interviews with random and targeted inmates the Auditor determined IWP met the requirement for Standard 115.42.</p> <p data-bbox="242 1422 810 1451">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="242 1482 890 2134" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115 (Sexual Abuse Prevention) • Policy 02-01-118 Transgender Offenders • Policy 04-01-101, Adult Offender Classification • Interview of staff responsible for completion of SVAT's • Review of 30-day reassessment • Review of Sexual Violence Assessment Tool (SVAT) • Observations made during the on-site portion of the audit • Interviews with specialized staff • Interviews with inmates (random and targeted) • Interview with the PREA Coordinator • SVAT questionnaire

- SVAT instructions (adult)
- Transgender/Intersex Placement Review

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 210 451 237">Auditor Discussion</p> <p data-bbox="242 271 1461 398">Policy 02-01-115 Sexual Abuse Prevention, Policy 02-01-118 Transgender Offenders and 04-01-101, Adult Offender Classification, address this standard. It is the policy of the IDOC to provide a safe and secure environment for all staff, volunteers, contractual staff, visitors, official visitors, and offenders; and to maintain a program for the prevention of sexual abuse and sexual harassment in any facility operated by the Department or with which the Department contracts.</p> <p data-bbox="242 432 1477 521">Indiana Women's Prison refrains 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 according to the Warden and PREA Compliance Manager.</p> <p data-bbox="242 528 1418 589">Further, if a facility cannot conduct an assessment immediately, IWP would hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.</p> <p data-bbox="242 622 1493 947">The Auditor interviewed a custody supervisor who supervises segregation. The supervisor indicated to the extent possible, inmates who are placed in segregated housing because they are at high risk of sexual victimization would have at best minimal access to: Programs, privileges, education, or work opportunities. The Warden indicated that the placement of a victim of sexual abuse in segregation because the inmate is at high risk of sexual victimization into involuntary segregated housing would be considered as the last alternative means of separation from the likely abusers, that IWP could arrange, and the placement would not ordinarily exceed a period of 30 days. The facility would document in detail the basis for the facility's concern for the inmate's safety and the reason why no alternative means of separation could be arranged for the victim. Every 30 days, IWP would review the involuntary segregation placement of the victim at high risk of sexual victimization and determine whether there is a continuing need for separation from the general population at the Indiana Women's Prison.</p> <p data-bbox="242 981 1493 1205">The facility tour included a tour of restricted housing. During the audit there were zero inmates placed in involuntary segregation for PREA related reasons or because no alternative means were available to separate a likely abuser from a victim. Likewise, the Auditor interviewed random and targeted inmates, zero indicated being placed in involuntary segregation because no alternative means were available to separate a likely abuser from a victim. The PAQ as confirmed by the PREA Compliance Manager indicates in the past 12 months for 1 to 24 hours, zero inmates were placed in involuntary segregation because they were high risk for sexual victimization. Indiana Women's Prison met the requirement of Standard 115.43.</p> <p data-bbox="242 1238 810 1265">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="242 1294 903 2011" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115 (Sexual Abuse Prevention) • Policy 02-01-118 Transgender Offenders • Policy 04-01-101, Adult Offender Classification • Interview of staff responsible for completion of segregation • PREA Housing Assignment Review document • Observations made during the on-site portion of the audit • Interviews with specialized staff • Interviews with inmates (random and targeted) • Interview with the PREA Coordinator • Interview with the Warden • Interview with the PREA Compliance Manager • Transgender/Intersex Placement Review

115.51	Inmate reporting
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Policy 02-01-115, Sexual Abuse Prevention and Policy 00-01-102, Inmate Access to Court address the requirements of Standard 115.51.</p> <p>The PREA Coordinator and the PREA Compliance Manager each indicated that the facility never houses inmates detained solely for civil immigration purposes according to the PCM. The agency provides multiple internal ways for inmates to privately report to agency officials sexual abuse and sexual harassment: sexual abuse and harassment; retaliation by other inmates or staff for reporting sexual.</p> <p>The same policy, Policy 02-01-115, mandates that staff accept reports of sexual assault and sexual harassment made verbally, in writing, from a third-party or anonymously. Further, the agency also provides inmates with at least one way to report sexual or sexual harassment to a public or private entity or office that is not part of the agency. The private entity or office allows the inmates to remain anonymous if requested.</p> <p>Indiana Women's Prison provides internal ways for inmates to privately report sexual abuse and sexual harassment. The PREA brochure is designed expand and inform readers regarding sexual abuse, ways to report an incident of sexual abuse, threats of sexual abuse or sexual assault. The victim of a sexual assault can report sexual abuse or sexual harassment by:</p> <ul style="list-style-type: none"> • Telling a trusted staff person • Dialing # 80 to report sexual abuse or misconduct • Writing or calling the Indiana Ombudsman Bureau 402 W. Washington, Street., W479 , Indianapolis, IN 46204 • Filing a grievance • Third party reporting having a family member or friend to report an incident on their behalf • Email: idocprea@idoc.in.gov or phone:1 (877) 383-5877 • Alert the PREA Compliance Manager <p>The Auditor tested the telephone system throughout the facility. Random and targeted inmates (100%) confirmed during interviews that the facility provides multiple ways to report sexual abuse or sexual harassment. Moreover, during inmate interviews (random and targeted) inmates were able to detail multiple ways of reporting sexual abuse or sexual harassment to include contacting the PREA Compliance Manager or Ombudsman Bureau. From a review of facility investigations, the Auditor determined that inmates were utilizing the Ombudsman Bureau to make PREA reports, and that the bureau contacted the IDOC PREA Coordinator. The same inmates detailed for the Auditor how to report an incident of sexual abuse or sexual harassment using their personal tablets, the dorm kiosk, by filing a grievance, notifying a family member or friend or using the administrative grievance process.</p> <p>Random and targeted inmates sampled (100%) indicated that they felt comfortable telling a trusted staff member or the PREA Compliance Manager. The Auditor received zero letters from inmates at IWP.</p> <p>All staff (random and specialized) sampled indicated they would accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties, immediately document the event and immediately notify their shift supervisor while maintaining the sexual safety of the victim. Problematic, during a review of investigative report the Auditor found incidents were custody related a sexual abuse or sexual harassment claim to a custody supervisor who refused to take the report and directed the officer to make the report to the custody supervisor who managed the rotation where the allege incident took place to initiate a PREA report. This standard requires a corrective action. After corrective action, Indiana Women's Prison met the requirements for Standard 115.51.</p> <p>Evidence relied upon to make Auditor determination:</p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire • Indiana Ombudsman Bureau • Inmate and Staff PREA Brochure • Agency Inmate Handbook

- PREA related informational posters (English/Spanish)
- Facility tour
- Policy 02-01-115 (Sexual Abuse Prevention)
- Policy 00-01-102 (Inmate Access to Court)
- Review of the investigative reports
- Auditor review of forms and reporting documentation
- Interviews with inmates (random and targeted)
- Interviews with staff (random and specialized)
- Interview with the PREA Compliance Manager
- Interview with the PREA Coordinator
- Examine: IDOC PREA Web page
- PREA Coordinator

Corrective Action:

The PREA Coordinator will retrain all custody supervisor regarding Standard 115.51. The said training of custody supervisor will be documents on a training roster that will include the printed name of each custody manager and the signed acknowledgement of the training. The same training will include the Warden, Deputy Warden's and PREA Compliance Manager. The PREA Coordinator will provide the PREA Auditor with document proof of the training. The Auditor will monitor investigations for a period of at least 25 days to ensure compliance with Standard 115.51. IWP provided the Auditor with document of re-training for custody and maintenance staff.

