

# PREA Facility Audit Report: Final

**Name of Facility:** Desoto Correctional Institution

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** 07/16/2018

**Date Final Report Submitted:** 01/05/2019

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Darren Lanier Bryant	<b>Date of Signature:</b> 01/05/2019

AUDITOR INFORMATION	
<b>Auditor name:</b>	Bryant, Darren
<b>Address:</b>	
<b>Email:</b>	dbryant357@msn.com
<b>Telephone number:</b>	
<b>Start Date of On-Site Audit:</b>	05/30/2018
<b>End Date of On-Site Audit:</b>	06/1/2018

FACILITY INFORMATION	
<b>Facility name:</b>	Desoto Correctional Institution
<b>Facility physical address:</b>	13617 S.E. Highway 70, Arcadia, Florida - 34266
<b>Facility Phone</b>	863-494-3727
<b>Facility mailing address:</b>	
<b>The facility is:</b>	<input type="radio"/> County <input type="radio"/> Federal <input type="radio"/> Municipal <input checked="" type="radio"/> State <input type="radio"/> Military <input type="radio"/> Private for profit <input type="radio"/> Private not for profit
<b>Facility Type:</b>	<input checked="" type="radio"/> Prison <input type="radio"/> Jail

Primary Contact			
<b>Name:</b>	Lori Norwood	<b>Title:</b>	Assistant Warden
<b>Email Address:</b>	Lori.Norwood@fdc.myflorida.com	<b>Telephone Number:</b>	863-202-0107

Warden/Superintendent			
<b>Name:</b>	Patrick Murphy	<b>Title:</b>	Warden
<b>Email Address:</b>	Patrick.Murphy@fdc.myflorida.com	<b>Telephone Number:</b>	863-485-1300

Facility PREA Compliance Manager			
<b>Name:</b>		<b>Email Address:</b>	
<b>Name:</b>	Lori Norwood	<b>Email Address:</b>	Lori.Norwood@fdc.myflorida.com

Facility Health Service Administrator			
<b>Name:</b>	Sandra Peterson	<b>Title:</b>	Health Services Administrator
<b>Email Address:</b>	Speterson1@Centurionoffl.com	<b>Telephone Number:</b>	863-485-1326

Facility Characteristics		
<b>Designed facility capacity:</b>	1741	
<b>Current population of facility:</b>	1670	
<b>Age Range</b>	Adults: 18-81	Youthful Residents:
<b>Facility security level/inmate custody levels:</b>	Community, Minimum, Medium, Close	
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	340	

## 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 Prison Rape Elimination Act on-site audit at the Desoto Correctional Institution in Arcadia, Florida was conducted on May 29- June 1, 2018, by Darren L. Bryant. The auditor is a United States Department of Justice Certified Auditor for Adult facilities. This was the second PREA Audit for the Desoto Correctional Institution. The facility had an audit in November 4, 2014, which required Corrective Action. The auditor wished to extend his deepest appreciation to Warden Patrick Murphy and his staff at the institution for their professionalism, hospitality, and kindness. The auditor wanted to compliment Assistant Warden Lori Norwood and Sergeant Quezada for their at the Desoto Correctional Institution for their hard work in organizing the files that was provided to the auditor in advance of the on-site audit. This assisted the audit and auditor to move forward efficiently.

The pre-audit preparations consisted of a thorough review of all documentation and materials submitted by the facility including the " PREA- Audit Questionnaire " The documentation reviewed by this auditor included agency policies, procedures, forms, posters, pamphlets, brochures, handbooks, educational materials, training curriculums, organizational charts, and other PREA related materials the facility provided to demonstrate compliance with each PREA Standard.

The PREA- Audit began with an entrance meeting being conducted on Tuesday, May 29, 2018 at 2000 hours in the facility administration building. The following staff attended the entrance meeting listed below:

Warden Patrick Murphy  
Assistant Warden Lori Norwood  
Assistant Warden Mark James  
Colonel Johnny Morales  
Major Thomas Sager  
Classification Supervisor Jeannette Roberts  
Facility PREA Manager Sergeant Stephanie Quezada

After a brief discussion about the audit, the auditor interviewed some of the night shift staff and postponed the facility tour for the next morning, because of the time. The auditor random staff interviews lasted for approximately 2 hours and departed at 10:00 pm. The tour of the Annex was conducted on May 30, 2018, and the Work camp tour was completed on May 31, 2018.

The design capacity for the Annex is 1338, Work Camp 288. The total population at the time of the audit for both facilities 1677. The average daily population for the previous 12 months was 1670. There have been 2109 inmates assigned to Desoto since February 2018. There are 69 inmates that were assigned prior to August 20, 2012. The average length of stay at the facility is 1.8 years. The custody level of inmate population is close to community supervision. There is 340 staff members assigned. There has

been 118 new staff employed since August 2012.

The housing areas toured were a total of three (3) multi occupancy cell housing units, 6 open bay dormitory housing units and various departments within the secured perimeter. The various departments toured were Classification, Food Service, Medical, Mental Health, outside farm area, and Security. There are 256 beds utilized for Disciplinary and Administrative Segregation.

Once the tour was completed the auditor resume the portion of the audit. Prior to the on-site visit the facility supplied a list of offender names sorted by housing units, those with Limited English, and those with targeted designations. A list of employees and contractors names were also provided to the auditor. The auditor selected randomly from both list, a sampling of offender and staff to be interviewed. It was from these lists the auditor selected the targeted and random individuals to be interviewed. These random staff and offender interviews were conducted in a private setting.

There were 55 inmates interviewed during the on-site visit. Thirty five (35) inmates were randomly selected, twenty (20) were targeted. The targeted group consisted of ten (10) Disabled and limited English proficient, five (5) from the LGBTI, Two (2) segregation inmates, two (2) admitted to being victimized before confinement, one (1) reported sexual abuse, while housed at Desoto Correctional Institution. Each of the inmates interviewed acknowledged receiving PREA training and written materials outlining the agencies zero tolerance policies towards sexual abuse, sexual harassment, as well as the procedures for reporting during intake. The Disabled and Limited English Proficient Inmates interviewed confirmed receiving the PREA training, written materials, and televised information in languages they could understand. Those inmates with sight and hearing impairment had staff assistance during the orientation and throughout their stay at Desoto Correctional Institution. During the interviews with the offenders that had self reported as being Gay, or Bisexually all reported that staff treated them before and after self-reporting and never placed in any housing specifically designated for any group.

The auditor selected and carefully examined a random sampling of staff training files, and volunteer / contractor training files. The files were kept organized and in order. The reviewed were staff received training and signed the acknowledgement form. The auditor also selected and examined a sampling of offender files and observed documentation of the offender receiving PREA education, as well as documentation of risk screenings.

All investigative files were reviewed during the on-site visit and appeared to thoroughly document the investigation process per agency policy. Criminal investigative referrals were documented and proper referrals were made when warranted. All sexual abuse and harassment cases were referred to the Inspector Generals Office who evaluated each case to see if elements of a crime existed.

