

PREA Facility Audit Report: Final

Name of Facility: Eastern Correctional Institution (NC)

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 07/25/2021

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Robert Manville	Date of Signature: 07/25/2021

AUDITOR INFORMATION	
Auditor name:	Manville, Robert
Email:	robertmanville9@gmail.com
Start Date of On-Site Audit:	05/03/2021
End Date of On-Site Audit:	05/05/2021

FACILITY INFORMATION	
Facility name:	Eastern Correctional Institution (NC)
Facility physical address:	2821 NC-903, Maury, North Carolina - 28554
Facility Phone:	
Facility mailing address:	P.O. Box 215, Maury, North Carolina - 28554

Primary Contact	
Name:	Michael Hardee
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Telephone Number:	252-653-5754

Warden/Jail Administrator/Sheriff/Director	
Name:	Mike Hardee
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Facility PREA Compliance Manager	
Name:	Robert Civils
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Facility Health Service Administrator On-site	
Name:	Danny Morris
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Telephone Number:	252-653-5975

Facility Characteristics	
Designed facility capacity:	476
Current population of facility:	436
Average daily population for the past 12 months:	422
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Males
Age range of population:	22-76
Facility security levels/inmate custody levels:	close
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	286
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	11
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	43

AGENCY INFORMATION	
Name of agency:	North Carolina Department of Public Safety
Governing authority or parent agency (if applicable):	
Physical Address:	512 North Salisbury Street, Raleigh, North Carolina - 27604
Mailing Address:	
Telephone number:	919-733-2126

Agency Chief Executive Officer Information:	
Name:	
Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information			
Name:	Charlotte Jordan-Williams	Email Address:	charlotte.williams@ncdps.gov

AUDIT FINDINGS

Narrative:

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

The North Carolina Department of Public Safety entered contract for the Prison Rape Elimination Act (PREA) auditing services with the DX Consultants, LLC. The primary sole auditor is Robert Manville, and no conflict of interest exists between the two parties. The contract explained the efforts toward transparency, the role of third parties and support staff, compliance considerations regarding the PREA Standards, Department of Justice certification requirements, enough time to conduct the audit, and planning for any corrective action phases.

The agency and contracting staff determined that the agency would utilize the online audit system (OAS). The On-line Audit System is a secure software platform that will prevent the transfer of personally identifiable information and provide the user to have the ability to upload documents, retain the documentation for future use, and record the auditing process throughout all three important phases. The auditor received notification all information was being uploaded to the OAS system that included the preaudit questionnaire and this tool is utilized by the auditor to determine the facility information, policies, agency organization chart, contracts, staffing plans, written justifications for deviations within the staffing plan, PREA reviews, staff rounds, population reports, searches, cross-gender viewing incidents, training curriculums, training logs, special needs documentation, hiring and promotion considerations, evidence protocols, medical treatment obligations, intake screening instruments, Offender grievances, investigation reports, and data collection.

Prior to the on-site visit, the facility staff uploaded agency and institution policies and supporting documentation, including the completed Pre-Audit Questionnaire, administrative reports, contracts, incident reports, memorandums, brochures, staff rosters, staffing plans, training information, and other reference materials for examination. Policies and documentation are in the form of agency directives and policies. Institution Supplements (IS) are provided in the form of Facility Directives. Updates of the Pre audit questionnaire, investigations and Institutional Supplements were also discussed prior to the beginning of the audit.

The auditor reviewed the agency website for PREA reports and updated policies. The auditor reviewed the December 2016 PREA Audit Report posted on the Agency website and notated all previously recommended corrective action responses. The website included data collection reports from 2015 through 2019 and the auditor noted all statistical data throughout the review. A search of any litigations, facility information was also reviewed on a Google Search. There were no litigations or negative posting found in the Google Posting. The facility was originally a male facility. In 2014 it was converted to a female facility. During the conversions additional cameras and mirrors were added to the facility. Also during the conversion restroom were modified to provide additional privacy for the female population. A staffing plan was updated an additional staff were added to the facility. In 2018 the facility was converted back to a close security male facility. While some modifications were made to the restrooms, the cameras, mirrors and staffing remained in place.

The on-site visit for the Prison Rape Elimination Act (PREA) audit of the Eastern Correctional Institution was conducted by certified auditor Robert Manville from May 3 through May 5, 2021. Notices of the upcoming audit and the Auditor's contact information were posted throughout the institution on March 18, 2021. This is the third PREA audit for this facility. Upon arrival at the facility, an in-briefing meeting was held with the Warden, several department heads and support staff, facility PREA compliance manager. The standards used for this audit became effective August 20, 2012.

The tour of Eastern Correctional Institution included the intake processing areas, all housing units, the special housing unit, the health services department, recreation, food service, facility support areas, education, visiting rooms and programming areas. During the tours, it was noted that there was sufficient staffing to ensure a safe environment for offenders and staff. Signs were posted (in English and Spanish) that indicated employees of the opposite gender were present in the housing units. Offenders can shower, dress, and use the toilet without exposing themselves to employees of the opposite gender.

Postings and the agency's zero-tolerance policy toward sexual abuse and sexual harassment were in some housing units, meeting areas and throughout the facility. Audit notice postings with the PREA auditor's contact information were in the same areas. The Postings were Sporadic Staff indicated they would update the postings.

The auditor received five correspondences from offenders and no correspondence from staff. Three of the offenders were still at the facility and were interviewed by the auditor.

Some of the housing units had a copy of the PREA policy and related phone numbers for reporting allegations of sexual abuse or sexual harassment including the telephone number for the Victim Advocate in a posted PREA policy. The "Hotline" was a 800 number and was not accessible to the offenders. The PREA compliance manager, and a PREA Support staff also attempted to call the number. From past audits the auditor was aware of the system having a number phone system that can be utilized by the offenders to contact the Rape Crisis Center. (The auditor called the number from his personal phone after the first day tour and was able to contact the Forgiving Ministries). The agency has a 962 number that offender may call without utilizing their PIN to contact the Forgiving Mininistries. The informaiton was not

provided during the PREA audit or noted in most of the dormitories. The information in most dormitories were the agency PREA policy. Staff were advised this would be a Corrective Action Plan and without the ability for offender to utilize the telephone system policies would have to be rewritten and the center would be able to complete the audit, but the audit would be an interim report until this problem was rectified. The Regional PREA Analyst provided the necessary information to the facility and the facility updated Posters as part of the Corrective Action Plan. Posters were placed throughout the facility during the correction action plan.

The staff interviews consisted of 41 total interviews that were selected from shift rosters, specialized staff rosters, and staff identified during Offender interviews: 16 random staff interviews, 4 informal staff interviews, segregated housing Sgt. incident review team staff, first responder staff security, 4 non security first responder, 3 Intermediate staff (Shift Supervisors), 2 staff that screens for victimization and abusiveness, PREA Compliance Manager, intake staff, investigative staff, Facility Warden, human resource staff, staff designated to monitor retaliation, program volunteer coordinator, Victim Advocate, Medical Staff, and Mental Health Staff. The auditor spoke with a representative of Vidant Medical Center who verified on call SANE staff.

Offender random interviewed offenders included offenders housed in every dormitory in each program. The below offenders were determined to be a target population:

Transgender 0

Allegation of Sexual Abuse 1

Allegation of Sexual Harassment 2

Victimization 3

Gay 2

Segregation for PREA 0

Disabled 1

Deaf 0

Cognitive 3

LEP 0

Random Offenders 22

Total Population 427

Total Interviews 34

Overall, all offenders interviewed demonstrated a good understanding of the PREA compliance program, the intake screening process, the prevention and protection process and reporting mechanisms. The offenders further stated that staff members were responsive to their needs and that they felt safe at the facility.

Staff File Review:

The auditor requested random personnel background checks and reviewed 15 employee training records two contractor files. The employee records included five staff that had been employed at the facility more than 5 years, five of the staff were promoted and five of the staff were employed in the last 12 months. Background checks are conducted by the facility human resources director. All information was provided and current as required by the PREA standards.

Staff Training Records Review

The auditor requested some specific and some random training files for employees. Including in the specific list was training staff, director, PCM, shift supervisor and eight random monitors. All training records provided included initial PREA training, yearly updated training and specialized training for medical and mental health staff.

Offender File Review

Fifteen files were requested for review. The agency has a offender file data base (OPUS) and information requested is located on this data base. This includes offender signature to verify training. The offenders' files included Date of Arrival, Date of Screening for victimization, date of initial orientation and date of comprehensive training. The files did not contain rescreening. The agency was aware of this problem and published a corrective action plan to the facility and all correctional facilities during the onsite audit. reviewed. All other time requirements were met in each area.

Investigations

During the audit period, there were 85 allegations of sexual abuse or sexual harassment. A total of 8 all the allegations were for sexual abuse. Five of the allegations of sexual abuse were transported to the medical center for Forensic Examination. Six of the allegations were determined unsubstantiated and two were unfounded. Six of the allegations were investigated by local law enforcement for criminal action and referred back to the facility for administrative investigations after local law enforcement determined the allegation were unsubstantiated and would not be prosecuted. The investigations was determined unsubstantiated. The auditor reviewed 34 investigative files. The investigations were completed by trained Sexual Abuse in Confinement investigator.

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.

Eastern Correctional Institution sits on land in Maury, NC and houses a maximum of 477 inmates. There are approximately 286 staff to accommodate the daily operations. The institution has 11 contractors and 43 volunteers. There is camera coverage to help supplement supervision of staff. The construction of the building is tilt slab or concrete block walls and air conditioning. Five housing units are located within the facility. All housing units are single cell. Four of the housing units are designed with 24 beds in 5 dormitories with day room, television, wet cells. Showers, located in the housing units, have privacy screens/half walls. This facility has a significant number of cameras which is unusual for this level of custody. Also, to mitigate blind spots the facility has installed mirrors. Mirrors have been placed in areas enabling staff to see around corners. Showers also had half walls and an angled partition to restrict viewing. Phones were in each living unit. PREA Posters Including how to report allegation of sexual abuse or sexual harassment were placed throughout the facility as part of the corrective action plan. One of the housing unit contains two 24 single cell dormitories that houses the segregation unit. Two of the dormitories are dry cells and houses inmates in protective custody status. Inmates are transferred to this facility for placement in protective custody.

The Receiving/Discharge area has an intake area for orientation and initial intake. Upon arriving at the facility inmates are individually taken to an office for strip search and to be issued clothing. There is a partition for inmate's privacy during this search. Only residents of the same gender conduct these searches. There are other offices located this area which allow private interviews to be conducted. There were zero-tolerance posters displayed in the intake area.

The Health Services Department contains treatment rooms and offices. There is a bulletin board that contains PREA information located in the waiting area. There are correctional officers assigned to the health care area, whenever inmates are in this area. The health unit is always operational 16 hours a day with on call staff on duty.

There are recreation areas located on this compound. These recreational areas include a gymnasium, activity center, exercise equipment, hobby craft rooms, music rooms and an outside recreation area. Zero-tolerance posters are located throughout the recreation area. The bathroom areas in each of the recreational areas include partitions and doors to provide privacy. There were PREA information boards in each of the recreational areas.

The Education area contains classrooms and support services. The Education department provides various programs for the inmates, including:

- High School Diploma Program
- Adult Continuing Education (ACE)
- Advanced Occupational Education
- English as a Second Language
- Release Readiness Program
- Law Library
- Leisure Library

The Religious Services Department consists of a chapel area, group rooms, music area and offices. There were PREA posters located in the religious services hallway and in the front entrance area. There were no blind spots noted in this area.

The Food Service Department has a large dining room with a food service preparation area attached. Except for the staff dining room, all areas of food service are under constant surveillance with cameras, mirrors, or staff supervision. There are "zero-tolerance posters" in all food service areas. At the present time meals are being served in the living units.

The Laundry is supervised by correctional staff and employs inmate workers. The laundry is under continuous supervision and is monitored by cameras and mirrors. There were no blind spots noted in the laundry. The laundry area had a bulletin board with PREA information including zero-tolerance and PREA audit notices.

AUDIT FINDINGS

Summary of Audit Findings:

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

Number of standards exceeded:	0
Number of standards met:	45
Number of standards not met:	0

The facility had to complete a corrective action plan for the following standards

115.41 (f)

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.

The agency was aware of noncompliance with 115.41 and had proactively instituted a corrective action plan that was received during the onsite audit.

115.51 (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?

Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?

The Regional PREA Program Analysis was made aware of 115.51 during the out briefing. The facility did not have any information for reporting allegation of sexual abuse or sexual harassment by the "hotline" that bypasses the use of the inmate's serial number and telephone pin number. The facility was provided the posting information during the out briefing, laminated the information, and placed the information throughout the facility. The telephone was checked and it was verified that the information provided to the facility was accurate. The facility has placed the laminated documents in all living unit and in the intake area. Staff have notified this information to offenders when they arrive at the facility. A corrective action plan was instituted to allow the facility 45 days to get all of the information updated and provided to offenders.