115.52	Exhaustion of administrative remedies
	<p data-bbox="240 147 740 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 273 1484 398">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. 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. Policy 00-02-301, Inmate Grievance Process, Section I, Policy Statement reads:</p> <p data-bbox="240 434 1484 492">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="240 528 1484 654">Policy 00-02-301, Inmate Grievance Process, Section IV, Use of the Offender Grievance Process reads: 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="240 689 1340 824" style="list-style-type: none"> 1. A formal attempt to solve a problem or concern following unsuccessful attempts at informal resolutions; 2. A written appeal to the Warden/designee; and, 3. A written appeal to the Department Grievance Manager. <p data-bbox="240 860 1420 918">Matters Appropriate to the Inmate Grievance Process: Examples of issues which an inmate may initiate the grievance process include, but are not limited to:</p> <ol data-bbox="240 954 1452 1326" style="list-style-type: none"> 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). 2. The way staff members interpret and apply the policies, procedures, or rules of the Department or of the facility. 3. Actions of individual staff, contractors, or volunteers. 4. Acts of reprisal for using the Inmate Grievance Process. 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, 6. PREA <p data-bbox="240 1361 1037 1388">Policy 00-02-301, Inmate Grievance Process, Section C. Emergency Grievance</p> <p data-bbox="240 1424 1484 1675">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 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.</p> <p data-bbox="240 1688 1452 1747">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 1783 1037 1809">Policy 00-02-301, Inmate Grievance Process, PREA Grievances, Section D.</p> <p data-bbox="240 1845 1484 1904">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> <p data-bbox="240 1939 1484 2020">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:</p> <p data-bbox="240 2056 1484 2114">"...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 2128 1452 2154">This segment of the grievance process conflicts with direction provided to staff found in other sections of the same policy.</p>

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 his 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 will 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.

Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, are permitted by IDOC to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse. 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."

The PCM indicated that Indiana Women's Prison 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 inmate grievances alleging sexual abuse that resulted in disciplinary action by the agency against the inmate for having filed the grievance in bad faith was zero. In the past 12 months, the number of inmate emergency grievances files pursuant to this standard was zero as confirmed by the PREA Compliance Manager and Warden. Indiana Women's Prison 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 02-01-115, Sexual Abuse Prevention
- Policy 02-04-101, Violation for Bad Faith Report
- Interviews with staff (specialized and random)
- Interviews with inmates (random and targeted)
- Interview with the PREA Compliance Manager
- Inmate Handbook and Brochure
- Memorandum: From the Warden regarding third-party grievance filed on behalf of an inmate related to sexual abuse

Cautionary Note:

- While the agency met the requirements of Standard 115.53 this Auditor highly recommends that the agency consider a policy modification to clarify the Offender Grievance Process, 00-02-301.

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 271 1481 432">Policy 02-11-115 (Sexual Abuse Prevention) addresses the requirements of Standard 115.53. This facility never detains inmates solely for civil immigration purposes therefore the Auditor considers Indiana Women's Prison exempt from Standard 115.53 (a) as it pertains civil detention. 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. PREA posters and victim advocacy information was observed posted during the facility tour through living units and in common areas for viewing.</p> <p data-bbox="240 461 1490 589">IDOC Policy 02-01-115 Sexual Abuse Prevention, Policy 02-01-102, Inmate Visitation, PREA posters, PREA pamphlets, Inmate Handbook, and the Victim Advocacy agreement with the Indiana Coalition Against Domestic Violence (ICADV) were provided through an online platform (Syncplicity) for the Auditor's review. Both policies along with PREA related informational brochures and service agreements all address Standard 115.53.</p> <p data-bbox="240 618 1490 714">By examination, the Auditor determined that IDOC and by extension Indiana Women's Prison Correctional Facility has a paid contract with the Indiana Coalition Against Domestic Violence (ICADV). The Auditor examined a contractual agreement (E-Contract 22593-A5) between ICADV and the IDOC. The scope of services provided by ICADV include:</p> <ol data-bbox="240 743 1358 920" style="list-style-type: none"> 1. Provide the victim a person they can talk to about what happened to them confidentially for crisis intervention. 2. Provide the offender a plan to address the trauma caused by the sexual abuse. 3. Provide referrals to services that provide ongoing support during and after release and to provide victim advocacy emotional support, crisis intervention, information, and referrals to inmates assigned to IDOC facilities. <p data-bbox="240 949 1490 1010">The initial contractual agreement with ICADV was dated 12/7/2018, expired on 9/30/2019, it was amended on 2/10/2020 and expired on 5/31/2020 now extended to March 31, 2022.</p> <p data-bbox="240 1039 1465 1135">From each living unit any inmate victim of sexual abuse or harassment, may request victim advocacy services from ICADV by: Calling toll free to the ICADV hotline from the inmate phone system by dialing #66. Inmates are advised from the recording if you get an answering service leave your name, DOC# and facility in the message or writing:</p> <p data-bbox="240 1164 722 1191">Indiana Coalition Against Domestic Violence</p> <p data-bbox="240 1220 542 1247">Attn: IDOC Victim Advocate</p> <p data-bbox="240 1276 700 1303">1915 W. 18th Street, Indianapolis, IN 46202</p> <p data-bbox="240 1332 1490 1460">Specifically, Indiana Women's Prison Correctional Facility provides inmates with access to outside victim advocates for emotional support services related to sexual abuse. The Indiana Coalition Against Domestic Violence (ICADV), Indiana VINE (victim assistance), AbuseLawsuit.com, and Maryville University (Understanding the Me-Too Movement: A Sexual Harassment Awareness Guide).</p> <p data-bbox="240 1489 1461 1688">During interviews with inmates (random and targeted) each confirmed that they have access to legal counsel if necessary, and it is not counted towards their weekly telephone call allotment. The same information is found in the posted on each living unit. Additional information was found in the inmate brochure. During interviews, the inmates (100%) (random and targeted) each group sampled confirmed telephone calling access at the facility. The facility maintains copies of the agreement with the Indiana Coalition Against Domestic Violence. Indiana Women's Prison Correctional Facility met the requirement of Standard 115.53.</p> <p data-bbox="240 1718 812 1744">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="240 1774 1093 2145" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-11-115 (Sexual Abuse Prevention) • Indiana Women's Prison Correctional Facility Memo: PREA Standard 115.53 • Indiana Women's Prison Correctional Facility Memo: PREA Standard 115.21 • Observations of the Auditor made during the facility tour • Memorandum of agreement with Indiana Coalition Against Domestic Violence • ICADV contact information E-Contract 48021 and E-Contract 22593-A5