The Desoto Correctional Institution reported eleven (11) PREA allegations made in the last twelve months. Ten (10) were alleging sexual abuse and one (1) alleged sexual harassment. The ten sexual abuse allegations comprised of two involving staff and eight involving offenders. The one (1) sexual harassment allegations was inmate on inmate. The two (2) investigations of allegations against staff were unfounded. The other nine (9) cases involving inmate on inmate resulted in seven (7) unsubstantiated and two (2) unfounded.

At the conclusion of the on-site visit an exit meeting was held to discuss the audit findings. The following staff were in attendance: Warden Patrick Murphy, Assistant Wardens L. Norwood, M. Jones, Colonel Johnny Morales, Major Thomas Sager, Classification Supervisor Jeannette Roberts, PREA Manager Sgt.

S. Quezada, Statewide PREA Coordinator Kelly Eberlein.

The auditor explained the process that would follow the on-site visit. The auditor also explained that any standard findings of "Does Not Meet" during the audit would require corrective action and a possible follow-up visit to determine compliance. Finally, the auditor acknowledged the willingness of all staff involved to accomplish PREA compliance and advised the Central Office PREA Team and facility of their requirements to post the final report on the agency/ facility website once completed.

## 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.

Desoto Correctional Institution was established in 1969 and is located eleven miles east of Arcadia, Florida at 13617 SE Highway 70 East. Desoto Correctional Institution is a major correctional facility located in Desoto County. Formerly a World War II Air Corps Training Base Known as Dorr Field, the buildings were occupied by the Florida Division of Corrections in 1969. The Main Unit housed up to 800 inmates and was utilized until the Annex was completed in October 1996. The Main Unit was used by the Department of Children and Families to house sexually violent predators from 2000 to 2009. In 2010, Regional Emergency Response Teams began training in the Main Unit, and the facility continues to host specialized training classes.

The Annex Work Camp and Old Main Unit are situated on twelve hundred acres. The property also includes a Staff Training Building with firing range, a general supply warehouse, maintenance work area, and three staff housing areas. The acreage also facilitates a farm program which began in 1998 and utilizes 236 acres of land.

The Annex has a 12- foot double chain link perimeter fence reinforced with razor wire and motion sound detection systems. The Annex consists of eighteen buildings totaling 215,672 square feet with a capacity of housing 1,453 close, medium, minimum, and community custody inmates in a total of 9 housing unit, 3 secure cell housing and 6 open bay dormitories. Desoto Annex was completed and occupied in October of 1996. Section I contains the Security Building, Chapel, Education / Library, Vocational Education, Multi-Purpose Building, Laundry, and Food Service.

The inmate housing areas are contained in Section II and include three secure cell housing "T" Dormitories each of which can house up to 258 inmates, five prototypical Open Bay Dormitories which can house up to 144 inmates each and one Open Bay Dormitory which has been modified for Faith and Character Based Dorm housing and holds 128 inmates. "F" dormitory, the first "T" Dormitory houses Administrative and Disciplinary Confinement inmates. Two (2) barber shops and canteens are available to inmates, while the compound is open. The Recreation area is located beyond the housing units on the southern end of the facility grounds. Desoto Annex offers weekend and holiday visitation in an indoor and outdoor secure Visiting Park between the hours of 9:00 am to 3:00 pm.

The Work Camp has two open bay dormitories and houses 288 medium, minimum and community custody inmates. The open bay housing units have two sides and house 72 on each side for a total of 144. There is a visiting park, multipurpose building which contains the property room, canteen, barbershop, medical clinic, and a outside recreation field. The Work Camp is situated on 9 acres of land. The Desoto Work Camp was completed and occupied in 1990. The Work Camp consists of seven buildings totaling 26,982 square feet.

Desoto Work Camp accepts inmates up to medical grade three and mental health grade two. Inmates assigned to the Work Camp are eligible to participate in religious and recreation programs available at

the facility. They are also eligible for transfer to the Annex for participation in educational and vocational programs if appropriate. Desoto Work Camp offers weekend and holiday visitation in an indoor and outdoor secure Visiting Park between the hours of 9:00 am to 3:00 pm.

Desoto Work Camp currently supports four DC supervised Dept. of Transportation contracted squads, three (3) DC supervised Contract Work Squads and one DC supervised Public Work Squad.

The Arcadia Road Prison located in Arcadia is closed. The Road Prison has been closed for approximately 2 years.

The canteen is run by Keefe and stocks a wide variety of products. Both medical and mental health are privatized and run by Wexford.

A large training building and range is located outside the perimeter. The training building consist of an employee exercise room and showers. The Desoto Correctional Officer academy for Desoto and surrounding facilities is operated and directed by the facility training staff. The training staff conducts annual training for all staff, new employee orientation and training for all special squads.

A warehouse, garage, maintenance area, mail room, flammable materials storage, and generator buildings are also located outside the perimeter and compound.

The personnel and Business Office functions are now accomplished at the Regional Service Center.

The mission of Desoto Correctional Institution is to provide a continuum of services to meet the needs of those entrusted to our care, creating a safe and professional environment with the outcome of reduced victimization, safer communities and an emphasis on the premium life.

## AUDIT FINDINGS

### Summary of Audit Findings:

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

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

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

Number of Standards Met: 45

Number of Standards Not Met: 0

115.32, 115.41, 115.61, 115.76, 115.77

115.32- Florida Department of Corrections need to update their Training forms to show staff acknowledge they understand and received PREA Training. The current form only acknowledges they received the training, but doesn't acknowledge them understanding the content of the material.

115.41- The facility needs to conduct a second assessment for risk of victimization or abusiveness based upon any additional, relevant information. The facility does not conduct second assessments.

115.61- The current policy does not reflect staff to report any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment. The current policy needs to be updated to instruct employees to report any knowledge or suspicion of sexual abuse or harassment, and to protect staff and inmates against retaliation.

115.76- The current policy doesn't meet the standard. The current policy does not mention termination as the sanction for violating the agency zero tolerance policy, the policy doesn't indicate any disciplinary sanctions for violating agency policy. The current policy needs to be updated to reflect termination as a sanction, and indicate disciplinary sanctions for violating the agency zero tolerance policy.

115.77- The current policy does not address contractors or volunteers who engage in sexual abuse or harassment. The current policy needs to reflect contractors or volunteers will be reported to any law enforcement agency if engage in sexual abuse, any volunteer or contractor involved in sexual abuse will be reported to the licensing bodies.

The Corrective Action for the above standards will begin on July 17, 2018. The 180 days completion date will end on January 13, 2019. The agency has made an agreement with this auditor to send all updated policies, while working to become PREA compliant for this accreditation cycle. The agency will show 30 days proof to this auditor standard 115.41 by conducting the second assessments on inmates gained to the facility.

This agency has successfully submitted all updated documentation and met the intent of all PREA standards during the Corrective Action period.