Based on the completion of the corrective action plans, the facility meets the applicable standards.

Standards

Auditor Overall Determination Definitions

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

Auditor Discussion Instructions

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 651 300">POLICY AND DOCUMENT REVIEWED:</p> <ol data-bbox="242 329 1415 757" style="list-style-type: none"> 1. ECI Pre-Audit Questionnaire responses 2. Agency Prison Policy 3400, Offender Sexual Abuse and Sexual Harassment 3. Reviewed the Agency Website, https://www.ncdps.gov, Organizational Chart. 4. Agency Prison Policy 3405, Procedures, page 5 5. Agency Prison Policy 3403, Definitions, pages 1-4 6. Agency Prison Policy 3405, Section H, Disciplinary Sanctions, pages 29-31 7. Agency Prison Policy 3400, General Provisions, pages 10-16 8. Office of PREA Administration, NC Department of Public Safety Designation of PREA Compliance Manager Memo. <p data-bbox="242 819 1484 1081">North Carolina Department of Public Safety (NCDPS) issued agency Policy series 3400 to promulgate agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. The policy outlines procedures and expectations related to NCDPS approach to preventing, detecting, and responding to sexual abuse and sexual harassment. The agency implement further Prison Policy and procedures to include procedures, definitions, disciplinary sanctions, and general provision. These policies includes definitions of prohibited behaviors regarding sexual assault and sexual harassment for staff and inmates. Theses polices also reenforce the agency's zero tolerance against sexual abuse is clearly established and the policy outlines the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment allegations.</p> <p data-bbox="242 1088 1484 1149">Inmates who are found to have perpetrated sexual abuse or sexual harassment are disciplined in accordance with sanctions outlined in the facility's inmate pamphlet..</p> <p data-bbox="242 1211 1460 1308">Staff members who are found to have perpetrated sexual abuse or sexual harassment are disciplined in accordance with Employee Discipline policy and Facility Rule of Conduct and subject to employment termination. Employees are subject to criminal prosecution.</p> <p data-bbox="242 1314 1484 1608">NCDPS memorandum, agency and a facility organizational chart meet the requirements of this standard. The agency's zero tolerance against sexual abuse is clearly established and the policy outlines the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment allegations. The agency memorandum establishes a position of PREA compliance manager with the responsibility to oversee the implementation and management of Prison Rape Elimination Act of 2003. Eastern Correctional Institution warden issued a memorandum to establish a PREA compliance manager to coordinate and to oversee the implementation and management of the Prison Rape Elimination Act of 2003. The agency also has identified staff to assist the PREA coordinator regionally in implementing and monitoring facilities. The facility warden has also designed three staff that serve as PREA Support Personnel (PSP) at Eastern Corrections Institution (ECI).</p> <p data-bbox="242 1639 1484 1832">Inmates are informed orally about the zero-tolerance policy and the PREA program during in-processing and additional admission and orientation presentations. The orientation is offered in English and in Spanish. Additional program information is contained in the A&O Pamphlet, and postings distributed throughout the facility (observed during the tour). All written documents are available in English and Spanish. Additional interpretive services are available for inmates who do not speak or read English. Both institution staff and inmates are provided with a wealth of opportunities to become aware of PREA policies and procedures.</p> <p data-bbox="242 1863 1484 1960">All employees receive initial training and annual training, as well as updates throughout the year. The institution meets the standards based on all the programs they have implemented to ensure the inmates and staff understand its position on zero-tolerance.</p>

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>POLICY AND DOCUMENT REVIEWED:</p> <p>NCDPS Website</p> <p>The agency and facility meet the mandates of this standard. ECI does not contract with other entities for the confinement of Offenders. Compliance was determined by review of PREA coordinator and agency head designee interviews.</p>

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>ECI Pre-Audit Questionnaire responses</p> <p>Facility Staffing Analysis ECI Report, June 2020.</p> <p>Policy F 1600, Chapter F, Management of Security Posts</p> <p>North Carolina General Statue (NCGS) Policy 143B-709, Security Staffing,</p> <p>Facility Logbook entries</p> <p>Staffing Plan re: Adequate Levels of Staffing</p> <p>Security Roster & Activity Log re: Supervisor Rounds & Staffing Deviations (All Shifts)</p> <p>ECI - Annual Reviews & Audits</p> <p>Copies of officers' logbooks showing unannounced rounds by supervisors on all shifts</p> <p>NCGS Policy 143B-709, Security Staffing, mandates that the facility will complete a staffing plan prior to opening a facility and will continue to review a minimum of once a year utilizing the following criteria.</p> <ul style="list-style-type: none"> - Generally accepted detention and correctional practices. - Judicial findings of inadequacy. - Findings of inadequacy from Federal investigative agencies. - Findings of inadequacy from internal or external oversight bodies. - All components of the facility's physical plant. - The composition of the offender population. - The number and placement of supervisory staff. - Institution programs occurring on a particular shift. - Applicable State or local laws, regulations, or standards. - The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and - Other relevant factors. <p>Interviews with the Warden and executive staff revealed compliance with the PREA, and that other safety and security issues are always a primary focus when they consider and reviewing their respective staffing plans. The facility has a Staffing Report that is developed for each pay period. The Warden meets weekly with his executive staff with operational needs including addressing staffing issues as they relate to the PREA. The latest Warden review of the staffing plan was completed on June 20, 2020.</p> <p>The institution has been provided with all necessary resources to support the programs and procedures to ensure compliance with the PREA standards. The audit included an examination of all video monitoring systems; staff interviews; and rosters. Supervisory and Administrative staff members routinely make unannounced rounds covering all shifts and these rounds are documented. PREA rounds are documented in operations lieutenants' logs and at the officer's stations logs for housing units.</p> <p>There have been no judicial findings of inadequacy from federal investigative agencies or findings of inadequacy from internal or external oversight bodies relevant to this standard. All essential posts are filled each shift and no essential posts are kept open for salary savings. When programs are offered, staffing is increased to provide additional supervision. The review of unannounced PREA rounds logs confirmed that intermediate-level or higher-level supervisors, including shift supervisors and department heads, conduct and document such visits throughout the institution, during the day, at night and on the weekends. Staff members are prohibited from alerting other employees regarding unannounced rounds. Interviews</p>

with offenders and housing unit officers also confirmed that random, unannounced rounds are conducted by Institution management and line officer supervisors daily, including nights and weekends. PREA rounds are documented in operations logs and at the officer's stations logs for housing units. An examination of policy and supporting documentation and all interviews confirms compliance with this standard. Compliance was determined by staff interviews conducted during the tour of all areas of the facility, including human resource manager and correctional staff; reviews of documented staffing rosters, daily supervisory checks, and facility workforce quarterly meeting records; pay period staffing reports and the examination of the video monitoring system. A comprehensive tour of the facility was conducted during the audit that included looking for blind spots, reviewing cameras coverage and available staff in areas that offenders are assigned. A camera review was conducted by looking at each camera from a control area by the auditor. The annual Staffing plan was reviewed by the Warden, PREA compliance manager and PREA coordinator. Subsequently, tours of each area of the facility was also reviewed while going throughout the facility to meet with staff and to interview offenders.

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The facility does not house Youthful offenders. Compliance was determined by review of the PAQ, random screening instrument reviews and interviews with PREA Coordinator, PREA compliance Manager and Warden.

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>POLICY AND DOCUMENT REVIEWED:</p> <p>ECF Responses to the Pre-Audit Questionnaire</p> <p>Policy F.1600 Management of Security Post</p> <p>Policy .100, Chapter F, Operational Searches, 08-12-19, pages 1-6</p> <p>Cross Gender Notification Poster, (Spanish and English)</p> <p>Cross Gender Acknowledgement Signature and Witness Statement</p> <p>“Safe Search Practices”, Training Lesson Plan</p> <p>Policy .0700, Chapter A, Operational Searches, North Carolina Department of Public Safety Prison Policy F. 0100 Operational Searches and Policy F.1600 Management of Security Post establishes the governance of searches at the facility. The policy requires all strip searches be conducted by staff of the same gender except in exigent circumstances and then with the approval of the OIC. Males will pat search only males and female staff may pat search males. Gender specific staff will conduct all strip searches with the exception of exigent and documented exigent circumstances and with the approval of the OIC. Any strip search by an opposite gender staff will be forwarded to the Department’s OPUS Incident reporting system. There have been no strip searches conducted by non-gender specific staff at Eastern Correctional Institution during the last several years. The facility does not house female inmates. Management of Security Post mandates that the facility review gender specific assignment needs for correctional staff assigned to Transport Officers, Search Team Officers, Visiting Room Search Officer, Intake Officer, Sally Port, and Specialized Treatment Units will be considerate of gender specific posts. The facility has shower partitioned off from view of staff. The partition allows for staff to observe the head and feet levels of each inmate while block view of the mid-section. All staff members are trained on gender specific guidelines. This training includes that all inmates are allowed to shower, perform bodily functions, and change clothing without staff of the opposite gender viewing their buttocks or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Policy addresses requirements that staff of the opposite gender announce their presence when entering an inmate housing unit. There are posters located in the day room, officers’ stations, and other areas throughout the facility that state staff must announce their presence in entering an area of the facility that houses the gender different from the staff member. Part of the training for initial and then yearly training also confirmed that staff are trained on the mandate that all staff of the opposite gender must announce their presence when entering a housing unit. North Carolina Department of Public Safety has issued a statement that is located in all the officers’ stations and on bulletin boards that includes all areas of the requirements for cross gender viewing and searches by facilities. Prior to taking over, the oncoming shift announce that a female is working the building and then female staff announces their presence again when they enter the living area. Staff were observed making announcement prior to shift changes and when female staff entered any housing units.</p> <p>Verification of the requirements was documented in the training logs, during interviews with staff and inmates and during tours throughout the facility. NCDPS Policy F.1600 mandates staff will receive training and will comply with policy and that staff do not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate’s genital status. Interviews with inmates confirmed that they had been pat-searched by officers properly and professionally. Staff training records, and staff interviews verified that they had received training which includes who may be searched and the professional manner to complete searches. Female officers may pat search male residents, visitors, or other staff. The female officer that pat searched the auditor did it in a professional and appropriate manner. Based on reviews and interviews with the female staff, the facility does not require prior approval for pat searches of males by female staff.</p>

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Policy 2600, Chapter E, Reasonable Accommodations for Offenders with Disabilities</p> <p>NCDPS Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p>NCDPS Prison Policy 1800, Chapter E, Non-English-Speaking Offender Program,</p> <p>TTY Phones</p> <p>Signs and posters indicating zero tolerance posted throughout the facility English/Spanish formats Written materials in multiple language formats</p> <p>NCDPS Prison policy F .3400 Offender Sexual Abuse and Sexual Harassment, NCDPS Prison policy E .1800, Non-English Speaking Inmate Program and Prison policy E .2600 Reasonable Accommodations for Inmates with Disabilities addresses all requirements of the standard. Through Prison policy and practice, the facility ensures that inmates with all disabilities listed in §115.16 (a) have an equal opportunity to participate in and benefit from all aspects of the agency's efforts to prevent, detect and respond to sexual abuse and sexual harassment. Facility Prison policy F.3400 as well as Eastern Correctional Institution training curriculum address implementation of Agency Mandates. All PREA related information, including postings, brochures and handouts are available in English and Spanish languages. Staff also may read information to inmates when necessary. Translation services are available through a contracted language service for inmates who are not English proficient for any language. TTY telephones and Tablets are available for hard of hearing inmates. Interviewed with medical staff and case manager discussed the process to ensure inmates can understand all requirements of PREA standards. Case manager interviews each inmate and considers responses to determine their ability to understand the PREA orientation program. Medical conducts interviews with inmates during the intake process. Any medical observation that identifies inmate's disabilities is shared with case manager, program director and mental health staff. Three inmates that were determined to be cognitive dysfunction were interview. East indicated they are interviewed by their case manager and mental health provider on a regular basis and overall knew all training provided inmates. They did not know about the Victim Advocate but stated that they would seek out their mental health staff if anyone tried to sexual assault them or if they saw someone being sexually assaulted. Communication services are available for inmates who use sign language. The facility does not rely on inmate interpreters, inmate readers or other types of inmate assistants in the performance of first responder duties or during the investigation of an inmate's allegations. Interviews with first responders, medical, mental health and investigative staff confirmed their awareness of the prohibition of using inmate interpreters for PREA compliance functions. Interviews with staff and an examination of Policy and supporting documentation also confirmed compliance with this standard.</p>