- Interviews with inmates (random and targeted)
- Interviews with staff
- Interview with the PREA Coordinator
- Interview with the PREA Compliance Manager

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy 02-11-115 (Sexual Abuse Prevention) addresses the requirements of Standard 115.54. 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>IDOC Policy 02-01-115 Sexual Abuse Prevention, Policy 02-01-102, Inmate Visitation, PREA posters, PREA pamphlets, Inmate Handbook, Ombudsman Bureau, service agreement and the Victim Advocacy agreement with the Indiana Coalition Against Domestic Violence (ICADV) were provided through an online platform (Syncplicity) for the Auditor's review. Both policies, brochures, advocacy contact information along with other PREA related service agreements all address Standard 115.54.</p> <p>The IDOC established a method to receive third-party reports of sexual abuse and sexual harassment. The agency has distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate. The Auditor examined the notification on the agency website during an internet search.</p> <p>IDOC SEXUAL ABUSE AND SEXUAL HARASSMENT REPORTS</p> <p>To report an incident of sexual abuse or sexual harassment on behalf of a inmates please call (877) 385-5877, email IDOCPREA@idoc.in.gov or write or call:</p> <p style="text-align: center;">The Indiana Ombudsman Bureau</p> <p style="text-align: center;">402 W. Washington, Street., W479</p> <p style="text-align: center;">Indianapolis, IN 46204</p> <p>Reporting parties please note the following:</p> <ul style="list-style-type: none"> • The allegation will be discussed with the victim named in the report • The allegation will be disclosed only to those who need to know to ensure victim safety and to investigate the allegation • Please include the following information, if known, when reporting sexual abuse or sexual harassment: <ul style="list-style-type: none"> • Date of the alleged incident. • Victim's name and DOC number and facility • All alleged perpetrators names and DOC numbers • Location of alleged incident • Any other information provided regarding the incident <p>Indiana Women's Prison Correctional Facility met the requirement of Standard 115.54.</p> <p>Evidence relied upon to make Auditor determination:</p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-11-115 (Sexual Abuse Prevention) • Indiana Women's Prison Correctional Facility Memo: PREA Standard 115.54 • Victim Advocacy agreement with the Indiana Coalition Against Domestic Violence (ICADV) • Internet search: Indiana Department of Correction website • PREA Visitor Brochure

- PREA Adult Male/English/Spanish Brochure
- Phone interview: Indiana Ombudsman Bureau
- Internet Search: Indiana Ombudsman Bureau December 2019 Report (most recent)
- Interviews with staff (random and specialized)
- Interviews with inmates (random and targeted)
- Interview with the PREA Coordinator

115.61	Staff and agency reporting duties
	<p data-bbox="240 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 273 1489 465">Policy 02-01-115 (Sexual Abuse Prevention) addresses the requirements of Standard 115.61. Indiana Women's Prison is an adult female facility. The facility does not house youthful inmates under the age of 18. If the alleged sexual abuse involves an offender under eighteen (18) or an endangered/vulnerable adult, the incident shall be reported to the Child Protective Services as required in the administrative procedures for Policy 03-02-103, "The Reporting, Investigation and Disposition of Child Abuse and Neglect," or by contacting the Adult Protective Services at Indiana Family and Social Service Administration (FSSA).</p> <p data-bbox="240 501 1489 689">By examination and through interviews, the Auditor determined that Indiana Department of Correction staff/volunteers and contractors are mandated reporters and are required by policy 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. It should be mentioned that IDOC/Indiana Women's Prison suspended volunteerism early in January of 2020. To date the suspension of volunteerism has not been lifted by the agency.</p> <p data-bbox="240 725 1436 815">By examination, the Auditor determined that the agency requires 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.</p> <p data-bbox="240 851 1473 972">Interviews with staff (random and specialized) support compliance with this standard. Random and specialized staff (100%) confirmed that the agency requires 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.</p> <p data-bbox="240 1008 1489 1196">A review of the PREA training curriculum also confirms that the agency informs all staff, volunteers, and contractors to report any PREA related incident or suspicion of an incident to a supervisor immediately. Specialized staff sampled, medical and mental health practitioners confirmed their duty to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services. Interviews with a sample of target and random inmates interviewed confirmed that during their initial visit with a medical and mental health practitioner they were informed of the practitioner's duty to report, and the limitations of confidentiality.</p> <p data-bbox="240 1232 1489 1388">The Auditor also interviewed, the Warden, the PREA Compliance Manager and PREA Investigator during separate interviews, each confirmed during their respective interviews an understanding of their role and responsibility that upon receiving any allegation of sexual abuse, to promptly report the allegation to the appropriate IDOC office. Interviews with staff (random and specialized) support compliance with Standard 115.61. Indiana Women's Prison met the requirements of Standard 115.61.</p> <p data-bbox="240 1424 810 1451">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="240 1478 759 2024" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115 (Sexual Abuse Prevention) • IWP Memo: PREA Standard 115.61 • PREA training curriculum • Interviews with staff (random and specialized) • Interview with the PREA Coordinator • Interview with the Warden • Inmate interviews: targeted group • Review of investigative files • Interview with staff: Random and specialized <p data-bbox="240 2051 427 2078">Cautionary Note:</p> <p data-bbox="240 2114 1430 2141">While the Indiana Department of Corrections requires all staff to report immediately and according to agency policy any</p>

knowledge, suspicion, or information regarding an incident of sexual abuse, sexual harassment or information regarding retaliation that occurred in a facility, whether or not it is part of the agency, the Auditor found evidence of facility staff failure to report sexual abuse and sexual harassment.

While the Indiana Department of Corrections requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities the Auditor found evidence that the Indiana Women's Prison failed to rectify the causal behavior that may have contributed to an incident of sexual abuse, sexual harassment or retaliation. Where applicable this problematic issue will be addressed in the applicable standard.