## **Standards**

### **Auditor Overall Determination Definitions**

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

### **Auditor Discussion Instructions**

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

<b>115.11</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<p data-bbox="252 168 901 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 246 526 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 1476 616">The facility meets standard based on the policy 602.053. This was confirmed in staff and inmate interviews. All were aware of the Zero tolerance policy. Inmates received training upon arrival to the facility. Staff has been trained and is trained annually during their in-service training. The department has an agency wide coordinator and her sole responsibility is PREA. She coordinates with 42 other institutional PREA Managers. The PREA Coordinator was very knowledgeable about the PREA requirements and worked very hard to meet all PREA requirements.</p> <p data-bbox="252 660 1476 828">The auditor interviewed the Facility PREA Compliance Manager L. Norwood. She indicated that she has more then enough time to perform her PREA duties. She has been in this position about 2 years and reports directly to the Warden. The auditor interviewed staff and all acknowledged she is the point of contact for PREA.</p>

<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<p data-bbox="252 1032 901 1066"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 1111 526 1144"><b>Auditor Discussion</b></p> <p data-bbox="252 1189 1428 1312">Desoto Correctional Institution doesn't monitor any contract facilities, but they're under the authority of Florida Department of Corrections. The Florida Department of Corrections has several contract facilities throughout Florida.</p> <p data-bbox="252 1357 1476 1693">PREA Coordinator Kendra Prisk also does the contract monitoring for Florida Department of Corrections. She oversees all the operational practices, contract practices, and day to day operations of each contracted facility. One of her primary responsibilities in monitoring is to make sure that each of these contracted facilities is PREA Compliant and following Florida Department of Corrections Policies and Procedures. The agency has included in all contracts the requirements to adopt and comply with PREA Standards. All private facilities under contract with FDOC had successful PREA Audits and staff dedicated with knowledge of PREA Standards.</p> <p data-bbox="252 1738 1476 1816">Those private facilities are audited internally by Florida Department of Corrections PREA Audit Team quarterly.</p>

<b>115.13</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Shift Supervisors post orders number 3 requires each of them to conduct regular and random unannounced rounds to identify and deter staff and inmate sexual misconduct. This auditor interviewed supervisors from each shift and facility. All of them indicated that their rounds are documented by staff in the housing logbook, but the supervisors are also required to document in the Supervisory Logbook on post. This was verified by this auditor and their times were staggered.</p> <p>The auditor discussed annual reviews of the staffing plan with the facility PREA Compliance Manager. She confirmed that she considers current staffing levels and camera placements during their review. The auditor was provided the staffing review conducted in 2017.</p>

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Florida Department of Corrections do not house Youthful inmates with Adult Offenders. All Youthful inmates are housed separately from adult inmates, by designated facilities for youthful inmates. A State Statue (944.1905) was written by the Florida Legislatures.</p>

<b>115.15</b>	<b>Limits to cross-gender viewing and searches</b>
	<p data-bbox="247 168 901 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="247 246 526 280"><b>Auditor Discussion</b></p> <p data-bbox="247 324 1460 481">The Florida Department of Corrections has several policies ( 602.018, 602.036) in place prohibiting visual body searches and cavity searches by the opposite gender. A review of the search logs confirmed no cross gender visual body searches or cavity searches were performed.</p> <p data-bbox="247 537 1468 660">I learned during security staff and medical interviews staff that Transgender inmate genital is determined by medical staff after reviewing medical records, discussions with the inmate, and a broader medical examination.</p> <p data-bbox="247 705 1436 828">A review of the Training Logs and lesson plan confirmed that staff receive training on conducting proper pat searches, inappropriate relationship with inmates, and PREA, during their annual In-service training.</p> <p data-bbox="247 884 1428 996">A review of logbook documentation, and inmate interviews confirmed that female staff announce their presence, while entering the housing units. I observed several female staff announce their presence in the housing unit, while tour the facilities.</p>

<b>115.16</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<p data-bbox="247 1205 901 1238"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="247 1283 526 1317"><b>Auditor Discussion</b></p> <p data-bbox="247 1361 1476 1653">The auditor verified a staff translator list was available. The language line is available for use by staff when a staff translator is not available. An interview with the PREA Coordinator and several inmates with limited English confirmed information was delivered in different formats, written, video, English, and Spanish. The agency has policies in place to provide assistance to any inmate identifying as having special needs. Policy prohibits the use of inmate interpreters except in emergency situations or if the inmate's safety would be compromised. Staff and inmate interviews all supported that inmates would not be relied on as translators.</p> <p data-bbox="247 1709 1476 1912">The auditor interviewed two visually and hearing impaired inmates. All four inmates confirmed that staff assisted them during the Orientation phase. The hearing impaired inmates attested to a video with closed captioning and a staff member assigned to them if they had any questions or needed assistance, while housed at Desoto. The visually impaired confirmed that audio PREA information was available and a staff member was assigned to them.</p>

<b>115.17</b>	<b>Hiring and promotion decisions</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor reviewed policy 208.69 and determined prior to hiring of new employees who may have contact with inmates, the agency performs criminal background records check, consistent with Federal, State, and local law, makes its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending of an allegation of sexual abuse.</p> <p>The above policy applies to new employees, contract vendors, and volunteers. A random sample of employee files, and a interview with Human Resource Staff, it was confirmed the agency performs criminal background checks on all new hire employees.</p>

<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor toured all housing and Kitchen areas with Warden Murphy and learned seven new cameras were installed.</p> <p>The Desoto Correctional Institution updated their video monitoring system by installing seven new cameras in the Kitchen area. The cameras were installed in January 2018. The placement of these additional cameras enhanced the agency's ability to protect inmates from sexual abuse, while they're working in the Kitchen. The installation of the new cameras do not violate inmates privacy in performing bodily functions.</p>

<b>115.21</b>	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>In accordance with the review of policy 602.053, it was determined that this agency has policy and procedures in place that enables the Inspector General Office the responsibility of investigating any sexual criminal or administrative investigations. This agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The above information was also confirmed by interviewing several staff members and inspector Flutcher.</p> <p>The Department has a contract for SART Nurses to respond to the facility in case of an incident of sexual abuse. This was confirmed by reviewing the contract of Panhandle Forensic Nurse Specialist and interviewing one of their Supervising Doctors ( Dr. Scheffield ).</p> <p>The agency has a Mutual of Understanding with Safe Place And Rape Crisis Center. Inc. (SPARCC) to provide victim advocate services to inmates of sexual abuse.</p>

<b>115.22</b>	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor interviewed Warden Murphy, Assistant Warden Norwood, PREA Officer Quezada. and inspector Flutcher corroborated that all reports of sexual abuse or harassment are reported to the Inspector Generals office for investigations. Auditor also confirmed this by reviewing the following policies 108.001, 602.053.</p> <p>The auditor reviewed all investigative files and interviewed inspector Flutcher and confirmed 2 sexual abuse allegations were made against staff, but closed after completed investigation. 8 other sexual abuse allegations were inmate on inmate, 1 inmate on inmate allegation of sexual harassment were completed.</p> <p>The auditor located the investigative policy on the Website for the Inspector Generals Office. The Inspector General's Office is responsible and authorized for conducting criminal and administrative investigations for Florida Department of Corrections.</p>