115.17	Hiring and promotion decisions
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 654 300">POLICY AND DOCUMENT REVIEWED:</p> <p data-bbox="242 329 595 358">Pre-Audit Questionnaire responses</p> <p data-bbox="242 387 1031 416">Administrative Memorandum 10-2013, PREA Hiring and Promotion Prohibition,</p> <p data-bbox="242 445 544 474">Random Staff Personnel Files</p> <p data-bbox="242 504 1176 533">Addendum to Administrative Memorandum 10-2013, PREA Hiring and Promotion Prohibitions</p> <p data-bbox="242 562 711 591">Disqualifying Factors – Misdemeanor Offenses</p> <p data-bbox="242 620 1015 649">NC Department of Public Safety, HR008 Professional Reference Check Form</p> <p data-bbox="242 678 488 707">Random Volunteer Files</p> <p data-bbox="242 736 496 766">Random Contractor Files</p> <p data-bbox="242 795 775 824">NCDPS, HR 013 DPS Employment Statements Form</p> <p data-bbox="242 853 1123 882">NC Department of Public Safety, Employment with the Department of Public Safety form</p> <p data-bbox="242 911 667 940">CDPS, HR005 Applicant Verification Form</p> <p data-bbox="242 969 639 999">Five Random Staff Background Checks</p> <p data-bbox="242 1028 652 1057">Five Promoted Staff Background Checks</p> <p data-bbox="242 1086 652 1115">Five Promoted Staff Background Checks</p> <p data-bbox="242 1144 1474 1294">The agency provided several documents that validate Prison policy for all areas of this standard. These include New Hiring Prohibitions, Promotion Prohibitions, New Employee Hiring Prison policy, Hiring Process Manual, External Web Employee with DPS and several memos forwarded to the facility staff. Each of these documents require Pre-employment background checks, a minimum of background checks within five (5) years of initial employment and background checks for all promotions prior to being offered a promotion.</p> <p data-bbox="242 1323 1394 1386">Fifteen (15) personnel files were examined by the Auditor to ensure compliance with all aspects of this standard. All employees who have contact with inmates have had a full field background.</p> <p data-bbox="242 1415 1493 1610">Contractors and volunteers who have regular contact with inmates also have criminal background checks completed prior to having contact with inmates. Volunteer and contractor background checks are repeated yearly. A review of the volunteers and contractor's file provided update background checks. The facility does not hire or promote anyone who may have contact with offenders, and does not enlist the services of any contractor who may have contact with inmates who has engaged in any type of sexual abuse or sexual harassment (no exceptions). Employees have a duty to disclose such misconduct and material omissions regarding such misconduct may be grounds for termination.</p> <p data-bbox="242 1639 1490 1935">Submission of false information by any applicant is grounds for not hiring the applicant. The Administrative Services Manager was interviewed and confirmed that the agency attempts to contact prior employers for information on substantiated allegations of sexual abuse or resignations which occurred during a pending investigation of sexual abuse. The Administrative Services Manager also confirmed the agency provides 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. Policy provides that the facility notify appropriate licensing/certifying agencies when professional staff members are terminated for substantiated allegations of sexual abuse or sexual harassment. A review of personnel and volunteer/contractor files and relevant supporting documentation, including interview with administrative services manager and volunteer/contractor coordinator confirm compliance with this standard.</p>

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>NCDPS Prison Policy 1600, Chapter F, Management of Security Posts</p> <p>The agency policy 1600, Management of Security Posts indicates when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect Offenders from sexual abuse. The facility Warden confirmed no substantial expansions were performed to the facility within the last 12 months. The interview with the Warden indicated the safety and privacy needs for Offenders is always considered. Whenever analysis is performed the idea of creating areas of safety and eliminating blind spots are important. There have been no new cameras installed in the last 12 months.</p> <p>The facility has implemented a policy and a program to monitor the effects of upgrades, camera placement, and video monitoring equipment throughout their facility. Each camera has a full DVR recording support, and all modern additions were provided to assist in preventing, detecting, and responding to sexual abuse and sexual harassment allegations. The efforts provided by the facility meets the requirements of this standard. The Warden advised the PREA Coordinator participates in the discussions regarding video monitoring equipment and future expansion.</p> <p>Compliance was determined by present camera configurations throughout the facility, A review of the cameras and video equipment and interviews with Warden and PREA coordinator.</p>

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>ECI Responses to the Pre-Audit Questionnaire</p> <p>Agency Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment</p> <p>NCDPS Memorandum to Local Law Enforcement Agencies and Sheriff's</p> <p>Form OPA-I20, Incident Scene Tracking Log</p> <p>CP 18 - Clinical Practice Guidelines, Sexual Abuse</p> <p>North Carolina General Statute (NCGS) 143B-1200, Part 1, Assistance Program for Victims of Rape and Sex Offenses</p> <p>NCDPS, PREA Support Person Role and Responsibilities Document</p> <p>NCDPS, Form OPA-A18, Designation of PREA Support Person Memo</p> <p>PREA Support Person Training</p> <p>MOU with REAL Crisis Intervention Inc.</p> <p>Nzorrth Carolina Department of Public Safety (NCDPS) prison policy Chapter F .3400 Offender Sexual Abuse and Sexual Harassment establishes the requirements for first responders, investigators, and medical staff to secure the crime scene including the areas of the offense, the victim, and alleged abuser for the preservation of usable evidence. The Prison policy mandates that persons responsible for investigating allegations of sexual abuse follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecution.</p> <p>Interviews with investigators confirmed that Investigators are trained and follow appropriate curriculum for a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecution. North Carolina Public Safety Health Services Prison policy and CP 18 References that this Prison policy and procedure is based on Department of Justice "National Protocol for Sexual Assault Medical Forensic Examination, Adults / Adolescents. ECI utilizes the agency investigators for conducting administrative sexual abuse and sexual harassment investigations, and Greene County Sheriff has the responsibility for conducting criminal abuse investigations. This was confirmed during the PREA Compliance Manager, Investigative staff interviews, and 10 informal staff interviews. The facility has developed and trained staff on a Coordinated Response Plan. The facility also has trained all PREA Support Person roles and responsibilities to assist in coordinated responses of sexual abuse. The facility uses the services at Valiant Health Medical Center that always maintains a Sexual Assault Nurse Examiner on call. The facility also has a Memorandum of Understanding with REAL Crisis Intervention Inc. Based on the MOU and interview with the Center representative, the Center provides a person to accompany the victim during the forensic examination. Further, REAL Crisis Intervention Inc. also provides emotional support, crisis intervention, information, and referrals. Offenders can contact the Rape Crisis Center by dialing *63 on the inmate phone system. The facility has a part-time Licensed Psychologist that also provides support. Based on interviews with Center director all staff members providing services for the Center have educational and training qualification to provide the services as indicated in the MOU which mandates that the Center provide a certified rape crisis advocate to provide services as part of the response to a sexual abuse victim. The PREA Compliance Manager verified the facility will always utilize Real Crisis Interventions advocates to offer emotional support, crisis intervention, information, and referrals. ECI has PREA support staff to utilize as representatives for the emotional support services. These staff are selected by Administration as the PREA Support Person (PSP). They received 7 hours of dedicated on-line training efforts to ensure proper placement, empathic responses, and documentation efforts. There were four forensic examinations performed by a qualified SANE nurse. One offender refused service at the hospital. The staff indicated they would provide the necessary support. The Health Services Administrator confirmed all medical procedures will be performed to the victim at no cost and the auditor reviewed data to support the 4 SANE evaluations were performed at no cost to the Offenders.</p> <p>ECI also provides on-site mental health treatment through their crisis stabilization and transitional care units. This includes activities groups, social skills training, group therapy, and medication management groups. All investigation were determined to be unsubstantiated. The investigator interviewed indicated that all the Sexual Abuse Investigations were conducted by local sheriff's office, and all were determined to be unsubstantiated. One offender that had gone for a SANE evaluation stated there were staff available when he arrived at the hospital, but he declined their services. He was provided phone numbers to call and a pamphlet from the staff at the hospital but declined. His investigation was unsubstantiated by local law enforcement. Compliance was determined by review of investigative reports, interviews with offender that claimed sexual</p>

abuse, interviews with medical staff, deputy sheriff, victim advocate staff. PREA support staff and PREA compliance Managers.

115.22	Policies to ensure referrals of allegations for investigations
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 651 300">POLICY AND DOCUMENT REVIEWED:</p> <p data-bbox="242 329 711 358">ECI Responses to the Pre-Audit Questionnaire</p> <p data-bbox="242 387 1123 416">Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment</p> <p data-bbox="242 445 965 474">NCDPS Memorandum to Local Law Enforcement Agencies and Sheriff's</p> <p data-bbox="242 504 687 533">Form OPA-I20, Incident Scene Tracking Log</p> <p data-bbox="242 562 861 591">Policy-18, Section: Clinical Practice Guidelines, Sexual Abuse</p> <p data-bbox="242 620 1088 649">Policy 143B-1200, Part 1, Assistance Program for Victims of Rape and Sex Offenses</p> <p data-bbox="242 678 928 707">NCDPS, PREA Support Person Role and Responsibilities Document</p> <p data-bbox="242 736 946 766">NCDPS, Form OPA-A18, Designation of PREA Support Person Memo</p> <p data-bbox="242 795 531 824">PREA Support Staff Training</p> <p data-bbox="242 853 638 882">MOU with REAL Crisis Intervention Inc.</p> <p data-bbox="242 911 1485 1066">The facility has investigators that have completed investigator training offered by North Carolina Department of Public Safety. The investigators' training is provided by the Department of Public Safety. The facility investigators also work with Greene Sheriff Department to provide any information requested by the Sheriff's Department investigators. The investigations staff interviewed indicated they meet on a regular basis to discuss investigations and involve the Sheriff's Department in informal training with facility investigators.</p> <p data-bbox="242 1095 1485 1249">Administrative investigations are conducted for all allegations of sexual abuse or sexual harassment and criminal investigations will be conducted upon referral. Allegations involving staff shall be reported to the Office of Special Investigations in accordance with the DPS-SI100 OSI Authority to Conduct Investigations policy. Unit facility investigators will ensure that all cases are completed and documented with complete investigative summaries and the Warden is informed of the outcomes.</p> <p data-bbox="242 1279 1414 1346">The Pre-Audit Questionnaire listed 87 allegations of sexual abuse and sexual harassment in the past 12 months. This resulted in 74 administrative investigations and 8 allegations referred for criminal investigation.</p> <p data-bbox="242 1375 1477 1507">The PREA investigation shall be completed and decided upon (approved) by the Region Director within 30 days of the initial PREA report. An extension of an additional 30 day maximum may be given by the Region Director in instances where the investigation requires additional time for the collection of evidence or determination of validity. Any PREA investigation that extends beyond the 60 maximum days must have prior approval by the Director of Prisons.</p> <p data-bbox="242 1536 1477 1668">This auditor reviewed 34 investigative reports and determined a documented credibility assessment within the investigative software. The considerations for credibility were discussed throughout the investigative staff interviews and documented within the reports. The facility investigative staff interview indicated the burden of proof for administrative investigations to be the preponderance of the evidence.</p> <p data-bbox="242 1697 1453 1890">NCDPS Prison NCDPS Prison Policy F .3400 Inmate Sexual Abuse and Sexual Harassment mandates that facilities will immediately open a preliminary investigation when any allegation may meet the level of a PREA violation. ECI assigns an Investigator immediately when information is reported or discovered. This was confirmed in review of all incidents both preliminary and incidents determined to be PREA allegations with the PREA Compliance Manager. ECI has a MOU with Greene Sheriff Department to conduct criminal investigations. The agency publishes the State Law, on its website, which indicates that criminal offenses will be prosecuted.</p> <p data-bbox="242 1919 1485 2013">Compliance was determined by review of the allegation of sexual abuse or sexual harassment, review of investigation files, computer tracking system and interviews with Investigators, PREA compliance managers and Warden. Compliance was also determined by review of NCDPS website.</p>