115.62	<p>Agency protection duties</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Policy 02-01-115 (Sexual Abuse Prevention) addresses the requirements of Standard 115.62. The policy requires staff to take immediate action to protect an inmate when he is identified as being subject to substantial risk of imminent sexual abuse. The Auditor interviewed random and specialized staff during the onsite portion of the audit. Sample random and specialized staff confirmed a duty to protect the sexual safety of an inmate when the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse. The Auditor interviews with the PREA Compliance Manager and PREA Investigator for this audit. Each interviewee (PREA Compliance Manager and Investigator) detailed their role and responsibility to protect vulnerable inmates in substantial risk of imminent sexual abuse from abusive inmates. The Auditor interviewed a sample of random and targeted inmates who indicated that they understood how to seek assistance from the facility and or third-party's to immediately notify a trusted staff person of the imminent danger to their sexual safety. Indiana Women's Prison met the requirements of Standard 115.62.</p> <p>Evidence relied upon to make Auditor determination:</p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115, Sexual Abuse Prevention • Indiana Women's Prison facility memo: PREA Standard 115.62 (a) 2 • Interviews with staff (Random and Specialized) • Interview with the PREA Coordinator • Interview with the Warden • Interview with the PREA Investigator • Interview with the PREA Compliance Manager • Interview with the PREA Executive Director • Interview with inmates (random and targeted)
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115.63	<p data-bbox="231 71 1508 1279">Reporting to other confinement facilities</p> <p data-bbox="231 145 1508 190">Auditor Overall Determination: Meets Standard</p> <p data-bbox="231 212 1508 257">Auditor Discussion</p> <p data-bbox="231 280 1508 470">Policy 02-01-115 (Sexual Abuse Prevention), Indiana Department of Corrections Protection Duties addresses the requirement of Standard 115.63. The 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="231 504 1508 627">The Auditor interviewed the Warden for this standard. The Warden detailed his responsibility under Standard 115.63. Further, the Warden explained that if he received an allegation that an inmate was sexually abused at another facility, the notification process requires that he notify the head of the facility where the alleged abuse occurred within seventy-two (72) hours of receiving the allegation and the incident would be documented.</p> <p data-bbox="231 660 1508 750">According to the PAQ and confirmed by the PREA Compliance Manager and Warden, during the past 12 months, Indiana Women's Prison documented zero allegations were received that an inmate was abused while confined to another facility. Indiana Women's Prison met the requirements of Standard 115.63.</p> <p data-bbox="231 840 1508 873">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="231 896 1508 1265" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115 (Sexual Abuse Prevention) • Indiana Department of Corrections Protection Duties • Examined two allegations related to this standard • Interview with the PREA Compliance Manager • Interview with Warden • Interview with the PREA Coordinator/agency designee
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115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 271 1490 398">Policy 02-01-115 (Sexual Abuse Prevention) and Policy 02-01-115, Sexual Abuse Prevention, Policy 00-01-103, Investigations and Intelligence, A National Protocol for Sexual Assault Medical Forensic Examinations Adult/Adolescents 2nd ED., 4/2013 IDOC Sexual Assault Evidence Protocol and the Sexual Assault Prevention-Coordinated Response addresses the requirement of Standard 115.64.</p> <p data-bbox="240 439 1484 633">Policy 02-01-115 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 would still allow for the collection of physical evidence. Staff (random and specialized) (security/non-security) sampled clearly detailed their understanding of the actions to be taken upon learning that an inmate was sexually abused.</p> <p data-bbox="240 674 1493 835">Moreover, the first security staff member to respond to the report is required to: Separate the alleged victim and abuser, preserve and protect any crime scene until appropriate steps can be taken to collect any evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating if the abuse occurred within a time that still allows for the collection of physical evidence.</p> <p data-bbox="240 875 1477 1003">Further, the Auditor reviewed seventeen (17) investigative PREA reports were staff responded in time to obtain usable physical evidence, all confirmed that staff first responders took the appropriate steps such as, protecting the crime scene, protecting the victim, and implementing a coordinated response. Indiana Women's Prison met the requirements of Standard 115.64.</p> <p data-bbox="240 1043 810 1070">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="240 1111 1468 1637" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115 (Sexual Abuse Prevention) • Policy 00-01-103 (Investigation, and Intelligence) • Interviews with staff (random and specialized) • Interview with the PREA Compliance Manager • Investigations and Intelligence, A National Protocol for Sexual Assault Medical Forensic Examinations Adult/Adolescents 2nd ED., 4/2013 • Sexual Assault Response Team Curriculum • First Responders Evidence protocol • SART Overview • SART Victim Advocacy • SART Dynamics and Trauma of Sexual Violence • First Responder Evidence Protocol Investigations • Sexual Assault Prevention Directive • Interview First Responder (non-security) • Interview First Responder (security)

115.65	Coordinated response
	<p data-bbox="240 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 273 1445 398">Policy 02-01-115 (Sexual Abuse Prevention), Indiana Women's Prison Facility Directive IWP-II-006, Sexual Assault Response 2020, Staff and Indiana Department of Corrections Reporting Duties, Policy 00-01-103, Investigations, and Intelligence, Facility Directive, IWP-II-002, Major Crime Scene and Facility Directive, IWP-II-005, Evidence Recovery and Storage addresses the requirement of Standard 115.65.</p> <p data-bbox="240 434 1485 658">Indiana Women's Prison's Facility Directive IWP-II-006, Sexual Assault Response 2020, outlines a detailed 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. Indiana Women's Prison Facility Directive IWP-II-006, Sexual Assault Response 2020, Staff and Indiana Department of Corrections Reporting Duties, Policy 00-01-103, Investigations, and Intelligence, Facility Directive, IWP-II-002, Major Crime Scene and Facility Directive, IWP-II-005, Evidence Recovery and Storage support the IDOC Sexual Prevention Policy and coordinated response to sexual abuse.</p> <p data-bbox="240 694 1477 882">The PREA Coordinator affirmed during his interview that each facility is mandated to establish a Sexual Assault Response Team (SART) and develop a detailed written facility coordinated plan. Indiana Women's Prison has a documented written institutional coordinated plan among first responders to react to an incident of sexual abuse dated 3/2020. For example, the facility directive outlines responsibilities for the Nurse Manager shall without delay activate the procedure of the Department of Corrections (DOC) Healthcare Services Directive 2.30, " Sexual Assault," and contact St. Vincent's Hospital or Methodist EMTC to obtain the assistance of a SANE/SAFE examiner.</p> <p data-bbox="240 918 1485 1142">According to the PREA Coordinator, all SART Team members participate in comprehensive coursework, to enhance reactionary response time and recovery of evidence in a sexual assault incident. SART members are also charged with meeting the needs of the victim with support; provide a comprehensive forensic exam for victims; provide a joint effective, sensitive approach to victims; document and preserve evidence for potential prosecution; conduct investigations of the crime from notification through prosecution. At the facility level, Indiana Women's Prison ensures that an overall effective, and coordinated response occurs for victims of sexual assault. Indiana Women's Prison was reviewed by the Auditor. The Coordinated Response Plan supports Standard 115.65.</p> <p data-bbox="240 1178 1493 1267">Individual interviews with the PREA Coordinator provided a detailed understanding of the role and responsibilities of SART and first responders including medical and mental health practitioners, investigators, and facility executive staff in the event of an incident of sexual assault.</p> <p data-bbox="240 1303 1477 1393">Furthermore, interviews with a sample of specialized staff confirmed for the Auditor that each staff member sampled was knowledgeable of their duties in response to an allegation of sexual abuse and they were also knowledgeable regarding the IWP coordinated response plan. Indiana Women's Prison met the requirements of Standard 115.65.</p> <p data-bbox="240 1429 887 1456">Policy, Materials, Interviews and Other Evidence Reviewed:</p> <ul data-bbox="240 1491 1445 1883" style="list-style-type: none"> <li data-bbox="240 1491 544 1518">• Pre-Audit Questionnaire <li data-bbox="240 1554 743 1581">• Policy 02-01-115 (Sexual Abuse Prevention) <li data-bbox="240 1617 807 1644">• Policy 00-01-103, (Investigations, and Intelligence) <li data-bbox="240 1680 1445 1733">• Indiana Women's Prison Coordinated Response, Indiana Women's Prison Directive, Healthcare Services Directive 2.30, " Sexual Assault <li data-bbox="240 1769 919 1796">• Staff and Indiana Department of Corrections Reporting Duties <li data-bbox="240 1832 791 1859">• Facility Directive, IWP-II-002, Major Crime Scene <li data-bbox="240 1895 919 1921">• Facility Directive, IWP-II-005, Evidence Recovery and Storage

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The facility does not have any responsibility for this standard, you do not need to audit it. IWP met the requirements of Standard 115.66.