<b>115.31</b>	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor reviewed the following policies 602.053, Prison Rape Elimination Act, reviewed its PREA Training, interviewed staff and reviewed Training files, it was determined that staff were receiving training on the agency's zero tolerance policy.</p> <p>Staff during the interviews corroborated that they receive the training every two years as required by the standard.</p>

<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The volunteer and contractor training form must show the auditor read and understood the training, after their training they must sign the form. The auditor reviewed some of the training forms, and it showed each volunteer and contractor has completed the read and sign acknowledgement form indicating they read their responsibilities, but the form doesn't have they understand their responsibilities.</p> <p>A review of the training records and interviews with contractors and volunteers confirm they received the training. They were questioned about their responsibilities, and all confirmed they understand the zero tolerance and reporting procedures.</p> <p>The updated volunteer and contractor training forms now reads, that they read and understand the PREA training. The training forms were updated on July 31, 2018 and implemented. Auditor was provided proofs of changed training forms with volunteer and contractor signatures. The agency documentation now meets this standard.</p>

<b>115.33</b>	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>All interviewed inmates confirmed that they received their PREA Orientation during the first day of arrival. The auditor reviewed policies, inmate handbook, Orientation materials and interviewed PREA Officer Quezada. Inmates complete the acknowledgement form indicating they have reviewed the PREA information.</p> <p>In accordance with the review of policy 602.053, it was determined that Desoto Correctional Institution has policies in place to ensure inmates with limited English, deaf, visually impaired, and inmates with limited reading skills receive staff assistance and equipment to understand the PREA Educational materials.</p>

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This auditor interviewed inspector Flutcher, reviewed his training records and reviewed policy 108.015, it was determined that the investigators do receive Specialized Investigative Training annually. This Specialized training was in addition to the mandatory training requirements for sexual assault investigations. The OIG investigators receive in- service training that specifically relates to sexual assaults within the confinement setting. The receive training on interviewing sexual abuse victims, appropriate application of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for prosecution referral.</p>

115.35	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This auditor interviewed Nursing Supervisor Pfannkuchen about her and medical staff receiving PREA Training. This auditor reviewed the her Training files and learned she received PREA Training. Auditor questioned her about conducting Forensic exams on sexually abuse victims. Nurse Pfannkuchen explained that Forensic exams will be completed by Nurses trained to conduct Forensic exams. She further explained, that Florida Department of Corrections has a contract with Safe Place And Rape Crisis Center, Inc. ( SPARC) to respond to the facility and conduct the examination.</p> <p>The auditor contacted the Rape Crisis Center and spoke with Dr. Scheffield. Dr. Scheffield informed me that her Nurses are trained to conduct Forensic examination and will respond to the facility to conduct examinations.</p> <p>This auditor interviewed Mental Health Specialist Stuthers about PREA Training. MHS Stuthers informed me that he receives PREA Training yearly. This auditor confirmed this information by reviewing his Training records. MHS Stuthers does the sexual screening and counseling for Desota Correctional Institution.</p> <p>The Florida Department of Corrections policy on training medical and mental health staff is outlined in 602.053 pages 7 and 8. Both medical and mental health have received their training.</p>

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor reviewed 602.053 and 601.210, it is determined policies is in place to ensure all inmates are assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates. Inmates arriving at Desoto Correctional Institution are screened within 24- 72 hours of arrival.</p> <p>The auditor interviewed PREA Sergeant and Classification Officers and learned all inmates are screened upon arrival by using the PREA Screening instrument. The information gather will assist security and classification with housing inmates and identifying the abuser.</p> <p>This auditor interviewed approximately 52 inmates all of them confirmed their initial screening, but could not remember being screened the second time within 30 days. I reviewed the inmate information and learned those inmates didn't receive a second assessment.</p> <p>The agency did not meet the intent of this standard. The agency was conducting the second assessment during the inmate's annually classification meeting according to their policy, but the standards requires the second assessment to be conducted within a set time period, not to exceed 30 days from the inmate's arrival at the facility, 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.</p> <p>The auditor was provided documentation that showed inmates receiving an initial screening, and the second screening was conducted within 30 days. The auditor was provided sampling for 30- 60 day period. The auditor was provided with updated policy reading the above. This agency now meets the intent of this standard.</p>

<b>115.42</b>	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>All inmates are screen within 72 hours of arrival to Desoto Correctional Institution. The information from the screening is used to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high of being sexually abusive.</p> <p>During the interviews with staff responsible for screening, and the PREA Compliance Manager, it was confirmed information collected during the risk screening process is reviewed, and assessed with Classification, security, and medical / mental health staff. The information received is used to assist in the determination of housing, bed, work, education, and program assignments.</p> <p>Inmates identified by medical as Transgender or intersex is noted on their Health Screen. Policy requires transgender and intersex inmates to be assessed biannually. The facility will provide transgender and intersex inmates an opportunity to shower separately from other inmates.</p>

<b>115.43</b>	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Inmates placed in Administrative Confinement on Protective status have the same privileges and programs as general population inmates. Segregation housing is used as a last resort. If the inmate is placed in Administrative confinement pending investigation, the abuser will be relocated at another Correctional facility and keep separates are entered into the inmates file.</p> <p>The auditor interviewed several inmates housed in Administrative Confinement for discipline investigations confirmed that they receive the same privileges as the inmates in General Population.</p>

<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The agency has policies (602.053, 602.008) in place for staff and inmates to report sexual abuse or harassment in multiple ways. The inmates can privately report sexual abuse to (Gulf Coast) the tip line. All inmates confirmed by interviews that they could report sexual abuse or harassment in private. During the tour the Tips line number was posted by the phones. During the interviews the inmates were aware they could report sexual abuse or harassment either in person or writing. They were aware of third party reporting procedures.</p> <p>The auditor called and interviewed the Supervisor from Gulf Coast. She confirmed the above information about her agency receiving calls from inmates regarding sexual abuse reporting.</p> <p>This auditor interviewed staff about reporting sexual abuse or harassment in private. Staff confirmed they could report sexual abuse or harassment of an inmate by emailing the PREA Officer, Speaking with the Chain of command, or calling the Inspector Generals office.</p> <p>After the interview with inmates and staff, it was confirmed they have been trained in reporting procedures.</p>

<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This agency has policies and procedures in place to answer and investigate inmate grievances concerning sexual abuse, or harassment allegations. The auditor interviewed the PREA Officer and Coordinator about time limits on sexual abuse grievances, it was confirmed by talking with them, no time limits for grievances on sexual abuse.</p> <p>There were 12 grievances filed concerning sexual abuse or harassment allegations, 4 of the grievances written against staff and 8 were inmate on inmate. All of those grievances were investigated by the Inspector Generals office, and answered.</p> <p>The following policies 33-103.005, 33-103.006, and 602.053 inmate grievance procedures covers sexual abuse.</p>