115.31	Employee training
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 651 300">POLICY AND DOCUMENT REVIEWED:</p> <p data-bbox="242 329 596 358">Pre-Audit Questionnaire responses</p> <p data-bbox="242 387 1182 416">Agency Prison policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy</p> <p data-bbox="242 445 900 474">PREA: Sexual Abuse and Sexual Harassment (101), Lesson Plan</p> <p data-bbox="242 504 900 533">PREA: Sexual Abuse and Sexual Harassment (201), Lesson Plan</p> <p data-bbox="242 562 638 591">PREA of 2003 Acknowledgement Form</p> <p data-bbox="242 620 555 649">PREA Employee Training Quiz</p> <p data-bbox="242 678 571 707">Reviewed 12 Staff Training Files</p> <p data-bbox="242 736 1485 896">North Carolina Department of Public Safety (NCDPS) Prison policy F.3400 Inmate Sexual Abuse and Sexual Harassment addresses the requirements of the standard. The facility's training addresses all of the topics identified in the standard. Along with the Staff and Offender Relations Training, new staff receive New Employee Orientation related education, and all staff receive annually during refresher training. The review of lesson plans, training logs, and PREA power point presentations confirmed that the provided training also addresses all elements identified in the standard.</p> <p data-bbox="242 925 1485 1151">The auditor reviewed the PREA Course Lesson Plan that lists the following performance objectives required within the training: The agency's zero-tolerance policy for sexual abuse and sexual harassment, staff responsibilities for prevention, detection, response, and reporting procedures, Offender rights to be free from sexual abuse and sexual harassment, Offender and staff retaliation standards, the dynamics of sexual abuse in confinement settings, victim behaviors, signs and symptoms of threatening behaviors, how to avoid inappropriate relationships, communication and understanding the linguistic, ethnic, or cultural differences, and how to report sexual abuse to outside authorities. Included in the training is how to conduct a cross gender pat search and policies related to such a search.</p> <p data-bbox="242 1180 1485 1344">Employees have PREA information noted on posters available to them and located throughout the facility. They are provided a PREA Brochure developed by the NCDPS PREA office and all carry a PREA reference card. Staff annual training files were reviewed and contained documentation supporting compliance with this standard. All staff interviewed indicated they received the required PREA training initially and annually. The PREA Compliance Manager and Superintendent have periodically issued memos (e-mails) to staff reminding them of and clarifying various PREA issues.</p> <p data-bbox="242 1373 1485 1635">The agency maintains a Learning Management System for employees, and it maintains all staff records. In order to show completion of the training, staff must first receive the training and pass a test. Staff members are required to use their personal information to enter the course and indicate they have received and meet the minimum test requirements. The extensive training provided and staff knowledge of PREA requirements confirmed that the facility is compliant with this standard. All staff members interviewed were aware of all aspects of the training and each interviewed indicated they had received training in the previous year. All staff members attended Basic Training Class when they are employed by NCDPS and yearly thereafter staff receive annual PREA training. Interviews with staff, PREA compliance manager, training staff and warden along with training records confirmed compliance with this standard.</p>

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency prison policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy</p> <p>PREA: Sexual Abuse and Sexual Harassment (101), Lesson Plan</p> <p>PREA: Sexual Abuse and Sexual Harassment (201), Lesson Plan</p> <p>PREA of 2003 Acknowledgement Form</p> <p>PREA Employee Training Quiz</p> <p>Reviewed of 6 Volunteer/ Contractor training files</p> <p>North Carolina Department of Public Safety (NCDPS) Prison policy F.3400 Offender Sexual Abuse and Sexual Harassment addresses the requirements of the standard. The facility's training addresses all of the topics identified in the standard. Each contractor and volunteer must complete an application and a background check is completed. The application consists of the following information: personal information, current employment information, personal identification information, education, emergency contacts, criminal history, and previous institutional experience. Each volunteer and contractor are screened through the North Carolina Crime Information Network and the National Crime Information Center. All volunteers and contractors complete a screening process, and a badge identification system is conducted that authorizes the volunteer or contractor access to the facility.</p> <p>The Program Director is responsible for the overall management of the facility's volunteers and contractors' program. Volunteers are managed in accordance with agency Prison policy F.0604, Community Volunteer Program. A program supervisor conducts training and background checks for all volunteers and contractors. Volunteers, including one time visitors, and contractors receive PREA training and undergo a yearly background check prior to being allowed into the facility or supervise inmates. The facility presently has 40 volunteers. NCDPS has provided a poster that is located in the visitation room and a smaller copy is given to volunteers that provides PREA information and ways to report sexual abuse and sexual harassment.</p> <p>A review of the PREA training rosters signed by contract staff, a review of the volunteer and contractor training sponsored by facility and the Programs Supervisor's volunteer files and interviews with program supervisor and program director confirmed all information required to document training. All background checks are maintained in the administrative offices and were reviewed and found up to date. All volunteer or contract staff receive copies of a PREA updates. These updates were noted in the file and were verified through an interview with Volunteer Coordinator.</p>

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency policy 3400, Chapter F,</p> <p>Offender Sexual Abuse and Sexual Harassment Policy</p> <p>NCDPS, Offender PREA Education Acknowledgement Form</p> <p>OPUS Online, Educational Program Search Screen</p> <p>Transfer Orientation Email Notification</p> <p>Sexual Abuse Awareness for the Offender Intake Brochure</p> <p>Diagnostic Center Procedures, Orientation Procedures, Section 201</p> <p>Statewide Term Contract 961B – Telephone Based Interpreter Services, Linguistic International, Inc.</p> <p>Observed the Intake Process and Issue of the PREA Pamphlet to Offenders</p> <p>During in-processing procedures, each inmate receives training on PREA and each inmate is provided a pamphlet describing the agency's PREA compliance program. The information identifies the key elements of the program and informs them of the zero-tolerance Prison policy regarding sexual abuse and sexual harassment and multiple ways to report sexual abuse or sexual harassment. The information also informs the inmates they will be free from retaliation for reporting an incident and that both male and female staff members routinely work in and monitor the housing units. The information is available in English and Spanish languages. Inmate education is documented in inmate records and inmates are asked to sign a statement that they received the training.</p> <p>A staff member conducts an education program regarding the PREA for all inmates upon arrival at the facility within 30 days of their arrival at the facility. The usual procedure is for case managers to report to the intake area during the arrival of inmates. At that time the inmate receive a pamphlet describing PREA, the inmate handbook and a comprehensive training program. However, if inmate arrive late or if this training would be completed within 4 days of arrival of the inmates. In those cases, the inmate receives the pamphlet and have an orientation to includes rights to be free from sexual abuse, how to report allegations of sexual abuse and the agency zero tolerance of sexual abuse. The inmate sign this document during the initial orientation. The PREA education program includes definitions of sexually abusive behavior and sexual harassment, prevention strategies and reporting modalities. Inmates also view a comprehensive orientation video that explains the facilities zero-tolerance Prison policy and covers the inmate's right to be free from sexual abuse, sexual harassment and retaliation. Telephonic translation services are available to inmates who are not proficient in English or are otherwise unable to communicate (deaf, blind, mentally impaired etc.) Inmate education is documented in inmate records and inmates are asked to sign a statement that they received the training</p>

115.34	<p>Specialized training: Investigations</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy</p> <p>PREA: Specialized Investigations: Sexual Abuse and Sexual Harassment Lesson Plan</p> <p>Training Progress Summary Pie Chart, PREA Sexual Abuse and Sexual Harassment Investigator's Workshop</p> <p>PREA First Responder Cards</p> <p>The agency provided several documents that validate Prison policy for all areas of this standard. Presently there are 11 trained investigative staff at ECI. NCDPS Prison policy F .3400, Offender Sexual Abuse and Sexual Harassment, addresses this standard. The ECI investigators have received training relevant to PREA. An investigator was interviewed and was able to explain in detail the process and procedures required during a PREA-related investigation.</p> <p>The investigator interview indicated additional training is conducted on a continuous basis. This training provides the necessary elements required within this standard to include the following: interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action and prosecution referral. The auditor reviewed the training outline and power points associated with this learning environment. This training identified the PREA standards that apply to investigating sexual abuse of Offenders and demonstrated six critical investigative techniques and protocols of competent investigations. The facility maintains records of all training received and is easily accessible for review. Agency policy 3400 indicates training documentation will be maintained by the employee training files and documented on the PREA Training and Understanding Form. The auditor reviewed 11 PREA Training and Understanding Forms for the 11 staff members that have taken the specialized investigator training class.</p> <p>A review of the investigators training files and relevant supporting documentation, including interview with investigator and PREA compliance manager confirm compliance with this standard.</p>
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115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy</p> <p>Medical Staff Training Files</p> <p>PREA Training and Understanding Verification Form</p> <p>Training Progress Summary Pie Chart, PREA Sexual Abuse and Sexual Harassment Medical and Mental Health Response</p> <p>Sexual Abuse and Sexual Harassment Medical and Mental Health Response Power Point, Health Services Policy</p> <p>Specialized Training Policy CP-18</p> <p>NCDPS Prison policy F .3400 Offender Sexual Abuse and Sexual Harassment mandates health services training. All medical and mentalhealth care persons receive specialized training through the Office of Health Services. All staff have received training in Sexual Abuse and Sexual Harassment as mandated. A review of the training files indicated they have all received training within the last 12 months. . Additionally mental health staff and other staff received Support Services Training for persons used to continue monitoring persons who have been identified as having a history of sexual abuse or victims of sexual abuse or sexual harassment.</p> <p>Based on the review of the following evidence: agency policy governing training of medical and mental health care practitioners, documentation showing the training has been received by all staff, a review of the training curriculum, signature indicating understanding of the training received, and confirmation of the medical staff training logs ensuring the staff have received the initial training for employees, contractors, and volunteers dependent upon their status, the auditor finds the facility meets all of the provisions required within this standard with substantial compliance.</p>

115.41	Screening for risk of victimization and abusiveness
	<p data-bbox="240 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 273 651 300">POLICY AND DOCUMENT REVIEWED:</p> <p data-bbox="240 331 596 358">Pre-Audit Questionnaire responses</p> <p data-bbox="240 389 1177 416">Agency Prson Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy</p> <p data-bbox="240 448 952 474">NCDPS, Risk to Sexual Victimization and Abusiveness Screening Guid</p> <p data-bbox="240 506 1136 533">NCDPS, Mental Health Screening Inventory, Offender Population Unified System (OPUS)</p> <p data-bbox="240 564 927 591">NCDPS, Screening for risk of Sexual Victimization and Abusiveness:</p> <p data-bbox="240 622 791 649">PREA Standards 115.41 and 115.42 Guidelines Memo</p> <p data-bbox="240 680 655 707">NCPDS, Diagnostic Policy Update Memo</p> <p data-bbox="240 739 580 766">Screening Inventory Update 2021</p> <p data-bbox="240 797 507 824">Screening Staff Interviews</p> <p data-bbox="240 855 754 882">PREA Screening Factsheet OPA-S010 04-27-2021</p> <p data-bbox="240 913 671 940">PREA Memorandum3 Risk Reassessment</p> <p data-bbox="240 972 1493 1160">NCDPS Prison policy F .3400 Offender Sexual Abuse and Sexual Harassment addresses all components of this standard for screening new and transferring inmates. The initial screening of inmates is conducted during their intake into the Department's Diagnostic Centers. The agency has developed a Facility Procedural Manual for all new intakes into the system. The Manual requires that within three days diagnostic staff will administer the Mental Health Screening Inventory and Screening for Risk of Victimization and Abusiveness to all newly admitted inmates. Results of the screening will be entered into the Offender Population Unified System (OPUS) system.</p> <p data-bbox="240 1191 1493 1518">All diagnostic records are confidential and only available on a need to know basis. A review of the screening instrument contains all requirements identified in the standard. The system is pass word protected for need to know staff. When transferred to another facility, the inmate receives a screening by the Case Manager or Counselor within the first 72 hours of the inmate's arrival, but this activity ordinarily occurs within a few hours on the first day of arrival to the facility. The review of screening documents by the Auditor confirmed that inmates identified as high risk for sexual victimization or at risk of sexually abusing other inmates were referred to a mental health professional and all received further assessment (15 intake files were examined by the Auditor). Staff also reviews records or other information and information from other facilities. The facility was not reviewing or rescreening offenders within the first 30 days of admission. A Corrective Action was required. The agency has issued Policy updates, memorandum for risk reassessment and Screening Fact Sheet. The updates includes training for staff and satisfies the requirement of this standard.</p> <p data-bbox="240 1550 1493 1841">The staff psychologist reviews and conducts additional screening on inmates. The facility screening instrument provides that the facility will review and/or reassess the intake screening within 30 days of the inmate arriving at the facility based on additional information or inmate behavior. This information is maintained in the computerized inmate files, the computerized system sends reminder within 25 days after the inmate arrived at the facility. The program director and program supervisor interviewed confirmed that the screening instrument can be recompleted based on inmate behavior or receiving additional information. OPUS contains all information in computerized inmate files. Information received during the screening process is confidential and only available to staff with a need-to-know and never to other inmates. Staff and inmate interviews, a review of Prison policy/documentation (including screening documents and inmate tracking system) and observations of the intake process confirmed compliance with this standard.</p>