115.67	Agency protection against retaliation
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 329 1453 456">Policy 02-01-115 Sexual Abuse Prevention and Policy 00-01-103, Investigations, and Intelligence collectively address the requirements of Standard 115.67. The agency shall establish 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, and shall designate which staff members or departments are charged with monitoring retaliation.</p> <p data-bbox="242 488 1490 580">Policy 00-01-103, Investigations, and Intelligence requires the Office of Investigation and Intelligence to ensure the protection of inmates and staff who have reported sexual abuse or sexual harassment or who have cooperated in a sexual abuse or sexual harassment investigation.</p> <p data-bbox="242 611 1453 739">The agency has designated which staff members or departments are charged with monitoring retaliation. The agency has designated the PREA Committee to monitor staff and inmates for signs of retaliation. Specifically, at IWP, the PREA Compliance Manager facilitates the PREA Committee meetings. The PREA Committee designates a committee member (Unit Team Staff) to monitor a staff or inmate for signs of retaliation.</p> <p data-bbox="242 770 1474 929">The Auditor interviewed the PREA Compliance Manager. As the facilitator of the PREA Committee, the PREA Compliance Manager explained her role. In detail, the PREA Compliance Manager provided the Auditor with examples of protective measures to employ to protect an inmate or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. The Auditor also examined IDOC, PREA Retaliation Monitoring forms which included monitoring efforts that occurred in the last 12-month period.</p> <p data-bbox="242 960 1474 1088">Inmates being monitored were monitored face-to-face as necessary at intervals of 30, 60, 90 days. The PCM indicated that retaliation monitoring in rare instances could extend beyond 90 days if monitoring were deemed necessary beyond the established timeframes. The Auditor examined seventeen (17) Sexual/Harassment Incident Reports. Where applicable, Indiana Women's Prison implemented and documented retaliation monitoring of inmate victims of sexual abuse.</p> <p data-bbox="242 1120 1453 1247">During his interview the Warden indicated that IWP employs multiple protection measures, such as housing changes or transfers for inmates' victims or abusers, removal of alleged staff or inmates 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.</p> <p data-bbox="242 1279 1474 1406">More, 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 the facility would 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, monitor disciplinary reports, act promptly[to remedy any such retaliation occurring.</p> <p data-bbox="242 1438 1474 1496">The facility PAQ, 115.67 (c) - 5, indicated the number of times an incident of retaliation occurred in the past 12-month period as zero (0). After corrective action, IWP met the requirements of Standard 115.67.</p> <p data-bbox="242 1527 879 1556">Policy, Materials, Interviews and Other Evidence Reviewed:</p> <ul data-bbox="242 1588 919 1955" style="list-style-type: none"> <li data-bbox="242 1588 544 1617">• Pre-Audit Questionnaire <li data-bbox="242 1648 647 1677">• PREA Retaliation Monitoring Form <li data-bbox="242 1709 919 1738">• Indiana Women's Prison memo: PREA Standard 115.67 (a) 2 <li data-bbox="242 1769 919 1798">• Indiana Women's Prison memo: PREA Standard 115.67 (c) 1 <li data-bbox="242 1830 767 1859">• Interview with the PREA Compliance Manager <li data-bbox="242 1890 671 1919">• Interview with the PREA Coordinator <li data-bbox="242 1951 560 1980">• Interview with the Warden

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 210 451 237">Auditor Discussion</p> <p data-bbox="242 271 1469 331">Policy 02-01-115 (Sexual Abuse Prevention) and Policy 02-01-107 (The Use and Operation of Protective Custody) address the requirement of Standard of 115.68.</p> <p data-bbox="242 365 1485 591">Indiana Women's Prison will 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. The IWP PREA Compliance Manager confirmed that the facility has not placed an inmate who alleged to have suffered sexual abuse in an involuntary segregation unit. The Auditor interviewed random and targeted inmates during this audit. Each inmate sampled believed if their sexual safety were at issue, they would be protected from harm in segregation until transferred to another facility. Zero inmates sampled during the onsite portion of the audit indicated being placed in segregation for a PREA related incident for greater than 30 days. Indiana Women's Prison met the requirements of Standard 115.68.</p> <p data-bbox="242 624 879 651">Policy, Materials, Interviews and Other Evidence Reviewed:</p> <ul data-bbox="242 678 948 1106" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115 (Sexual Abuse Prevention) • Policy 02-01-107 (The Use and Operation of Protective Custody) • Interview with the Warden • Interview with the PREA Compliance Manager • Interview with staff who supervise segregation • Facility tour of the restrictive unit • PREA Housing Assignment Review Form

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy 02-01-115, Sexual Assault Prevention and Policy 00-01-103, Investigation and Intelligence collectively address the requirements of Standard 115.71. IDOC criminal, third party, administrative and anonymous investigations are conducted by the Office of Investigations (I&I).</p> <p>Policy 02-01-115 and 00-01-103, IDOC administrative and criminal investigations are documented, and the appropriate investigation is forwarded to the prosecutor's office or law enforcement when applicable. Policy 02-01-115, Sexual Assault Prevention and Policy 00-01-103, Investigation and Intelligence indicates that IDOC uses investigators who have received specialized training in sexual abuse investigations.</p> <p>An investigator interviewed during the audit confirmed that the investigative process includes to: Gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data, interviews of alleged victims, suspected perpetrators, and witnesses, the review of prior reports and complaints of sexual abuse involving the suspected perpetrator. Further, when the quality of evidence appears to support criminal prosecution, IDOC sworn Correctional Police Officers (CPO) conducts compelling interviews only in conjunction with local prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.</p> <p>The Auditor found no evidence of the use of a polygraph examination or other truth-telling device in the reports sampled for this audit. Policy 00-01-103, Investigation and Intelligence, staff members are mandated to cooperate with all investigations. Indiana Women's Prison ensures that the departure of an alleged abuser from the employment or control of the agency did not provide a basis for terminating an investigation. Indiana Women's Prison met the requirements of Standard 115.71.</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed:</p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115 (Sexual Abuse Prevention) • Policy 00-01-103 (Investigations and Intelligence) • Interview with the investigator • Interview with the PREA Compliance Manager • Interview with the PREA Coordinator • Interview with the Warden • Review: Probable Cause Affidavit (4) examples