<b>115.53</b>	<b>Inmate access to outside confidential support services</b>
	<p data-bbox="252 168 901 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 246 526 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 1484 526">The agency has memorandum of understanding with Safe Place and Rape Crisis Center, INC. (SPARCC) to provide counseling to sexually abused inmates. The facility inform inmates prior to giving them access, of the extent to which such communications will be monitored and 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.</p> <p data-bbox="252 582 1412 705">The above information is published in the inmate handbook, and they're reminded during orientation. This information was confirmed by staff, and inmate interviews. This auditor reviewed the inmate handbook and located the above information.</p>

<b>115.54</b>	<b>Third-party reporting</b>
	<p data-bbox="252 902 901 936"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 981 526 1014"><b>Auditor Discussion</b></p> <p data-bbox="252 1059 1428 1182">This agency has developed several methods to receive third party reports of sexual abuse and sexual harassment. Third party reporting is available by Florida Department of Corrections Web, Tips line, grievances, Citizens Complaint forms.</p> <p data-bbox="252 1232 1396 1310">This auditor interviewed the PREA Officer, PREA Coordinator, and Inspector General. A review of the webpage confirmed the above information.</p>

<b>115.61</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor interviewed random staff, contractors, volunteers, and medical staff. All staff members confirmed their obligations to immediately report sexual abuse or harassment of an inmate so an investigation can be initiated and the victim immediately protected against his abuser.</p> <p>The auditor reviewed the policy and determined it did not meet the requirement of this standard 115.61a, because policy 602.053 does not cover reporting of retaliation against inmates and staff who reported an incident of sexual abuse or harassment, or 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>The auditor was provided an updated policy 602.053 covering retaliation against staff and inmates who report sexual abuse &amp; harassment. After reviewing updated policy and speaking with the State PREA Coordinator Judy Cardinez, it was determined this agency now meets the intent of this standard.</p>

<b>115.62</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This agency has a policy and procedures in place to protect inmates from sexual abuse. Interviews conducted with Assistant Warden, PREA Manager, and random sample of staff confirmed upon becoming aware that an inmate is subject to a substantial risk of imminent sexual abuse, each case is evaluated by the Assistant Warden (PREA Coordinator), and the PREA Manager.</p> <p>Inmates may be voluntary or involuntary placed in Administrative Confinement for Protective purposes. Inmate can be placed in Administrative Confinement for 24 hours, while they find suitable housing for the inmate.</p>

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This agency has a policy 602.053 and procedures in place to ensure where upon receiving an allegation that an inmate was sexually abused at another facility, the head of the facility that received the allegation shall notify the head of the facility where the alleged abuse occurred. This notification shall occur within 72 hours.</p> <p>There were no reports received of sexual abuse, while confined at another facility.</p>

<b>115.64</b>	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This auditor reviewed policy 602.053 it clearly specifies procedures to respond to an allegation of sexual abuse for both security and non-security staff. Random staff interviews confirm both security and non-security knew what to do upon learning an inmate was sexually abused to include separating the alleged victim and abuser, how to preserve the crime scene, and what actions inmates should not take in order not to destroy physical evidence.</p> <p>This auditor reviewed training records of certified and non certified staff. The files confirmed staff is trained as First Responders. This auditor reviewed all 8 investigative files of sexual abuse allegations. All cases showed staff separating the victim and securing the crime scene. All victims were escorted to medical for forensic examination.</p>

<b>115.65</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This facility has an plan institutional plan, which outlines what is to take place in response to an incident of sexual abuse among first responders, medical, and mental health practitioners, inspectors, and facility leadership. This auditor interviewed specialized staff and confirmed they were knowledgeable about their individual and collaborative responsibilities.</p> <p>The auditor read and reviewed the plan signed by Warden Murphy. It describes first responders response and responsibilities.</p>

<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<p data-bbox="252 168 901 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 246 526 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 1484 448">All new and renewed contracts are identified as PREA covered contracts are identified as PREA covered contracts when appropriate. These contracts will include the following language to ensure compliance with the National PREA Standards.</p> <p data-bbox="252 492 1428 616">The most current Collective Bargaining Agreement, dated October 2015, does not limit the agency 's ability to remove alleged staff accused of sexual abuse from contact with any inmates pending the outcome of an investigation, and discipline, or termination.</p> <p data-bbox="252 660 1460 828">The auditor reviewed Collective Bargaining Agreement pg. 14, article 7, section 1A, page 17, article 7, section 2G, and FS 110.227 page 1, section 1, pages 2-3, section 5B, and determined the facility can enforce any PREA violations without violating the contract, statue, and PREA Standards.</p>

<b>115.67</b>	<b>Agency protection against retaliation</b>
	<p data-bbox="252 1032 901 1066"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 1111 526 1144"><b>Auditor Discussion</b></p> <p data-bbox="252 1189 1484 1391">The Assistant Warden of Programs is designated to monitor staff retaliation and the PREA Officer monitors inmates for retaliation. Both inmates and staff are monitored up to 90 days or more if needed. PREA Officer Monitoring inmates includes reviewing inmate disciplinary reports, housing or program changes. The Assistant Warden monitor staff for any negative job performances.</p> <p data-bbox="252 1435 1380 1559">All Florida Assist Wardens receive training annually on monitoring inmates and staff for retaliation. All interviewed staff knew who was responsible for monitoring them against retaliation.</p> <p data-bbox="252 1603 1428 1727">This auditor reviewed policy 602.053 it discusses retaliation, and protection for staff and inmates that report sexual abuse, or cooperate during the investigation. This policy clearly protects inmates and staff who report sexual abuse or harassment.</p>

<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The agency has a policy prohibiting the placement of inmates who alleged sexual abuse in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been made that there is no available alternative means of separation from likely abusers. This auditor interviewed the Warden, Assistant Warden, Segregation Supervisor, and some Segregation line staff all indicted compliance with their policy and this standard.</p> <p>This auditor reviewed policy 602.053, and it confirmed that procedures were in place to use Segregated Housing to protect inmates from sexual abuse. The first review happens within 72 hours, and every 14 days afterwards.</p>

<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>All allegations of sexual abuse or sexual harassment are investigated by the Inspector Generals Office. They're trained to conduct criminal and administrative investigations. All investigators for the Office of Inspector General received training on PREA. They received specialized training for investigating sex crimes in a correctional facility.</p> <p>The auditor reviewed 11 PREA cases reported at Desoto Correctional Institution, (10) of those cases alleged sexual abuse, eight (8) of those cases were inmate on inmate, 2 of those cases were staff on inmate, 1 alleged sexual harassment, which was inmate on inmate. Two of those cases alleged staff involvement. Both cases involving staff were unfounded. The other inmate on inmate cases seven were found unsubstantiated, and 2 were unfounded.</p> <p>The auditor interviewed the IG investigator about the investigative process into sexual abuse. He detailed the investigative process to the auditor. The inspector himself will gather and preserve evidence, he will review the video monitoring system for any video evidence showing signs of abuse, he will review the reports and speak with the victim and abuser, and he will try and locate any witnesses. After the gathering of all evidence, documentation and video surveillance, the evidence will be forwarded to the State Attorneys Office for prosecution.</p> <p>The auditor reviewed the following policies 108.003, and 602.053, it was determined procedures were in place for criminal and administrative investigations.</p>