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 210 451 237">Auditor Discussion</p> <p data-bbox="242 271 651 297">POLICY AND DOCUMENT REVIEWED:</p> <p data-bbox="242 329 596 356">Pre-Audit Questionnaire responses</p> <p data-bbox="242 387 1171 414">Agency Prion Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy</p> <p data-bbox="242 445 1481 472">NCDPS, Screening for risk of Sexual Victimization and Abusiveness: PREA Standards 115.41 and 115.42 Guidelines Memo</p> <p data-bbox="242 504 655 530">NCPDS, Diagnostic Policy Update Memo</p> <p data-bbox="242 562 587 589">Screening Inventory Update 2021</p> <p data-bbox="242 620 507 647">Screening Staff Interviews</p> <p data-bbox="242 678 754 705">PREA Screening Factsheet OPA-S010 04-27-2021</p> <p data-bbox="242 736 659 763">PREA Memorandum Risk Reassessment</p> <p data-bbox="242 795 1437 848">Health Services Policy and Procedures Manual, TXI-13, Care and Treatment of Patient, Education, and Management of Disorders of Gender Dysphoria</p> <p data-bbox="242 880 1493 1072">NCDPS Prison policy F. 3400 Offender Sexual Abuse and Sexual Harassment addresses all components of this standard for screening new and transferring inmates. The initial screening of inmates is conducted during their intake into the Department's Diagnostic Centers. The agency has developed a Facility Procedural Manual for all new intakes into the system. The Manual requires that within three days diagnostic staff will administer the Mental Health Screening Inventory and Screening for Risk of Victimization and Abusiveness to all newly admitted inmates. Results of the screening will be entered into the Offender Population Unified System (OPUS) system.</p> <p data-bbox="242 1104 1493 1364">All diagnostic records are confidential and only available on a need to know basis. A review of the screening instrument contains all requirements identified in the standard. The system is password protected for need to know staff. When transferred to another facility, the inmate receives a screening review by the Case Manager or Counselor within the first 72 hours of the inmate's arrival, but this activity ordinarily occurs within a few hours on the first day of arrival to the facility. The review of screening documents by the Auditor confirmed that Offender identified as high risk for sexual victimization or at risk of sexually abusing other inmates were referred to a mental health professional and all received further assessment of 12 intake files were examined by the Auditor. Staff also reviews records or other information and information from other facilities.</p> <p data-bbox="242 1395 1481 1691">The staff psychologist reviews and conducts additional screening on inmates. The facility screening instrument provides that the facility will review and/or reassess the intake screening within 30 days of the inmate arriving at the facility based on additional information or inmate behavior. This information is maintained in the computerized inmate files, the computerized system sends reminder within 25 days after the inmate arrived at the facility. The program director and program supervisor interviewed confirmed that the screening instrument can be recompleted based on inmate behavior or receiving additional information. OPUS contains all information in computerized inmate files. Information received during the screening process is confidential and only available to staff with a need to-know and never to other inmates. Staff and inmate interviews, a review of Prison policy/documentation (including screening documents and inmate tracking system) and observations of the intake process confirmed compliance with this standard.</p> <p data-bbox="242 1722 1449 1776">The facility operates a classification committee that reviews inmate's behavior, risk, and mental health status in assigning jobs and housing. Inmates may be reassigned based on any of these variables in order to maintain the inmate's safety.</p> <p data-bbox="242 1807 1465 2040">The agency has no dedicated facilities for transgender or intersex inmates. The facility determines other housing and programming assignments for transgender or intersex inmates on a case-by-case basis, to include whether a placement would ensure the inmate's health and safety and whether the placement would present management or security problems. Placement and programming assignments for each transgender or intersex inmate are reassessed at least once every six months. Policy states that a transgender or intersex inmate's own views, with respect to their own safety, are given serious consideration when making these assignments. Policy also mandates that transgender and intersex inmates are given the opportunity to shower, dress and use toilet facilities separately from other inmates.</p> <p data-bbox="242 2072 1458 2159">The facility shower areas are modified to establish privacy from staff of the opposite gender. Inmates are also allowed to dress and complete bodily functions without being in view of persons of the opposite gender. The facilities showers and restrooms are partitioned however would not provide the privacy required by inmates identified as transgender or intersex.</p>

The facility does have a plan that would be implemented to allow transgender or intersex inmates privacy to shower and dress.

Compliance of the standard was verified through review of policies, interviews with PREA Compliance Manager, Case Managers, Superintendent, and psychologist, correctional staff, inmates and tour of the facility.

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Prsion Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy</p> <p>NCDPS, Screening for risk of Sexual Victimization and Abusiveness: PREA Standards 115.41 and 115.42 Guidelines Memo</p> <p>NCPDS, Diagnostic Policy Update Memo</p> <p>Screening Inventory Update 2021</p> <p>Screening Staff Interviews</p> <p>PREA Screening Factsheet OPA-S010 04-27-2021</p> <p>PREA Memorandum3 Risk Reassessment</p> <p>Health Services Policy and Procedures Manual, TXI-13, Care and Treatment of Patient, Education, and Management of Disorders of Gender Dysphoria</p> <p>Agency policy 3400, Chapter F, pages 15-16 clearly define the information within this standard. Offenders at high risk of sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and there are no other alternative means of separation. The Offender will not be held for more than 24 hours to complete the assessment. Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document: the opportunities that have been limited, the duration of the limitation; and the reasons for such limitations.</p> <p>The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days.</p> <p>The facility reported no Offenders that have been housed in segregation for high risk of sexual victimization in the past 12 months. Offenders at high risk for sexual victimization cannot be placed in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been made that there is no available alternative means of separation from likely abusers. The status of all Offenders placed in protective custody pursuant to risk of sexual victimization is reviewed by the Warden/designee every thirty (30) days.</p> <p>Compliance of the standard was verified through review of policies, interviews with PREA Compliance Manager, Sgt. Supervisor of segregation unit, Case Managers, Warden, and psychologist, correctional staff, offenders and tour of the facility.</p>

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 210 451 237">Auditor Discussion</p> <p data-bbox="242 271 651 297">POLICY AND DOCUMENT REVIEWED:</p> <p data-bbox="242 329 596 356">Pre-Audit Questionnaire responses</p> <p data-bbox="242 387 1182 414">Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy</p> <p data-bbox="242 445 868 472">Memorandum of Understanding, REAL Crisis Intervention INC.</p> <p data-bbox="242 504 539 530">MOA with Forgiven Ministries</p> <p data-bbox="242 562 1066 589">PREA Reporting Poster, Help Prevent Prison Sexual Violence (Posted after audit)</p> <p data-bbox="242 620 852 647">NCDPS, Sexual Abuse Awareness for the Offender Brochure</p> <p data-bbox="242 678 711 705">Offender Handbook, Rules and Policies DC-23</p> <p data-bbox="242 736 957 763">NCDPS, Maintaining an Atmosphere of Professionalism, Staff Brochure</p> <p data-bbox="242 795 1484 1117">NCDPS Prison policy F.3400, Inmate Sexual Abuse and Sexual Harassment, addresses this standard as well as NCDPS Prison policy D.0300 Inmate Use of Mail. Sexual abuse and sexual harassment can be reported in writing, anonymously, privately, and from a third party. Staff documents all allegations. Staff members are trained to immediately report and document any sexual abuse or sexual harassment allegation. There are posters and other documents on display throughout the facility that also explain reporting methods. The facility provides a posting explaining at least one way for inmates to report sexual abuse or sexual harassment to an entity that is not part of the agency. NCDPS has developed a Memorandum of Understanding (MOU) with Forgiven Ministries to receive and immediately forward inmate reports of sexual abuse or sexual harassment to agency officials. The purpose of this MOU is to allow inmates to contact NCDPS through a third-party. Offenders may contact Forgiven Ministries by dial a 972 phone number. The inmate is not required to utilize a PIN to make these calls.</p> <p data-bbox="242 1149 1484 1243">Staff members are encouraged to report anonymously through the Office of Fraud, Waste, and abuse. Additionally, NCDPS provides staff with a brochure that provides multiple ways for staff to report allegations of sexual abuse or sexual harassment.</p> <p data-bbox="242 1274 1422 1332">The system for contacting the Forgiven Ministries for offender to make reports of allegations of sexual abuse or sexual harassment was sporadically posted in the facility.</p> <p data-bbox="242 1364 1493 1458">The auditor advised the facility that this would require them to enter a Corrective Action Plan update the information brochures for the Forgiven ministries reporting process without utilizing an inmate Pin. Further the facility should post all PREA related information in all dormitories.</p> <p data-bbox="242 1489 1489 1615">Staff members are encouraged to report anonymously through the Office of Fraud, Waste, and abuse. Additionally, NCDPS provides staff with a brochure that provides multiple ways for staff to report allegations of sexual abuse or sexual harassment. Interviews with staff and inmates; observations of posters addressing reporting methods; and an examination of Policies, documentation, and the MOU confirm compliance with this standard.</p> <p data-bbox="242 1646 1484 1771">Based on implementing a corrective action plan during the close out the facility is in compliance with this standard and documentation that the posters had been placed in all areas of the facility and this information is being provided to offenders when they arrive at the facility the facility is in compliance with this standard. I talked to the facility and they are making sure that this is now part of their training programs for offenders.</p> <p data-bbox="242 1803 1489 1964">This information was shared with the PREA compliance manager, and the institution immediately began developing laminated copies of the Poster and placing them in each dormitory near the telephone. The Warden was not available for the close out due to medical. The facility entered a corrective action plan to update all information regarding reporting and advise offenders of the reporting system. However, to comply with this standard it was determined that the interim report would be implemented for the 45 day period and the final report would be submitted after the 45 days implementation period.</p> <p data-bbox="242 1995 1484 2121">The facility is providing this information as part of the facility offender training program, has Posted the information in each living unit and the telephone number was verified and is operational. in compliance with this standard. Documentation that the posters had been placed in all areas of the facility and this information is being provided to offenders when they arrive at the facility. Based on implementing a corrective action plan the facility is in compliance with this standard.</p>

Interviews with staff and inmates; observations of posters addressing reporting methods; and an examination of policies, documentation, and the Forgiven Ministries MOU further confirmed compliance with this standard.

115.52	Exhaustion of administrative remedies
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 651 300">POLICY AND DOCUMENT REVIEWED:</p> <p data-bbox="242 329 596 358">Pre-Audit Questionnaire responses</p> <p data-bbox="242 385 989 414">Agency Prison Policy .0300, Chapter G, Administrative Remedy Procedure</p> <p data-bbox="242 443 526 472">DC-239, Rules and Policies,</p> <p data-bbox="242 501 512 530">Offender Grievance Forms</p> <p data-bbox="242 560 478 589">Intake PREA Pamphlet</p> <p data-bbox="242 616 486 645">Offender Grievance Log</p> <p data-bbox="242 674 1184 703">Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy</p> <p data-bbox="242 730 1485 925">Agency policy .0300, Administrative Remedy Procedure describes the grievance procedure for dealing with Offender grievances regarding sexual abuse. Agency policy advises, Offenders shall utilize the Offender grievance system to report sexual abuse or sexual harassment by a staff member or Offender-on-Offender sexual abuse, as defined in the Glossary of Terms for this procedures manual. However, if an Offender files a grievance related to staff on Offender sexual abuse/sexual harassment or Offender on Offender sexual abuse, the Facility Grievance Coordinator shall forward it to the facility PREA Investigator for tracking and investigation. The Offender shall be notified of this action.</p> <p data-bbox="242 954 1474 1149">There have been 18 allegations of sexual harassment or sexual assault submitted through the grievance process in the last 12 months. Interviews with the PREA Compliance Manager revealed that while the grievance process is set up for reporting of allegations of sexual abuse and sexual harassment, in the instances such allegations are received through this channel, they are forwarded to the PREA Investigator for immediate investigation There were 8 allegations of imminent risk reported as an emergency grievance. There were two allegation that were unfounded and offenders were notified and disciplinary action taken for filing a false grievance report.</p> <p data-bbox="242 1178 1474 1440">The standard requires a decision be made on the merits of any grievance alleging sexual abuse within 90 days. NCDPS Policy requires a response time of 30 days. Policy and procedures permits third parties to assist inmates in filing request for administrative remedies relating to allegations of sexual abuse and are also permitted to file such requests on behalf of an inmate. Policy and procedures are in place that allow for an inmate to file an emergency grievance alleging that there is substantial risk of imminent sexual abuse. Any grievance received by staff alleging an inmate is subject to a substantial risk of imminent sexual abuse will be reported to the OIC (Officer in Charge) at which point immediate corrective action may be taken. The initial response is completed before the end of the shift of when the incident was reported and the final agency decision within five days.</p> <p data-bbox="242 1469 1410 1532">The agency did not ask for an extension on investigating any grievances. All grievances were responded to within the approved policy and PREA standards timelines.</p> <p data-bbox="242 1561 1490 1722">The facility has grievance boxes located in each unit and in the dining room for inmates to provide unimpeded access to filing grievances. Interviews with staff (including the Grievance Coordinator) and inmates and an examination of supporting Policy/documentation confirm compliance with this standard. An interview with over 30 offenders confirmed that the facility has a grievance system, offenders have appropriate access to the system and the facility and agency responds to all grievances within the time line established by NDCPS polices and PREA standards.</p>