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 453 237">Auditor Discussion</p> <p data-bbox="240 271 1465 331">Policy 00-01-103, Investigations, and Intelligence and 03-02-10, Policy and Administrative Procedure, addresses Standard 115.72.</p> <p data-bbox="240 362 1461 456">“The Department of Correction shall establish an Office of Investigations and Intelligence (OI) that shall be responsible for conducting investigations of alleged misconduct by staff and offenders/youths and assisting in maintaining safety and security in the Department’s facilities.”</p> <p data-bbox="240 488 1493 680">The agency has established the standard for substantiation of an investigative incident of sexual abuse or sexual harassment as preponderance of evidence. According to the agency PREA Investigator who was interviewed telephonically during the audit process, when evidence supports criminal prosecution, the agency consults with the prosecutor prior to moving forward in the investigative process and conducting compelled interviews. Likewise, the same investigator she affirmed that the standard threshold for evidence when determining whether allegations are substantiated is preponderance of evidence. Indiana Women’s Prison met the requirements of Standard 115.72.</p> <p data-bbox="240 712 879 739">Policy, Materials, Interviews and Other Evidence Reviewed:</p> <ul data-bbox="240 770 799 967" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 00-01-103 (Investigation and Intelligence) • Indiana Women’s Prison: PREA Standard 115.72 • Interview with the PREA Compliance Manager

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 210 453 237">Auditor Discussion</p> <p data-bbox="242 271 1485 701">Policy 02-01-115 (Sexual Abuse Prevention) and Policy 00-01-103 (Investigations and Intelligence) both address the requirement of Standard 115.73. 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. Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, 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 inmate whenever: 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 in the facility, or the agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility. According to the Indiana Women's Prison 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 or the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. All such notifications and attempts of notifications were documented. Indiana Women's prison met the requirement of Standard 115.73.</p> <p data-bbox="242 730 812 757">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="242 788 798 1099" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115 (Sexual Abuse Prevention) • Policy 00-01-103 (Investigations and Intelligence) • Review of investigative files • Interview with the PREA Compliance Manager • PREA inmate notification

115.76	Disciplinary sanctions for staff
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 1477 432">Policy 02-01-115 (Sexual Abuse Prevention) and Policy 04-03-103 (Information and Standards of Conduct for Departmental Staff) addresses the requirement of Standard 115.76. The policy 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 is also grounds for terminating employment.</p> <p data-bbox="242 463 598 492">The agency defines misconduct as:</p> <p data-bbox="242 521 1445 582">Behavior by a staff person which violates a standard, rule, regulation, policy, procedure, directive, written or verbal order, agreement, responsibility, performance expectation, or condition of employment of the State and/or the Department.</p> <p data-bbox="242 611 1465 672">The agency defines staff person as: staff or staff person (s) as persons employed by the Department, including contractors and volunteers.</p> <p data-bbox="242 678 1485 907">Policy 04-03-103 Information and Standards of Conduct for Departmental Staff, specifically states; A staff person who violates a State and/or Department standard, rule, regulation, policy, procedure, directive, written or verbal order, agreement, responsibility, or condition of employment may be subject to disciplinary action, up to and including dismissal, in accordance with IC 4-15-2.2-24 which states, "An employee in the unclassified service is an employee at will and serves at the pleasure of the employee's appointing authority, and may be dismissed, demoted, disciplined, or transferred for any reason that does not contravene public policy." Dismissal shall be the presumptive disciplinary sanction for a staff person that violates the Department's sexual abuse or sexual harassment policies.</p> <p data-bbox="242 969 1489 1131">During the audit process and an interview with the HR representative the Auditor confirmed that staff terminated for violations of the State, agency sexual abuse or sexual harassment policies, would be reported to the relevant licensing bodies and law enforcement agencies (unless the activity or behavior was clearly not criminal). More, formal terminations and presumptive terminations by staff who would have been terminated if not for their resignation, would also be reported to law enforcement (unless the activity was clearly not criminal).</p> <p data-bbox="242 1160 1489 1422">The examination of evidence related to this standard was reviewed by the Auditor. In the past 12 months, Indiana Women's Prison had (1) criminal case pending in the prosecutor's office for violating the agency policy and the Code of Ethics. In the past 12 months, The PREA Compliance Manager indicates that 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 two (2). In the past 12 months, The PREA Compliance Manager indicated that 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 one (1). Indiana Women's Prison met the requirements of Standard 115.76.</p> <p data-bbox="242 1451 879 1480">Policy, Materials, Interviews and Other Evidence Reviewed:</p> <ul data-bbox="242 1509 1222 2107" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 04-03-103 (Information and Standards of Conduct for Departmental Staff) • Policy 02-01-115 (Sexual Abuse Prevention) • Indiana Women's Prison, HR representative • Interview with the PREA Compliance Manager • Policy 04-03-103 Information and Standards of Conduct for Departmental Staff • Internet search: Indiana Code (IC) 4-15-2.2-24, Unclassified service; at will employee • Internet search: Inspector General's website: Code of Ethics, http://www.in.gov/ig/2236.htm. • Notice of staff gate closures and terminations • Review of investigation files • Sexual Abuse Incident Review

115.77	Corrective action for contractors and volunteers
	<p data-bbox="240 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 273 1445 365">Policy 02-01-115 Sexual Abuse Prevention, Policy 04-03-102, Human Resources, Policy 00-01-103 Investigations and Intelligence, and Policy 04-03-103 Information and Standards of Conduct for Departmental Staff collectively address and outline the agency's disciplinary response related to violations of PREA policies by staff.</p> <p data-bbox="240 396 1485 488">Specifically, disciplinary sanctions for staff may include sanctions up to termination. Contractors or volunteers who engage in sexual abuse are prohibited from contact with inmates. Further, any contractor or volunteer who engages in sexual abuse is reported to: Law enforcement agencies or regulatory licensing bodies.</p> <p data-bbox="240 519 1493 678">Policy 04-03-102, Human Resources defines staff as: Any person(s) performing work on behalf of the Department, including contractors and volunteers' states: That any contractor or volunteer engaging in sexual abuse of inmates will be subject to referral to local law enforcement. The policy further requires that the contractor or volunteer be prohibited from having contact with inmates. According to the PREA Compliance Manager, zero (0) contractors were dismissed or terminated and therefore prohibited from contact with inmates.</p> <p data-bbox="240 710 596 736">The agency defines misconduct as:</p> <p data-bbox="240 768 1453 831">"Behavior by a staff person which violates a standard, rule, regulation, policy, procedure, directive, written or verbal order, agreement, responsibility, performance expectation, or condition of employment of the State and/or the Department."</p> <p data-bbox="240 862 1485 1122">Policy 04-03-103 Information and Standards of Conduct for Departmental Staff, specifically states; A staff person who violates a State and/or Department standard, rule, regulation, policy, procedure, directive, written or verbal order, agreement, responsibility, or condition of employment may be subject to disciplinary action, up to and including dismissal, in accordance with IC 4-15-2.2-24 which states, An employee in the unclassified service is an employee at will and serves at the pleasure of the employee's appointing authority, and may be dismissed, demoted, disciplined, or transferred for any reason that does not contravene public policy. Dismissal shall be the presumptive disciplinary sanction for a staff person that violates the Department's sexual abuse or sexual harassment policies. Indiana Women's Prison met the requirements of Standard 115.77.</p> <p data-bbox="240 1153 810 1180">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="240 1211 1171 1697" style="list-style-type: none"> <li data-bbox="240 1211 504 1238">• Pre-Audit Questionnaire <li data-bbox="240 1270 699 1296">• Policy 02-01-115, Sexual Abuse Prevention <li data-bbox="240 1328 635 1355">• Policy 04-03-102, Human Resources <li data-bbox="240 1386 754 1413">• Policy 00-01-103, Investigations, and Intelligence <li data-bbox="240 1444 1054 1471">• Policy 04-03-103, Information and Standards of Conduct for Departmental Staff <li data-bbox="240 1503 727 1529">• Interview with the PREA Compliance Manager <li data-bbox="240 1561 975 1588">• Examined termination notices for contractors and "gate closure notices" <li data-bbox="240 1619 1110 1646">• Internet search: Indiana Code (IC) 4-15-2.2-24, Unclassified service; at will employee <li data-bbox="240 1677 1171 1704">• Internet search: Inspector General's website: Code of Ethics, http://www.in.gov/ig/2236.htm