<b>115.72</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor interviewed the IG Investigator and confirmed the agency imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment substantiated.</p> <p>The auditor confirmed the above by reading policy 108.003, reviewing Training files and interviewing the IG investigator.</p>

<b>115.73</b>	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	The inmate is informed of the outcome of the investigation by the PREA Officer, or IG Investigator. The auditor reviewed policies 602.053 and 108.015, it was determined procedures were in place to inform the inmate about the out of the investigation. This also was confirmed by interviewing an inmate that alleged sexual abuse. The inmate confirmed, he was informed about the end results of the investigations by the PREA Officer.

<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The policy supplied to the auditor does not meet the requirements of standard 115.76. Procedure 208.039 does not mention termination as the presumptive sanction for violating the agency zero tolerance policy, the policy does not indicate disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment. The above policy does not detail 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 act was clearly not criminal. It doesn't detail 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 resignations, reported to relevant licensing bodies.</p> <p>The auditor was given an updated policy 602.053 that covered the above concerns. After reviewing the updated policy, it was determined that this agency meets the intent of the standard.</p>

<b>115.77</b>	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor was not provided documentation demonstrating compliance to standard 115.77. Policy 602.053 Prison Rape: (Prevention, Detection, And Response) does not address contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates, or contractor or volunteer who engages in sexual abuse reported to Law enforcement agencies unless it's not criminal, contractor or volunteer who engages in sexual abuse reported to relevant licensing bodies. Policy 602.053 applied to Certified Correctional Officers.</p> <p>The auditor was given an updated policy 602.053 that covered the above concerns. After reviewing the updated policy, it was determined that this agency meets the intent of the standard.</p>

<b>115.78</b>	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor reviewed 33-601.301 and 33-601.314, it was determined policies and procedures were in place to deal with inmates guilty of sexual abuse or harassment. The inmates that report sexual abuse or harassment will not be discipline as long as they made it in good faith. Inmates can be punished if they falsely report an incident of sexual abuse.</p> <p>The auditor reviewed the Inmate's Handbook, it clearly prohibits inmates from engaging in sexual acts whether it's consensual or non-consensual. The auditor interviewed PREA Manager and learned an inmate received disciplinary sanctions for falsely reporting sexual abuse. This inmate admitted it to the IG Inspector, and staff, because he wanted to relocate due to him owing commissary items to another inmate.</p>

<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Inmates answering yes to the SRI assessment or medical assessment about being sexually abused or perpetrated sexually abuse are offered follow up counseling with Mental Health within 14 days of screening. This questionnaire is conducted by classification when the inmate arrives from another facility. That information is secured and only given to staff with a need to know basis.</p> <p>The auditor interviewed two inmates that reported sexual victimization before being incarcerated. Both inmates confirmed that they were seen by Medical and Mental Health. Those inmates were offered additional treatment services free of charge and given the Victim Advocates number.</p> <p>The auditor reviewed policy 602.053 Section 6C-F, pages 12 &amp; 13 and reviewed the SRI Questionnaire sheet, it was determined procedures were in place for inmates to receive treatment for prior victimizations before confinement.</p>

<b>115.82</b>	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor interviewed one inmate that alleged sexual abuse, inmate confirmed during the interview that he received free Medical and Mental Health services. The auditor reviewed 602.053, interviewed Nursing Supervisor, and a Mental Health Supervisor, it was confirmed that inmates sexually abused, while in prison receive free Medical and Mental Health treatment. There is no charge per policy for medical services for PREA related incidents. Medical staff will follow the sexual battery protocol as outlined in DC4-638M Form. A refusal must be signed should the inmate refuse treatment.</p>

<b>115.83</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor interviewed Medical and Mental Health Supervisors. Both of them confirmed ongoing Medical and Mental Health care is provided to sexual abuse victims and abusers who have been victimized by sexual abuse in any prison, jail. The evaluations and treatment of victims includes, follow-up services, treatment plans, and referrals for continued care following their transfer to, other facilities, or their release from custody. The care is provided at no cost for PREA related incidents.</p> <p>The auditor reviewed HSB 15.03.36, and 602.053, it was determined policies and procedures were in place to provide ongoing Medical and Mental Health care for sexual victims and abusers.</p>

<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor interviewed the Assistant Warden of Programs, Chief of Security Classification Supervisor, and the PREA Manager, it was confirmed all incidents of sexual abuse are reviewed by the Sexual Incident Review Team. This team conducts a review of the incident within 30 days. This team will review the investigation file, speak with line staff, and medical / mental health for input. Their findings and recommendations will be forwarded to the Warden. The Warden reviews this information and starts the implementation process of the findings. The report is then forwarded to the Central Office.</p> <p>The auditor reviewed 602.053 Section 12, page 14, and the Sexual Abuse Incident Review Facility Investigation Summary, it was determined policy and procedures were in place to conduct Incident Reviews of PREA / Sexual abuse incidents within 30 days of incident.</p>

<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor reviewed 602.053 Section 7, page 13, it was confirmed a policy was in place to collect yearly data of PREA related incidents for the Department of Justice. The data is collected from the Management Information Notification System (MINS). Every incident of sexual abuse is reported using the MINS reporting system. The data is collected by the Facility PREA Coordinator and sent to the Florida State Wide PREA Coordinator. This facility data is reviewed and forwarded to the Department of Justice for publications.</p> <p>The above information was confirmed through an interview with the Facility PREA Coordinator, State Wide PREA Coordinator.</p>

<b>115.88</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor reviewed 602.053, section 7, page 14, and the 2017 Prison Rape Elimination Act (PREA) Corrective Action Plan, it was determined policy and procedure were in place for the agency at the end of the calendar year, to prepare a corrective action plan to improve the effectiveness of sexual abuse prevention, detention, and response. The corrective action plan will take into consideration all PREA allegations that have been reported. A comparison of the current year data is to be completed.</p> <p>The above information was also confirmed by interviewing the State Wide PREA Coordinator, and Facility Coordinator.</p>

<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor reviewed 602.053, page 14, section 7, 10-12, it was determined policy was in place for the secure data storage, publication, and destruction. This was confirmed by interviewing the State Wide PREA Coordinator, and Facility Coordinator.</p> <p>The department ensures that incident based and aggregate data are securely retained. The departmental policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website. The agency will remove all personal identifiers before making the sexual abuse publicly. The Department maintains sexual abuse data collected following state statute. The up to date survey information is submitted and verified by the PREA Coordinator. In addition to keeping paper documents according to retention schedule a retention folder is located on the computer.</p>