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy</p> <p>Memorandum of Understanding, REAL Crisis Intervention INC.</p> <p>Agency Policy Chapter IV.0100, Mailroom Procedure</p> <p>PREA Reporting Poster, Help Prevent Prison Sexual Violence</p> <p>NCDPS, Facilitator Talking Points Document: Offender Sexual Abuse and Sexual Harassment Intake/Orientation Upon Transfer</p> <p>NCDPS, Sexual Abuse Awareness for the Offender Brochure</p> <p>Offender Handbook</p> <p>NCDPS, Maintaining an Atmosphere of Professionalism</p> <p>NCCASA Document, The North Carolina Approach</p> <p>NCDPS, Outside Confidential Support Services Memo</p> <p>Agency prison policy 3400 advises the PREA Support Person (PSP) shall ensure that Offenders are offered and provided with access to outside victim advocates for emotional supportive services related to sexual abuse which has occurred in a confinement setting. Supportive services may be provided via a variety of methods including in person, during a non-monitored phone call, and/or in writing. During the closeout, the regional PREA Program Analysis indicated she had Posters that included reporting utilizing *63 that bypassed the phone system to contact the Victim Emotional Support staff and forwarded the information to the facility during the out briefing along with Posters. This information was shared with the PREA compliance manager. The Warden was not available for the close out due to medical. The facility entered a corrective action plan to update all information regarding reporting and advise offenders of the reporting system. The facility completed the task during the 45 days of the time the audit was conducted and published the report. However, in order to comply with this standard it was determined that the interim report would be implemented for the 45 day period and the final report would be submitted after the 45 days implementation period. Offenders can contact the Rape Crisis Center without the call being monitored by calling *63. This information is posted in English and Spanish, The PSP shall be made available to provide victim advocate services and shall consult with the Facility Head on a weekly basis for three weeks following the report of sexual abuse to update the victim on the progress of the investigation, answer any questions of the offender victim, and provide support. As requested by the victim, the PREA support person, of the same gender, shall accompany and support the victim through the forensic medical examination process. As requested by the victim, the PREA support person shall accompany and support the victim through the investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals. The offender victim shall be provided access to outside victim advocates for emotional support services related to sexual abuse by giving the offenders mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations. The facility shall enable reasonable communication between offenders and these organizations and agencies, in as confidential manner as possible. ECI utilizes the services of the REAL Crisis Intervention INC. to provide confidential services to persons through counseling, preventive education, and advocacy. REAL Crisis Intervention INC. information is posted in all Offender living units and listed on the initial intake PREA pamphlet provided upon arrival to the facility. The auditor confirmed the facility provides the name and address, at no cost to the Offender and these services are confidential.</p> <p>ECI does not detain persons solely for civil immigration services. The auditor confirmed the PREA Support Person (PSP) would be assigned to provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free helpline numbers where available of local, State, or national immigrant services agencies. This information was confirmed during the facility Warden interview. The random staff interviewed were able to identify the Interact as an option for confidential Offender support services. The auditor interviewed one (1) Offender that had reported a sexual assault allegation. Most offenders interviewed indicated knowledge of the Victim Advocacy Services and knew how to find the address and phone number on a pamphlet located in the living units. Interviews with the Offender that reported an allegation in the past advised he was offered the PREA pamphlet and had not chosen to use the services.</p>

Compliance was determined by testing the telephone system after correction action plan related to standard 115:51 and 115:53 and interviewing the PREA compliance managers and staff from the REAL Crisis Intervention Program.

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy</p> <p>Memorandum of Understanding, REAL Crisis Intervention INC.</p> <p>Agency Policy Chapter IV.0100, Mailroom Procedure</p> <p>PREA Reporting Poster, Help Prevent Prison Sexual Violence</p> <p>NCDPS, Facilitator Talking Points Document: Offender Sexual Abuse and Sexual Harassment Intake/Orientation Upon Transfer</p> <p>NCDPS, Sexual Abuse Awareness for the Offender Brochure</p> <p>NCDPS, Maintaining an Atmosphere of Professionalism</p> <p>NCDPS Document, The North Carolina Approach</p> <p>A Corrective Action Plan was required to comply with this standard. During the onsite visit at the facility the informational Posters were not available in all areas for third party reporting. Staff posted the information during the onsite visit.</p> <p>The NCDPS Prison Policy F.3400 Inmate Sexual Abuse and Sexual Harassment identifies the Department's third party reporting processes and instruct staff to accept third party reports. The agency website provide information on ways that family, friend or other persons or organization may contact the NCDPS to report allegations of sexual abuse or sexual harassment. The link also provides a telephone number for third party reporting. The agency also provides an address for third party reporting. This information is reported directly to the State-wide PREA Coordinator who will inform the Facility Superintendent. These reports will be investigated.</p> <p>The information on how to report is now displayed throughout the facility including the visitation areas of the facility. Additionally, NCDPS provides staff with a brochure that provides multiple ways for staff to report allegations of sexual abuse or sexual harassment. All inmate interviews confirmed their awareness of reporting sexual abuse or harassment to others outside of the facility. All staff interviews were able to describe how reports may be made by third parties.</p> <p>Interviews with staff and inmates; observations of posters addressing reporting methods; and an examination of policies, documentation, and contacting the telephone number provided on the poster confirmed compliance with this standard.</p>

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy</p> <p>Incident Report Forms</p> <p>Incident Reports Relating to Sexual Abuse</p> <p>Incident Reports Relating to Sexual Harassment</p> <p>Incident Management System Allegations</p> <p>Facility Prison policy F.3400 Offender Sexual Abuse and Sexual Harassment mandates that all staff, contractors, and volunteers are required to report any information regarding sexual abuse or sexual harassment or any staff neglect, action or violation that may contribute to an incident or an act of retaliation. The reporting is ordinarily made to the OIC but could also be made privately or to a third-party.</p> <p>Prison policy requires the information concerning the identity of the alleged inmate victim and the specific facts of the case to be shared with staff who need-to-know because of their involvement with the victim's welfare and/or the investigation of the incident. Medical and Mental Health staff were aware of their responsibilities to report allegation of sexual abuse or sexual harassment. Interviews with staff confirmed they were aware of their reporting duties. Additional compliance with all aspects of the standard was verified through document and Prison policy review. The facility does not house Offender under the age of 18. All staff and inmates interviewed provided ways to report sexual abuse or sexual harassment.</p>

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p>Agency policy .0300, Chapter G, Administrative Remedy Procedure</p> <p>Rules and Policies, Offender Handbook</p> <p>Agency prison policy 3400, Chapter F explains that when Department staff learn that an Offender is subject to a substantial risk of imminent sexual abuse, appropriate and immediate action shall be taken to protect the Offender. Alleged Offender victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the alleged victim. The facility Warden indicated segregation may be ordered immediately to protect the Offender or others, but the action must be reviewed within 24 hours by the housing committee. The Warden interview determined the agency takes all allegations serious and any Offender subject to imminent sexual abuse will receive immediate action. The facility reported no incidents in the past 12 months that determined an Offender was subject to a substantial risk of imminent sexual abuse.</p> <p>The auditor interviewed an offender identified as being housed in segregation. The interview determined the housing was due to behavior concerns and not for high risk of sexual victimization. The auditor interviewed one (1) that previously reported an allegation of sexual abuse. The offender indicated no concerns with his current housing.</p> <p>Compliance was determined by review of policies, interviews with Warden, Random Staff, inmate that made allegation of sexual abuse, supervisor for the Segregation Unit and PREA Investigator.</p>

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p>Correspondence Tracking System</p> <p>Agency policy F.3400 Offender Sexual Abuse and Sexual Harassment states that upon receiving an allegation that an inmate was sexually abused while confined at another facility, the Superintendent will notify the head of the facility or appropriate office of the agency or facility where the sexual abuse allegedly occurred. Prison policy requires such notification will occur as soon as possible and no later than 72 hours of receiving the allegation. Documentation is required of any such notification.</p> <p>There have been no allegation of an inmate being sexually abused while confined at another facility during the previous 12 months.</p> <p>There have been no allegation of an inmate being sexually abused at ECI that was received at another institution during intake screening at receiving institution. Compliance with this standard was verified by reviewing Policy and interviews with intake staff, investigator and ECI PREA compliance manager and facility warden.</p>

115.64	<p>Staff first responder duties</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>ECI Responses to the Pre-Audit Questionnaire</p> <p>Agency Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment</p> <p>Sexual Abuse and Sexual Harassment (101) Lesson Plan</p> <p>Sexual Abuse and Sexual Harassment (201) Lesson Plan</p> <p>Prison Rape Elimination Act (PREA) of 2003 Acknowledgement Form, OPA-T10</p> <p>Emergency Responses Card</p> <p>NCDPS Prison NCDPS Prison Policy F .3400 Offender Sexual Abuse and Sexual Harassment mandates staff responsibilities for security and non-security employees. The directives for the security staff include the following four step action plan: separate the alleged victim and abuser, preserve, and protect the scene, collect the evidence if time is allotted, and do not allow the victim or abuser to participate in any activities that may destroy evidence such as: washing, brushing teeth, changing clothes, urinating, defecating, smoking, or eating. If the first responder is a non-security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and notify a security staff member immediately. The facility reported 8 allegations of sexual abuse within the past 12 months, Four (4) of the allegations were made to non-uniformed correctional staff. The auditor concluded staff knowledge regarding these actions throughout the facility as the auditor interviewed 4 non security staff designated as a first responder and 18 security staff. The common response was to notify a supervisor immediately and follow the four-step action plan. The action plan was also noted in the employee handbook, staff training curriculum, and verified during the Warden interview. ECI assigns an Investigator immediately when information is reported or discovered.</p> <p>Compliance was determined by review of the allegation of sexual abuse or sexual harassment, review of investigation files, computer tracking system and interviews with non uniform staff, uniformed correctional staff, PREA compliance managers and Warden. Compliance was also determined by review of NCDPS staff training program.</p>
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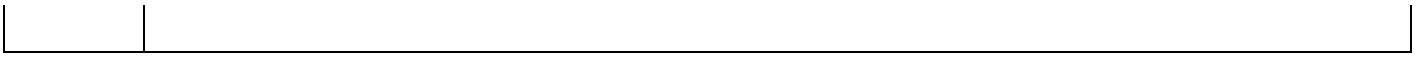
115.65	Coordinated response
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 651 300">POLICY AND DOCUMENT REVIEWED:</p> <p data-bbox="242 329 596 358">Pre-Audit Questionnaire responses</p> <p data-bbox="242 387 1189 416">Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p data-bbox="242 445 834 474">SOP 9.30 PREA Sexual Abuse Institutional Response Plan</p> <p data-bbox="242 504 541 533">First Responder Action Cards</p> <p data-bbox="242 562 636 591">OPA-120, Incident Scene Tracking Log</p> <p data-bbox="242 620 1027 649">Flow Chart for Investigating Sexual Abuse and Sexual Harassment Allegations</p> <p data-bbox="242 678 778 707">Sexual Abuse Response and Investigations Checklist</p> <p data-bbox="242 736 783 766">PREA Investigation Conclusion Checklist, Investigator</p> <p data-bbox="242 795 523 824">PREA Post Incident Review</p> <p data-bbox="242 853 644 882">PREA Evidence Chain of Custody Form</p> <p data-bbox="242 911 1493 1066">North Carolina Department of Public Safety implemented a mandate that all facilities or centers shall develop and implement a Coordinated Response Plan and will review and update the plan as required but at least annually. ECI implement the Coordinated Response Plan in 2015 and published the latest update on September, 2020. All staff interviewed were aware of their discipline's role and responsibilities in cases of sexual abuse allegations. The following staff were interviewed of their specific role in the coordinated response plan and all were able to articulate their responsibilities.</p> <p data-bbox="242 1095 331 1124">Warden</p> <p data-bbox="242 1153 411 1182">Shift Supervisor</p> <p data-bbox="242 1211 451 1240">Correctional Officers</p> <p data-bbox="242 1270 418 1299">First Responders</p> <p data-bbox="242 1328 308 1357">Nurse</p> <p data-bbox="242 1386 475 1415">Mental Health Provider</p> <p data-bbox="242 1444 528 1473">PREA Compliance Manager</p> <p data-bbox="242 1503 470 1532">PREA Support Person</p> <p data-bbox="242 1561 557 1590">Sexual Abuse Response Team</p> <p data-bbox="242 1619 713 1648">REAL Crisis Intervention INC of Greenville, NC</p> <p data-bbox="242 1677 542 1706">SANE Staff at Medical Center</p> <p data-bbox="242 1736 1481 1765">This plan addresses address Medical, Mental Health, PSP, and victim confidential support and retaliation monitoring duties.</p> <p data-bbox="242 1794 1460 1845">Compliance was determined by review of the Response Plan and review of the staff training program. Also interviews with the above staff confirmed compliance with this standard.</p>