115.78	Disciplinary sanctions for inmates
	<p data-bbox="240 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 210 451 239">Auditor Discussion</p> <p data-bbox="240 271 1469 465">Policy 02-04-101 Disciplinary Code for Adult Offenders address Standard 115.78. Policy 02-04-101 Disciplinary Code for Adult Offenders states that sexual contact between persons that 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 inmates engaged in inmate-on-inmate sexual abuse and 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.</p> <p data-bbox="240 497 1477 790">More, the Warden indicated during her 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 her behavior. When applicable Indiana Women's Prison would consult with mental health practitioners and make recommendations for sanctions being imposed on inmates with cognitive or developmental disabilities. The Auditor interviewed mental health practitioners during the onsite portion of the audit. Each mental health practitioner interviewed confirmed that in collaboration with facility managers at the Indiana Women's Prison they would be consulted regarding sanctions being imposed on inmates with cognitive or developmental disabilities.</p> <p data-bbox="240 822 1485 947">The Auditor determined by examination that circumstances and disciplinary sanctions were comparable with other sanctions imposed on other inmates with similar offenses. A report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred would not constitute making a false report of an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation according to the Warden.</p> <p data-bbox="240 978 1477 1339">Further, interviews with medical and mental health practitioners during the audit confirmed that the facility offers therapy, counseling, or other interventions designed to address the emotional trauma resulting from an incident of sexual abuse or sexual harassment. The same sample of medical and mental health practitioners confirmed that IWP also offers therapy, counseling, or other interventions to the sexual aggressor, to correct underlying reasons or motivations for the abuse. The Auditor found no evidence to support this aspect of the standard in investigative reports sampled. Inmates sampled during the audit denied that therapy, counseling, or other interventions are only offered as a condition to access other program offerings or inmate incentives or benefits. More, targeted inmates sampled confirmed at least one conference with a mental health practitioner for PREA related reasons. Some inmates sampled indicate that they declined services while others remain on the mental health caseload to address challenges brought on by a history of victimization or abusiveness. The facility tour included an inspection of the restricted housing unit. Inmates housed in segregation confirmed rounds were conducted on a consistent basis by medical and mental health practitioners.</p> <p data-bbox="240 1370 1485 1496">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. There were on zero cases of inmate-on-inmate sexual activity that were determined to be nonconsensual. Indiana Women's Prison met the requirements of Standard 115.78.</p> <p data-bbox="240 1527 879 1556">Policy, Materials, Interviews and Other Evidence Reviewed:</p> <ul data-bbox="240 1588 898 2011" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-04-101 (Disciplinary Code for Adult Offenders) • Indiana Women's Prison: PREA Standard 115.78 a-3 & a-4 • Interview with the PREA Compliance Manager • Inmate handbook • Facility tour • Interview with mental health practitioners • Interview with the Warden

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 210 451 235">Auditor Discussion</p> <p data-bbox="242 271 1485 398">Policy 02-01-115 (Sexual Abuse Prevention) addresses the requirement of Standard 115.81. If the SVAT screening indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, Indiana Women's Prison would ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.</p> <p data-bbox="242 432 1458 521">If the SVAT screening 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 at the Indiana Women's Prison.</p> <p data-bbox="242 555 1485 712">According to medical and mental health practitioners interviewed during the onsite portion of this audit information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners and other correctional management 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</p> <p data-bbox="242 745 1485 902">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. Moreover, staff (random and specialized) interviews 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 100%. Records examined onsite confirmed that Indiana Women's Prison met the requirements of Standard 115.81.</p> <p data-bbox="242 936 879 960">Policy, Materials, Interviews and Other Evidence Reviewed:</p> <ul data-bbox="242 994 1026 1476" style="list-style-type: none"> <li data-bbox="242 994 531 1019">• Pre-Audit Questionnaire <li data-bbox="242 1052 735 1077">• Policy 02-01-115 (Sexual Abuse Prevention) <li data-bbox="242 1111 576 1135">• Offender information system <li data-bbox="242 1169 900 1193">• Auditor review of behavioral health and intake documentation <li data-bbox="242 1227 711 1252">• Sexual Violence Assessment Tool (SVAT) <li data-bbox="242 1285 1026 1310">• Informed Consent Form for medical and mental health treatment services <li data-bbox="242 1344 759 1368">• Interviews with medical and mental health staff <li data-bbox="242 1402 735 1426">• Interviews with random and specialized staff <li data-bbox="242 1460 754 1485">• Interview with the PREA Compliance Manager

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 453 237">Auditor Discussion</p> <p data-bbox="240 271 1485 566">Policy 02-01-115, Sexual Assault Prevention and the IDOC Sexual Assault Manual dated January 15, 2014 address Standard 115.82. The agency and Indiana Women's Prison by extension require timely and unimpeded access to emergency medical treatment, crisis intervention and victim advocacy services. The Auditor sampled specialized staff during the audit to determine their understanding of their role and responsibility under this standard. Specialized medical practitioners confirmed that IWP offers inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. Furthermore, the same practitioners confirmed that the nature and scope of service provided to the inmate population is based according to their professional judgment. The Auditor also examined sexual victimization incidents which occurred in the past 12 months where the inmate was transported to the hospital for examination by a SANE nurse.was zero.</p> <p data-bbox="240 600 1485 757">IDOC has a contract with local hospitals to provide emergency services to include SANE examines to inmates. Moreover, the contract for payment includes Indiana Women's Prison to provide treatment services for inmate care. The Auditor determined compliance with Standard 115.21 (c) and 115.82 through review of PREA investigative incident reports of sexual abuse the review of investigative files from the past 12-month period. Indiana Women's Prison met the requirements of Standard 115.82.</p> <p data-bbox="240 790 810 817">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="240 846 766 1216" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115 (Sexual Abuse Prevention) • Review of an investigation file • Interviews with medical staff • IDOC Sexual Assault Manual • Interview with the PREA Compliance Manager • Interview with security first responder