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Desoto Correctional Institution previous PREA Audit was successfully completed November 4, 2014. The previous audit documentation was made available for auditor review as needed. Any documentation that was pertinent to the audit was made available to the auditor. All interviews with staff and inmates were conducted in a private setting, except for the Limited English. The Agency has followed the PREA Standards since the early 2000's.</p>

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The agency places completed audit reports on the agency website as required by the standard. It has provided these documents since 2014 and continued to post them within 2 weeks of the documents being provided to them by the auditor.</p>

## Appendix: Provision Findings

### 115.11 (a) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment? yes

Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment? yes

### 115.11 (b) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

Has the agency employed or designated an agency-wide PREA Coordinator? yes

Is the PREA Coordinator position in the upper-level of the agency hierarchy? yes

Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities? yes

### 115.11 (c) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.) 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 OR the response to 115.12(a)-1 is "NO".) yes

**115.13 (a) Supervision and monitoring**

Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse? yes

Does the agency ensure that each facility has documented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse? yes

Does the agency ensure that each facility's staffing plan takes into consideration the generally accepted detention and correctional practices in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration any judicial findings of inadequacy in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from Federal investigative agencies in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from internal or external oversight bodies in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration all components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated) in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration the composition of the inmate population in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into yes

consideration the number and placement of supervisory staff in calculating adequate staffing levels and determining the need for video monitoring?

Does the agency ensure that each facility's staffing plan takes into consideration the institution programs occurring on a particular shift in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration any applicable State or local laws, regulations, or standards in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration the prevalence of substantiated and unsubstantiated incidents of sexual abuse in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration any other relevant factors in calculating adequate staffing levels and determining the need for video monitoring ? yes

**115.13 (b) Supervision and monitoring**

In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.) 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 in non-exigent circumstances? (N/A here for facilities with less than 50 inmates before August 20,2017.) yes

Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A here for facilities with less than 50 inmates before August 20,2017.) na

**115.15 (c) Limits to cross-gender viewing and searches**

Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches? yes

Does the facility document all cross-gender pat-down searches of female inmates? yes

**115.15 (d) Limits to cross-gender viewing and searches**

Does the facility implement a policy and practice that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks? yes

Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit? yes

**115.15 (e) Limits to cross-gender viewing and searches**

Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status? yes

If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner? yes

**115.15 (f) Limits to cross-gender viewing and searches**

Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? yes

Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? yes

**115.16 (a) Inmates with disabilities and inmates who are limited English proficient**

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

Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all

aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?

Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities? yes

Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities? yes

Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities? yes

Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.) yes

Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing? yes

Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary? yes

Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have intellectual disabilities? yes

Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills? yes

Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision? yes

**115.16 (b) Inmates with disabilities and inmates who are limited English proficient**

Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?      yes

Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?      yes

**115.16 (c) Inmates with disabilities and inmates who are limited English proficient**

Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?      yes

**115.17 (a) Hiring and promotion decisions**

Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? yes

Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? yes

Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above? yes

Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? yes

Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? yes

Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above? yes

**115.17 (b) Hiring and promotion decisions**

Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates? yes

**115.17 (c) Hiring and promotion decisions**

Before hiring new employees who may have contact with inmates, does the agency: perform a criminal background records check? yes

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

**115.17 (d) Hiring and promotion decisions**

Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates? yes

**115.17 (e) Hiring and promotion decisions**

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

**115.17 (f) Hiring and promotion decisions**

Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions? yes

Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees? yes

Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct? yes

**115.17 (g) Hiring and promotion decisions**

Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination? yes

**115.17 (h) Hiring and promotion decisions**

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

**115.18 (a) Upgrades to facilities and technologies**

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

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

**115.21 (c) Evidence protocol and forensic medical examinations**

Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate? yes

Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible? yes

If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)? yes

Has the agency documented its efforts to provide SAFEs or SANEs? yes

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

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

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

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

<b>115.22 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
<b>115.22 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
<b>115.22 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If a separate entity is responsible for conducting criminal investigations, does such publication describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes

**115.31 (a) Employee training**

Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment? yes

Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures? yes

Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment? yes

Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment? yes

Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement? yes

Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims? yes

Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse? yes

Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates? yes

Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates? yes

Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities? yes

<b>115.31 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
<b>115.31 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
<b>115.31 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.32 (a)</b>	<b>Volunteer and contractor training</b>	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
<b>115.32 (b)</b>	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes

<b>115.32 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
<b>115.33 (a)</b>	<b>Inmate education</b>	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
<b>115.33 (b)</b>	<b>Inmate education</b>	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
<b>115.33 (c)</b>	<b>Inmate education</b>	
	Have all inmates received such education?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes

**115.33 (d) Inmate education**

Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient? yes

Does the agency provide inmate education in formats accessible to all inmates including those who are deaf? yes

Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired? yes

Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled? yes

Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills? yes

**115.33 (e) Inmate education**

Does the agency maintain documentation of inmate participation in these education sessions? yes

**115.33 (f) Inmate education**

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

**115.34 (a) Specialized training: Investigations**

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

**115.34 (b) Specialized training: Investigations**

Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) yes

Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) yes

Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) yes

Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) yes

**115.34 (c) Specialized training: Investigations**

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

**115.35 (a) Specialized training: Medical and mental health care**

Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? yes

Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? yes

Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? yes

Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? yes

<b>115.35 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams.)	na
<b>115.35 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere?	yes
<b>115.35 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31?	yes
	Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.32?	yes
<b>115.41 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
<b>115.41 (b)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes

**115.41 (c) Screening for risk of victimization and abusiveness**

Are all PREA screening assessments conducted using an objective screening instrument? yes

**115.41 (d) Screening for risk of victimization and abusiveness**

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

<b>115.41 (e)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: history of prior institutional violence or sexual abuse?	yes
 <b>115.41 (f)</b>	 <b>Screening for risk of victimization and abusiveness</b>	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes
 <b>115.41 (g)</b>	 <b>Screening for risk of victimization and abusiveness</b>	
	Does the facility reassess an inmate's risk level when warranted due to a: Referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Request?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
 <b>115.41 (h)</b>	 <b>Screening for risk of victimization and abusiveness</b>	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes

**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

<b>115.42 (c)</b>	<b>Use of screening information</b>	<p>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)?</p> <p>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?</p>	<p>yes</p> <p>yes</p>
<b>115.42 (d)</b>	<b>Use of screening information</b>	<p>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?</p>	<p>yes</p>
<b>115.42 (e)</b>	<b>Use of screening information</b>	<p>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?</p>	<p>yes</p>
<b>115.42 (f)</b>	<b>Use of screening information</b>	<p>Are transgender and intersex inmates given the opportunity to shower separately from other inmates?</p>	<p>yes</p>

**115.42 (g) Use of screening information**

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

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

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

**115.43 (a) Protective Custody**

Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers? yes

If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment? yes

**115.43 (b) Protective Custody**

Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible? yes

Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible? yes

Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible? yes

Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible? yes

If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The opportunities that have been limited? yes

If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The duration of the limitation? yes

If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The reasons for such limitations? yes

**115.43 (c) Protective Custody**

Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged? yes

Does such an assignment not ordinarily exceed a period of 30 days? yes

**115.43 (d) Protective Custody**

If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety? yes

If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged? yes

<b>115.43 (e)</b>	<b>Protective Custody</b>	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
<b>115.51 (a)</b>	<b>Inmate reporting</b>	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
		Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
		Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
<b>115.51 (b)</b>	<b>Inmate reporting</b>	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
		Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
		Does that private entity or office allow the inmate to remain anonymous upon request?	yes
		Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security?	no

<b>115.51 (c)</b>	<b>Inmate reporting</b>	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
 <b>115.51 (d)</b>	 <b>Inmate reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
 <b>115.52 (a)</b>	 <b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
 <b>115.52 (b)</b>	 <b>Exhaustion of administrative remedies</b>	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes

**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? yes

Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible? yes

**115.53 (b) Inmate access to outside confidential support services**

Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws? yes

**115.53 (c) Inmate access to outside confidential support services**

Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse? yes

Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements? yes

**115.54 (a) Third-party reporting**

Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment? yes

Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate? yes

**115.61 (a) Staff and agency reporting duties**

Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency? yes

Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment? yes

Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation? yes

**115.61 (b) Staff and agency reporting duties**

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

**115.61 (c) Staff and agency reporting duties**

Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section? yes

Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services? yes

**115.61 (d) Staff and agency reporting duties**

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

<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
<b>115.62 (a)</b>	<b>Agency protection duties</b>	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
<b>115.63 (b)</b>	<b>Reporting to other confinement facilities</b>	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.63 (c)</b>	<b>Reporting to other confinement facilities</b>	Does the agency document that it has provided such notification?	yes
<b>115.63 (d)</b>	<b>Reporting to other confinement facilities</b>	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes

**115.64 (a) Staff first responder duties**

Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser? yes

Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence? yes

Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? yes

Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? yes

**115.64 (b) Staff first responder duties**

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

**115.65 (a) Coordinated response**

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

**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

<b>115.67 (e)</b>	<b>Agency protection against retaliation</b>	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
<b>115.68 (a)</b>	<b>Post-allegation protective custody</b>	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
<b>115.71 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
<b>115.71 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
<b>115.71 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes

- 115.71 (d) Criminal and administrative agency investigations**
- When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution? yes
- 115.71 (e) Criminal and administrative agency investigations**
- Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff? yes
- Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding? yes
- 115.71 (f) Criminal and administrative agency investigations**
- Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse? yes
- Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings? yes
- 115.71 (g) Criminal and administrative agency investigations**
- Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible? yes
- 115.71 (h) Criminal and administrative agency investigations**
- Are all substantiated allegations of conduct that appears to be criminal referred for prosecution? yes

- 115.71 (i) Criminal and administrative agency investigations**
- Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years? yes
- 115.71 (j) Criminal and administrative agency investigations**
- Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation? yes
- 115.71 (l) Criminal and administrative agency investigations**
- When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).) na
- 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.) na

**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

<b>115.73 (e)</b>	<b>Reporting to inmates</b>	Does the agency document all such notifications or attempted notifications?	yes
<b>115.76 (a)</b>	<b>Disciplinary sanctions for staff</b>	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.76 (b)</b>	<b>Disciplinary sanctions for staff</b>	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
<b>115.76 (c)</b>	<b>Disciplinary sanctions for staff</b>	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
<b>115.76 (d)</b>	<b>Disciplinary sanctions for staff</b>	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
		Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes

<b>115.77 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
 <b>115.77 (b)</b>	 <b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
 <b>115.78 (a)</b>	 <b>Disciplinary sanctions for inmates</b>	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
 <b>115.78 (b)</b>	 <b>Disciplinary sanctions for inmates</b>	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
 <b>115.78 (c)</b>	 <b>Disciplinary sanctions for inmates</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes

- 115.78 (d) Disciplinary sanctions for inmates**
- If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits? yes
- 115.78 (e) Disciplinary sanctions for inmates**
- Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact? yes
- 115.78 (f) Disciplinary sanctions for inmates**
- For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation? yes
- 115.78 (g) Disciplinary sanctions for inmates**
- Does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.) yes
- 115.81 (a) Medical and mental health screenings; history of sexual abuse**
- If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? yes

**115.81 (b) Medical and mental health screenings; history of sexual abuse**

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

yes

**115.81 (c) Medical and mental health screenings; history of sexual abuse**

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

yes

**115.81 (d) Medical and mental health screenings; history of sexual abuse**

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

yes

**115.81 (e) Medical and mental health screenings; history of sexual abuse**

Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?

yes

**115.82 (a) Access to emergency medical and mental health services**

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

yes

**115.82 (b) Access to emergency medical and mental health services**

If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62? yes

Do security staff first responders immediately notify the appropriate medical and mental health practitioners? yes

**115.82 (c) Access to emergency medical and mental health services**

Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate? yes

**115.82 (d) Access to emergency medical and mental health services**

Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident? yes

**115.83 (a) Ongoing medical and mental health care for sexual abuse victims and abusers**

Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility? yes

**115.83 (b) Ongoing medical and mental health care for sexual abuse victims and abusers**

Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody? yes



**115.83 (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

<b>115.86 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.86 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
<b>115.87 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
<b>115.87 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes

<b>115.87 (c)</b>	<b>Data collection</b>	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
<b>115.87 (d)</b>	<b>Data collection</b>	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.87 (e)</b>	<b>Data collection</b>	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
<b>115.87 (f)</b>	<b>Data collection</b>	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
<b>115.88 (a)</b>	<b>Data review for corrective action</b>	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
		Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
		Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes

<b>115.88 (b)</b>	<b>Data review for corrective action</b>	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
<b>115.88 (c)</b>	<b>Data review for corrective action</b>	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
<b>115.88 (d)</b>	<b>Data review for corrective action</b>	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
<b>115.89 (a)</b>	<b>Data storage, publication, and destruction</b>	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
<b>115.89 (b)</b>	<b>Data storage, publication, and destruction</b>	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
<b>115.89 (c)</b>	<b>Data storage, publication, and destruction</b>	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes

**115.89 (d) Data storage, publication, and destruction**

Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise? yes

**115.401 (a) Frequency and scope of audits**

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

**115.401 (b) Frequency and scope of audits**

During each one-year period starting on August 20, 2013, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited? yes

**115.401 (h) Frequency and scope of audits**

Did the auditor have access to, and the ability to observe, all areas of the audited facility? yes

**115.401 (i) Frequency and scope of audits**

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

**115.401 (m) Frequency and scope of audits**

Was the auditor permitted to conduct private interviews with inmates, residents, and detainees? yes

**115.401 (n) Frequency and scope of audits**

Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel? yes

**115.403 (f) Audit contents and findings**

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