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	<p data-bbox="244 210 453 237">Auditor Discussion</p> <p data-bbox="244 271 651 297">POLICY AND DOCUMENT REVIEWED:</p> <p data-bbox="244 331 596 358">Pre-Audit Questionnaire responses</p> <p data-bbox="244 389 1190 416">Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p data-bbox="244 448 1481 640">ECI has not entered into any agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with Offenders pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted. In deciding to suspend an employee pending investigation, the Department must be able to demonstrate that the "nature of the allegations" is such that there is caused to remove the employee from the institution pending investigation and not that the employee committed the offenses. The facility Warden interview indicated no collective bargaining agreements have been entered by this agency that would limit the restrictions of staff pending investigations.</p> <p data-bbox="244 672 1211 698">Compliance was determined by review policies and interview with the Agency Head and Warden.</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 210 451 235">Auditor Discussion</p> <p data-bbox="242 271 651 295">POLICY AND DOCUMENT REVIEWED:</p> <p data-bbox="242 329 596 353">Pre-Audit Questionnaire responses</p> <p data-bbox="242 387 1190 412">Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p data-bbox="242 445 1094 470">OPA-I24, PREA Offender/Juvenile Retaliation Monitoring and Periodic Status Checks</p> <p data-bbox="242 504 1493 1160">The agency has established a policy to protect all Offenders and staff who report sexual abuse or harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation, and this is described in agency policy 3400, Chapter F, pages 21-23. The Department shall protect all Offenders and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other Offenders or staff. For at least 90 days following a report of sexual abuse or sexual harassment, the PREA Support Person (PSP) shall monitor the conduct and treatment of third-party reporters and any other individual who cooperates with an investigation. The facility PREA Support Person (PSP) are the designated staff members charged with monitoring possible retaliation. These positions are provided the necessary support by the Warden, and the interview process indicated an active role toward retaliation monitoring advising this is an ongoing process. All reports of retaliation monitoring are forwarded to the facility PREA Compliance Manager (PCM). The facility attempts to employ multiple protection measures by monitoring housing changes, transfers for Offender victims and abusers, removal of staff through termination, emotional support services, monitoring the Offender and staff performance evaluations, disciplinary actions, unannounced lockdowns, denial of privileges, grievances, and the Offenders are provided with materials to assist the communication process. Literature is posted in the Offender handbook, posters, and methods of reporting retaliation described in the daily Offender education. The Warden indicated additional reviews may be considered once the 90- day review has concluded. Random interviews with 12 staff members and 15 random Offenders indicated no cause for concern with retaliation. As one Offender indicated they are keeping us safe and watching us all the time. The auditor interviewed the PREA Compliance Manager, 4 Offenders that previously reported sexual abuse, and an Offender identified as high risk for sexual victimization, and no interviews indicated retaliation concerns. The facility reported 0 allegations of retaliation in the past 12 months, and the investigative files demonstrated documented 90-day reviews.</p> <p data-bbox="242 1193 1493 1417">When interviewed, the three staff members that have collateral duties as PSP stated they would document and follow up on all potential cases to ensure Policy is being enforced. They will conduct periodic status checks on the frequency of incident reports, housing reassignments, program changes, any negative consequences for reporting abuse and negative performance reviews/staff job reassignments (all steps required of 115.67c). If there was a concern that there was the potential for possible retaliation, the PSP stated they would monitor the situation indefinitely. The monitoring of any type of retaliation will be done for at least 90 days or as long as needed to make sure the inmate is safe from retaliation or the inmate is transferred.</p> <p data-bbox="242 1451 1493 1576">Policy outlines the protection measures available and requires the prompt remediation of any type of retaliation. NCDPS has developed a designated form to be used when retaliation is being monitored. This document maintains all of the requirements established in the standard for agency protection against retaliation. Substantial compliance with this standard was determined by a review of policy/documentation and staff interviews.</p>

115.68	Post-allegation protective custody
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 651 300">POLICY AND DOCUMENT REVIEWED:</p> <p data-bbox="242 329 596 358">Pre-Audit Questionnaire responses</p> <p data-bbox="242 387 1193 416">NCDPS Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p data-bbox="242 445 1051 474">NCDPS, Mental Health Screening Inventory, Offender Population Unified System</p> <p data-bbox="242 504 922 533">NCDPS, Screening for risk of Sexual Victimization and Abusiveness</p> <p data-bbox="242 562 1437 622">Health Services Policy and Procedures Manual, TXI-13, Care and Treatment of Patient, Education, and Management of Disorders of Gender Dysphoria</p> <p data-bbox="242 651 890 680">Screening Review for High-Risk Victims and Abusers Document,</p> <p data-bbox="242 710 922 739">NCDPS, Screening for risk of Sexual Victimization and Abusiveness</p> <p data-bbox="242 768 1489 893">Agency prison policy 3400, Chapter F, clearly the mandates of this standard. Offenders at high risk of sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and there are no other alternative means of separation. The Offender will not be held for more than 24 hours to complete the assessment.</p> <p data-bbox="242 922 1489 1086">When an Offender is placed into involuntary Administrative Custody due to high risk for sexual victimization or after allegedly suffering sexual abuse, the hearing shall take place within 24 hours of placement or the next business day. The reason(s) for the Offender's confinement must be explained to the Offender in writing and the Offender must be provided with the Administrative Segregation Form. When an Offender is placed into involuntary segregation due to high risk for sexual victimization or after allegedly suffering sexual abuse, the form must articulate:</p> <ol data-bbox="242 1115 949 1256" style="list-style-type: none"> a. the basis for the staff member's concern for the Offender's safety. b. the other alternative means of separation that were explored, and c. the reason why no alternative means of separation can be arranged. <p data-bbox="242 1285 1476 1480">This policy allows for programming, privileges, education, and work opportunities to the extent possible. This auditor reviewed the segregated housing records and spoke with the staff that supervise Offenders in segregated housing. No Offenders in the past 12 months were identified to be housed in segregated housing involuntary. The initial review would be conducted within 24 hours. The Offenders would be reassigned to general population. The facility would document the privileges such as recreation, education, and programming. The Offender may not be authorized work opportunities due to behavior concerns and this would be documented on the segregation forms.</p> <p data-bbox="242 1509 1374 1570">Substantial compliance with this standard was determined by a review of policy/documentation and interview with Segregation Sgt. PREA compliance Manager and Warden.</p>

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p>NCDPS Memorandum to Local Law Enforcement Agencies and Sheriff</p> <p>Form OPA-I20, Incident Scene Tracking Log</p> <p>Incident Management System Allegations</p> <p>Policy CP-18, Section: Clinical Practice Guidelines, Sexual Abuse,</p> <p>Policy 143B-1200, Part 1, Assistance Program for Victims of Rape and Sex Offenses</p> <p>NCDPS, PREA Support Person Role and Responsibilities Document</p> <p>NCDPS, Form OPA-A18, Designation of PREA Support Person Memo</p> <p>PREA Support Training, 7 Hours, On-line curriculum-based learning</p> <p>NCDPS F.3400 Offender Sexual Abuse and Sexual Harassment of allegation of sexual abuse or sexual harassment are promptly, thoroughly and objectively investigated. The agency Prison policy requires that criminal investigations are conducted by outside law enforcement, therefore the facility investigators only conduct an initial investigation to determine if outside law enforcement is to be notified. When the facility conducts investigations, the agency uses investigators who have received specialized training in conducting sexual abuse investigations in a confinement setting.</p> <p>Administrative investigations address staff actions, credibility and a review of facts and findings of the criminal investigation (if applicable). All interviews are conducted as approved by the Office of Special Investigations. Both criminal and administrative investigations are well documented and maintained in the files. Files reviewed included a copy of the law enforcement report, if they conducted a criminal investigation, statements of victim, alleged abuser (if identified) and witnesses, and statements by the PSP and Investigator as to the steps they took during the investigation.</p> <p>Investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data. Investigators interview alleged victims, suspected perpetrators, and any other possible witnesses. Investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator. The agency only conducts compelled interviews after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.</p> <p>Substantiated allegations of conduct that appear to be criminal are referred for prosecution. The credibility of an alleged victim, suspect or witness is assessed on an individual basis and is not determined by the person's status as inmate or staff. The agency does not require an inmate who alleges sexual abuse to submit to a polygraph examination or other truth assessment device as a condition for proceeding with the investigation of such an allegation.</p> <p>All administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse. Administrative investigations are 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. Criminal investigations are documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence. The agency retains all written reports pertaining to the administrative or criminal investigation of alleged sexual assault or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.</p> <p>The agency does 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. When an outside entity investigates sexual abuse, the facility cooperates with outside investigators and endeavors to remain informed about the progress of the investigation. There have been 82 investigations during the last twelve (12) months. Eight of these investigations were conducted by local law enforcement. All investigators were trained in conducting sexual abuse investigation in a confinement setting. The findings were that cases were managed appropriately, completed promptly, thoroughly and in compliance with Policy. Compliance with this standard was determined by a review of Policy /documentation and interviews with investigator.</p>



115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>ECI Responses to the Pre-Audit Questionnaire</p> <p>Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment</p> <p>Investigative Reports</p> <p>NCDPS Prison policy 3400 requires the facility shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. The interview with the agency PREA Investigator revealed the facility standard is preponderance of the evidence for all administrative investigations. Compliance was determined by review of the allegation of sexual abuse or sexual harassment, review of investigation files, computer tracking system and interviews with investigative.</p>

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 271 651 297">POLICY AND DOCUMENT REVIEWED:</p> <p data-bbox="240 329 711 356">ECI Responses to the Pre-Audit Questionnaire</p> <p data-bbox="240 387 1118 414">Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment</p> <p data-bbox="240 445 456 472">Investigative Reports</p> <p data-bbox="240 504 1489 728">NCDPS Prison policy F .3400 Offender Sexual Abuse and Sexual Harassment addresses this standard. The PREA Support Person is responsible for the implementation of this Prison policy. NCDPS developed Form OPA-I30A for providing information to inmates during and at the conclusion of investigations for sexual abuse or sexual harassment. Support services staff in line with Prison policy F .3400, following an investigation into an inmate's allegation of sexual abuse in an agency facility, the agency informs the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. If the agency did not conduct the investigation into an inmate's allegation of sexual abuse the agency or facility will request the relevant information from the investigative agency in order to inform the inmate.</p> <p data-bbox="240 759 1485 887">Following an inmate's allegation that a staff member has committed sexual abuse against him, unless the agency has determined that the allegation is unfounded or unless the inmate has been released from custody, the agency subsequently informs the inmate whenever the staff member is no longer posted within the inmate's unit or the agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility.</p> <p data-bbox="240 918 1492 1077">The agency documents all such notifications or attempted notifications through the use of NCDPS form OPA-I30A. The facility support staff and facility PREA compliance manager provided a copy of six documents that were utilized in cases of allegations of sexual abuse that were unsubstantiated. There were two allegation that were unfounded. Compliance with this standard was verified through the review of agency policy, and interviews with PREA support staff and PREA compliance manager.</p>

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p>ECI SOP 9.24 Sexual Abuse-Harassment PREA</p> <p>ECI SOP 9.24 Sexual Abuse-Harassment PREA and NCDPS Prison policy F .3400 Offender Sexual Abuse and Sexual Harassment mandate that staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment Prison policy requires that termination is the presumptive disciplinary sanction for staff members who have engaged in sexual abuse.</p> <p>Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) is commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, will be reported to law enforcement agencies (unless the activity was clearly not criminal) and to relevant licensing bodies. There have been no adverse action with staff for violation of PREA standards or violation of NCDPS code of ethics. Compliance with the Standard was verified by review of appropriate policies, interviews with PREA Compliance Manager and Warden, and review of the Department's website that includes related PREA information.</p>

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p>ECI SOP 9.24 Sexual Abuse-Harassment PREA</p> <p>Volunteer Training and Records</p> <p>NCDPS Prison policy F. 3400 Offender Sexual Abuse and Sexual Harassment mandates that any contractor or volunteer who engages in sexual abuse be prohibited from contact with inmates. Any contractor or volunteer who engages in sexual abuse will be reported to law enforcement agencies (unless the activity was clearly not criminal). In the case of any other violation of agency sexual abuse and sexual harassment policies by a contractor or volunteer, the facility will take appropriate remedial measures, and consider whether to prohibit further contact with inmates. Further, this information is provided to volunteers and contractors through the Volunteer and Contractor Training modules. There have been no adverse action regarding volunteers or contractors in the last 12 months.</p> <p>Contractors and volunteers sign a NCDPS directive entitled Prison Rape Elimination Act of 2003 Acknowledgement Form. Compliance of this standard was confirmed through review of the Prison policy, training records of volunteers and contractors, review of volunteer files containing acknowledgement statements, and interviews with volunteer supervisor.</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p>ECI SOP 9.24 Sexual Abuse-Harassment PREA</p> <p>Agency Policy 3405, Section H, Disciplinary Sanctions, pages 29-31</p> <p>Discipline Related to Sexual Abuse, Sexual Harassment, or Retaliation</p> <p>Offender Disciplinary File</p> <p>Offender engaged in Offender-on-Offender sexual abuse or following a criminal finding of guilt for sexual abuse may be discipline based on the Agency Policies and Disciplinary Sanctions. The facility reported no administrative findings of Offender-on-Offender sexual abuse or criminal findings in the past 12 months. There were no Substantiated Offender on Offender Abuse allegations. There were no cases referred to the prosecutor. The Mental Health staff indicated potential screenings to address or correct the underlying reasons or motivations for abuse. The facility utilizes Mental Health Professionals for counseling services for inmates that have history of Sexual Abuse or Sexual harassment.</p> <p>Agency prison policy 3400 mandates the facility may discipline an Offender for sexual contact with staff only upon a finding that the staff member did not consent to such contact. The facility prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish enough evidence to substantiate the allegation. The facility prohibits all sexual activity between Offenders and may discipline Offenders for such activity.</p> <p>Policy states inmates are subject to disciplinary sanctions following an administrative finding the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse. The facility prohibits all sexual activity between inmates. Sanctions are commensurate with the nature and circumstances, subject's prior history, and sanctions imposed for comparable offenses. The inmate's mental health is also considered.</p> <p>Inmates may be disciplined for sexual contact with staff only upon a finding that the staff member did not consent to such contact. The facility does not discipline inmates who make an allegation in good faith, even if an investigation does not establish evidence sufficient to substantiate the allegation. Interviews with investigators, mental health professionals and review of Policy confirmed compliance with this standard. The facility has not had an allegation of sexual abuse or sexual harassment nor a disciplinary hearing due to inappropriate sexual activity within the last 12 months.</p> <p>Interviews with investigators and review of Policy confirmed compliance with this standard. The facility has not had an allegation of sexual abuse or sexual harassment that resulted to a disciplinary hearing due to inappropriate sexual activity within the last 12 months.</p>

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p>NCDPS, Risk to Sexual Victimization and Abusiveness Screening Guide</p> <p>NCDPS, Mental Health Screening Inventory, Offender Population Unified System (OPUS),</p> <p>NCDPS, Screening for risk of Sexual Victimization and Abusiveness: PREA Standards 115.41 and 115.42 Guidelines Memo</p> <p>NCPDS, Diagnostic Policy Update Memo, pages 1-2, October 9, 2013</p> <p>PREA Screening Factsheet OPA-S010 04-27-2021</p> <p>PREA Memorandum3 Risk Reassessment</p> <p>Screening Inventory Update 2021</p> <p>Offender engaged in Offender-on-Offender sexual abuse or following a criminal finding of guilt for sexual abuse may be discipline based on the Agency Policies and Disciplinary Sanctions. The facility reported no administrative findings of Offender-on-Offender sexual abuse or criminal findings in the past 12 months. There were no Substantiated Offender on Offender Abuse allegations. There were no cases referred to the prosecutor. The Mental Health staff indicated potential screenings to address or correct the underlying reasons or motivations for abuse. The facility utilizes Mental Health Professionals for counseling services for inmates that have history of Sexual Abuse or Sexual harassment.</p> <p>Agency prison policy 3400 mandates the facility may discipline an Offender for sexual contact with staff only upon a finding that the staff member did not consent to such contact. The facility prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish enough evidence to substantiate the allegation. The facility prohibits all sexual activity between Offenders and may discipline Offenders for such activity.</p> <p>Policy states inmates are subject to disciplinary sanctions following an administrative finding the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse. The facility prohibits all sexual activity between inmates. Sanctions are commensurate with the nature and circumstances, subject's prior history, and sanctions imposed for comparable offenses. The inmate's mental health is also considered.</p> <p>Inmates may be disciplined for sexual contact with staff only upon a finding that the staff member did not consent to such contact. The facility does not discipline inmates who make an allegation in good faith, even if an investigation does not establish evidence sufficient to substantiate the allegation. Interviews with investigators, mental health professionals and review of Policy confirmed compliance with this standard. The facility has not had an allegation of sexual abuse or sexual harassment nor a disciplinary hearing due to inappropriate sexual activity within the last 12 months.</p> <p>Interviews with investigators and review of Policy confirmed compliance with this standard. The facility has not had an allegation of sexual abuse or sexual harassment that resulted to a disciplinary hearing due to inappropriate sexual activity within the last 12 months.</p> <p>Sexual Abuse and Sexual Harassment establishes the agency's practices for Medical and Mental Health Screening. The Screening includes whether a prison inmate has experienced prior sexual victimization and whether it occurred in an institutional setting or in the community. Staff ensures that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening where abuse was alleged.</p> <p>Any information related to sexual victimization or abusiveness that occurred in an institutional setting is limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law. 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. Secondary mental health/medical materials and consent documentation can be found in the medical area of the facility. The facility has a full time nurse and an mental health services 8 hours a day and on call mental health service 24 hours a day. The medical and mental Health staff interviewed conduct medical health assessment and a mental health screening during the initial intake to</p>

the facility, usually within four (4) hours of arriving to the facility. Inmate that have history of victimization regardless of while in an institution as a child are provided mental health interviews within 14 days. This usually occurs within 4 hours. Offenders that perpetrate sexual abuse are also offered mental health services within 14 days but usually within 4 hours. Compliance was determined by review of policy, intake documentation, mental health referral forms and interviews with intake staff, inmate that claims prior victimization and medical/mental health staff.

115.82	<p>Access to emergency medical and mental health services</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p>Mental Health Confidential Disclosure Statement</p> <p>Medical and Mental Health Records</p> <p>ECI SOP 930 Sexual Abuse Response Plan</p> <p>NCDPS Clinical Practice Guidelines CP – 18</p> <p>Agency Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy establishes the protocol for sexual abuse clinical guidelines for the assessment and treatment of inmates who allege sexual abuse. Prison policy and protocol mandates 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.</p> <p>The security staff first responders will immediately notify the appropriate medical and mental health practitioners. Where medically appropriate the facility will ensure victims are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care. All treatment services will be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>ECI has a MOU for mutual aid and uses the Vidant Medical Center that provides a Sexual Assault Nurse Examiner for conducting the medical forensic examination and provides medical care as required. The MOU with the REAL Crisis Intervention. provides staff to report to the hospital as required to provide support services. Verification was confirmed by review of policy, interviews with medical and mental health staff, and telephone conversations with the representative from the REAL Crisis Intervention INC. Compliance was also confirmed by review of NCDPS clinical practices, interviews with first responders and Medical Staff.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>NCDPS Prison Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p>Mental Health Confidential Disclosure Statement</p> <p>Medical and Mental Health Records</p> <p>ECI SOP 930 Sexual Abuse Response Plan</p> <p>NCDPS Clinical Practice Guidelines CP – 18</p> <p>NCDPS Clinical Practice Guidelines CP–18 establishes the protocol for sexual abuse clinical guidelines for the assessment and treatment of inmates who allege sexual abuse. The facility will provide sexually abused victims with medical and mental health services consistent with the community level of care. Inmate victims of sexual abuse will be offered tests for sexually transmitted infections as medically appropriate. All treatment services will be provided without financial cost to the victim and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>The facility will 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. NCDPS Clinical Practice Guidelines Prison policy CP – 18 also establishes the protocols for mental health aftercare planning for inmates no later than 30 days prior to the anticipated date of release for inmates subjected to Sexual abuse.</p> <p>The MOU with the REAL Crisis Intervention. provides continuing emotional support for offenders of sexual abuse. Compliance to the Standard was verified through review of policy and interviews with Nurse.</p>

115.86	<p>Sexual abuse incident reviews</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>POLICY AND DOCUMENT REVIEWED:</p> <p>Pre-Audit Questionnaire responses</p> <p>Agency Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p>NCDPS, OPA-I10, Post Incident Review Form</p> <p>NCDPS Prison policy F .3400 Inmate Sexual Abuse and Sexual Harassment addresses this standard and requires that each facility conduct a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. The facility Warden establishes members of the incident review team. The review is conducted within 30 days of the conclusion of the sexual abuse investigation.</p> <p>The incident review team includes upper-level management officials, with input from line supervisors, investigators, and medical and/or mental health practitioners. The review team considers whether the allegation or investigation indicates a need to change Policy or practice to better prevent, detect, or respond to sexual abuse in each review. The review team also considers whether the incident or allegation was motivated by race; ethnicity; gender identity; gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility.</p> <p>The area in the facility where an incident allegedly occurred is assessed by the incident review team as to whether physical barriers in the area may enable abuse. Additionally, the review team assesses the adequacy of staffing levels in the area of the facility where a sexual abuse incident allegedly occurred, during different shifts. The review team also assesses whether monitoring technology should be deployed or augmented to supplement supervision by staff on each incident. A written report of the incident review team's findings, including any recommendations for improvement is developed and submitted to the Warden and is then forwarded to the Regional Director. There were 8 allegations of sexual abuse, two (2) were unfounded and six resulted in an incident review team meeting. The incident review team provided documentation of incident reviews, completed investigative information, findings of Incident Reports and documentation supporting implementations or reasons for not implementing recommendations. There were a total of 84 PREA allegations in the PAQ. However, there were only 8 allegations of sexual abuse. A review of the agency data base confirmed there were only 8 incidents that required IRT based on the allegations and findings. Compliance was determined by review of the PAQ sexual abuse allegations, review of the investigative files and interviews with the Warden and Incident Team member.</p>
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115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>ECI is a State operated Correctional Institution. The institution provides documentation utilizing the agency OPUS system. This Standard is audited at the Agency Level. Based on review of the PAQ and interviews with the agency contracting officer and PREA coordinator and facility PREA compliance manager the facility is in compliance with this standard. A review of the annual report can be found on https://files.nc.gov/ncdps/documents/files/2019-Sexual-Abuse-Report.p</p>

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	<p data-bbox="231 190 1508 257">Auditor Discussion</p> <p data-bbox="231 257 1508 459">NCDPS Prison policy F .3400 Inmate Sexual Abuse and Sexual Harassment address the requirements of this standard. The PREA Office collects accurate, uniform data for every allegation of sexual abuse at facilities under the agency's direct control using a standardized instrument and set of definitions. The PREA Office aggregates the incident-based sexual abuse data annually. The incident-based data includes the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.</p> <p data-bbox="231 459 1508 705">The PREA Office maintains, reviews, and collects data as needed from all available incident based documents, including reports, investigation files, and sexual abuse incident reviews. The PREA Office aggregated data from every facility with which it contracts for the confinement of inmates. Upon request, the agency provides all such data from the previous calendar year to the Department of Justice. The facility PREA Compliance Manager provided copy of Annual PREA Report and information regarding the incident reporting computerized system OPUS Packet. Compliance with this standard was also determined by a review of Prison policy/documentation PREA agency Website and staff interviews. The reports website is https://files.nc.gov/ncdps/documents/files</p>

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	<p data-bbox="229 192 1508 255">Auditor Discussion</p> <p data-bbox="229 255 1508 318">POLICY AND DOCUMENT REVIEWED:</p> <p data-bbox="229 318 1508 380">Pre-Audit Questionnaire responses</p> <p data-bbox="229 380 1508 443">Agency Policy 3400, Chapter F, Offender Sexual Abuse and Sexual Harassment Policy,</p> <p data-bbox="229 443 1508 506">Incident Management System Allegations.</p> <p data-bbox="229 506 1508 568">https://files.nc.gov/ncdps/documents/files/2019-Sexual-Abuse-Report</p> <p data-bbox="229 568 1508 676">The PREA Office reviews data collected and aggregated in order to assess and improve the effectiveness of sexual abuse prevention, detection, policies, practices, and training. The review of data encompasses identifying problem areas and taking corrective action on an ongoing basis. The agency has an annual report, including corrective actions for the facilities.</p> <p data-bbox="229 676 1508 878">The agency's annual report includes a comparison of the current year's data and corrective actions with those from prior years and provides an assessment of the agency's progress in addressing sexual abuse. The agency's annual report is approved by the agency head and made readily available to the public through the agency's website. The agency identifies 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. ECI provided a copy of the PREA Audit Report for 2019. Compliance with this standard was also determined by a review of policy/documentation and staff interviews.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The auditor received five (5) correspondence from offender prior to the audit. Three of the offenders were housed at the facility during the onsite audit. The offender were interviewed. The offenders were concerned about correctional, or facility polices not related to PREA but conditions of confinement. This information was shared with the Captain as the Warden was not available during the close out due to illness. The auditor was provided a roster for all inmates. Inmates in the target group rosters as well as housing roster for all inmates. The inmates and staff interviews were conducted in a private office with no monitoring equipment located in this area. While conducting the tour staff were mindful of the auditors need to talk to resident and staff and provided appropriate privacy to talk to inmates and staff. Specialized staff such as Intake Officer, Restrictive Housing Unit Manager were interviewed in a private office during the tour of the facility.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The last audit at Eastern Correctional Institution was conducted on December 8, 2016. The auditor reviewed the report and found it to meet the requirements of the standards. The report can be found on NCDPS website or by Google Search.

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.)	na
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.)	na

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

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

115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.15 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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

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

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

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

115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes

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

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

115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes
115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	no

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

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

115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
115.43 (c)	Protective Custody	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
115.43 (d)	Protective Custody	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
115.43 (e)	Protective Custody	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.51 (a)	Inmate reporting	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes

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

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

115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	na
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes

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

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

115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes

115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

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

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

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

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

115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na

115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.88 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes

115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	yes
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
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. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. 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, there has never been a Final Audit Report issued.)	yes