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	<p data-bbox="240 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 273 1489 365">Policy 02-01-115, Sexual Assault Prevention and the IDOC Sexual Assault Manual dated January 15, 2014 address Standard 115.83. Policy 02-01-115 and IDOC Sexual Assault Manual mandates IDOC facilities provide victims with medical and mental health services equivalent to the level of care found in the community.</p> <p data-bbox="240 398 1477 591">Policy 02-01-115 and IDOC Sexual Assault Manual also mandates appropriate tests be provided to the inmate victim as determined by medical and mental health practitioners. According to mental health practitioners interviewed during the audit confirmed that they 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. Furthermore, if a sexual victimization occurs in an institutional setting, the inmate victim of sexual abuse would be offered tests for sexually transmitted infections as medically indicated.</p> <p data-bbox="240 624 1449 748">Policy 02-01-115 requires that Indiana Women's Prison attempts to obtain a mental health evaluation within 60 days of learning of inmate-on-inmate with a history of abusiveness and offer treatment to address the underlying reason for the behavior. Individual interviews with a sample of medical and mental health practitioners confirmed their understanding of their role and responsibility under Standard 115.83.</p> <p data-bbox="240 781 1489 1008">The PREA Compliance Manager and Warden confirmed during individual interviews with the Auditor that medical services by policy are provided to the victim of a sexual assault at no financial cost. Indiana Code (IC) 11-10-3-5, Co-payment requirements; exceptions. IC 11-10-3-5 outlines 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 as a result of an injury received in the correctional facility; or (3) the service is provided at the request of the administrator of a correctional facility. The agency offers all inmates who experience sexual abuse access to forensic medical examinations on-site, without financial cost, where evidentiary or medically appropriate. Indiana Women's Prison met the requirements of Standard 115.83.</p> <p data-bbox="240 1070 810 1097">Evidence relied upon to make Auditor determination:</p> <ul data-bbox="240 1131 970 1671" style="list-style-type: none"> • Pre-Audit Questionnaire • Policy 02-01-115 (Sexual Assault Prevention) • Inmates handbook • Interview with specialized staff (medical and mental health practitioner) • Interview with the PREA Compliance Manager • Interview with the PREA Coordinator • Interview with the Warden • IDOC Sexual Assault Manual • Review of investigation past 12 months • Review of SVATS

115.86	Sexual abuse incident reviews
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Policy 02-01-115, Sexual Assault Prevention addresses Standard 115.86. The facility PREA Committee is mandated by IDOC 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 style="list-style-type: none"> 1. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; 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; 3. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; 4. Assess the adequacy of staffing levels in that area during different shifts; 5. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; 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, 7. The facility shall implement the recommendations for improvement or document its reasons for not doing so. <p>The Auditor examined investigative reports, coupled with supplemental documentation from the past 12-month period. Problematic, the Auditor determined that while Indiana Women's Prison routinely conducted incident reviews at the conclusion of every sexual abuse investigation with substantiated or unsubstantiated findings. The facility failed to implement recommendations for improvement or document its reason for not doing so.</p> <p>The Auditor confirmed by examination that the Indiana Women's Prison: Prepares 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 submits the report to the Warden, Interviews with staff revealed that they understood the purpose of the incident review team and the process. After corrective action, Indiana Women's Prison met the requirements of Standard 115.86.</p> <p>Evidence relied upon to make Auditor determination:</p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire • Review of investigative sexual abuse reports in the past 12-month period • Interview with Sexual Abuse Incident Review Team member • Interview with the PREA Compliance Manager • Review of facility PREA Committee Meetings Minutes • Indiana Women's Prison: PREA Standard 115.86 a-2 & b-2 <p>Corrective action:</p> <p>Document training on Standard 115.86 for all PREA Committee members, IWP correctional management and all staff. Document attendance with a printed name, staff signatures and dates. Provide the Auditor with evidence of all corrective actions taken to gain compliance with this standard.</p>

115.87	Data collection
	Auditor Overall Determination: Audited at Agency Level
	Auditor Discussion

115.88	Data review for corrective action
	Auditor Overall Determination: Audited at Agency Level
	Auditor Discussion

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

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor confirms she had access to, and the ability to observe, all areas of the audited facility. The Auditor was permitted to request and receive copies of any relevant documents (including electronically stored information). The Auditor permitted to conduct private interviews with inmates, residents, and detainees. IWP inmates were permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel. Indiana Women's Prison met the requirements of Standard 115. 401.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Audited at Agency Level
	Auditor Discussion

Appendix: Provision Findings		
115.11 (a)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.11 (c)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
115.12 (a)	Contracting with other entities for the confinement of inmates	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	yes
115.12 (b)	Contracting with other entities for the confinement of inmates	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	yes

115.13 (a)	Supervision and monitoring	
	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
115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes

115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes
115.14 (a)	Youthful inmates	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (b)	Youthful inmates	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (c)	Youthful inmates	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.15 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.15 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes

115.15 (d)	Limits to cross-gender viewing and searches	
	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
115.15 (e)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.15 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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

115.16 (c)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
115.17 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone 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
115.17 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
115.17 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes

115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	Hiring and promotion decisions	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.18 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	na
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

115.21 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating 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
115.21 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	na
115.22 (a)	Policies to ensure referrals of allegations for investigations	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes

115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does 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
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes

115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	Inmate education	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	Inmate education	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	Inmate education	
	Have all inmates received 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

115.33 (d)	Inmate education	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes
115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
115.33 (f)	Inmate education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes
115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators 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
115.34 (b)	Specialized training: Investigations	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (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
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (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
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (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
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes
115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, 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
115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to 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
115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.41 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates?	yes
115.42 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.42 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
115.42 (c)	Use of screening information	
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems?	yes

115.42 (d)	Use of screening information	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes
115.42 (e)	Use of screening information	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
115.42 (f)	Use of screening information	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
115.42 (g)	Use of screening information	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (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
115.43 (a)	Protective Custody	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes

115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts 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
115.43 (c)	Protective Custody	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
115.43 (d)	Protective Custody	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
115.43 (e)	Protective Custody	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.51 (a)	Inmate reporting	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes

115.51 (b)	Inmate reporting	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes

115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
115.52 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes

115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (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
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes

115.61 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	no
115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.63 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes

115.64 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	no
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes

115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	no
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes

115.76 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	Disciplinary sanctions for inmates	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	Disciplinary sanctions for inmates	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	Disciplinary sanctions for inmates	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes

115.78 (f)	Disciplinary sanctions for inmates	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
115.78 (g)	Disciplinary sanctions for inmates	
	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
115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
115.81 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
115.82 (a)	Access to emergency medical and mental health services	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes

115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. 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.)	yes
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. 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.)	yes
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes
115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes

115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes