

# PREA Facility Audit Report: Final

**Name of Facility:** Charlotte County Jail Virginia

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 09/28/2020

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> LaWanda M. Long	<b>Date of Signature:</b> 09/28/2020

AUDITOR INFORMATION	
<b>Auditor name:</b>	Long, Lawanda
<b>Email:</b>	lawandamlong@aol.com
<b>Start Date of On-Site Audit:</b>	08/05/2020
<b>End Date of On-Site Audit:</b>	08/05/2020

FACILITY INFORMATION	
<b>Facility name:</b>	Charlotte County Jail Virginia
<b>Facility physical address:</b>	222 Law Lane, Charlotte Court House, Virginia - 23923
<b>Facility Phone</b>	
<b>Facility mailing address:</b>	

<b>Primary Contact</b>	
<b>Name:</b>	Melissa Tharpe
<b>Email Address:</b>	mtharpe@cchsheriff.com
<b>Telephone Number:</b>	4345425141

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Royal S. Freeman, Sheriff
<b>Email Address:</b>	rsfreeman@cchsheriff.com
<b>Telephone Number:</b>	4345425141

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

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	96
<b>Current population of facility:</b>	66
<b>Average daily population for the past 12 months:</b>	72
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>Which population(s) does the facility hold?</b>	Both females and males
<b>Age range of population:</b>	25-45
<b>Facility security levels/inmate custody levels:</b>	minimum,medium,maximum
<b>Does the facility hold youthful inmates?</b>	No
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	16
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	5
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	4

<b>AGENCY INFORMATION</b>	
<b>Name of agency:</b>	Charlotte County Sheriff's Office
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	222 Law Lane , Charlotte Court House, Virginia - 23923
<b>Mailing Address:</b>	
<b>Telephone number:</b>	434-542-5141

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

Agency-Wide PREA Coordinator Information			
<b>Name:</b>	Melissa Tharpe	<b>Email Address:</b>	mtharpe@cchsheriff.com

## 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.

LaWanda Long, DOJ Certified PREA Auditor and Rose Durbin, PREA Consultant conducted the PREA audit for Charlotte County Jail on August 5, 2020, a total of twenty-five hours (25) hours were spent on-site, twelve and a half hours for each. The audit began with the notification of the on-site audit that was posted by June 19, 2020, six weeks prior to the date of the on-site audit. The facility's last PREA audit was on July 7, 2017. The posting of the notices was verified during the tour and via interviews with both staff and inmates. The notices were posted in various locations throughout the facility including the housing pods, sallyport into the housing areas, intake and booking. This auditor did not receive any communication from the staff or inmates resulting from the posting of the PREA Audit Notices. The Pre-Audit Questionnaire, policies, procedures, and supporting documentation for all forty-three (43) standards were uploaded to the Online Auditing System approximately four weeks prior to the audit. This auditor & consultant spoke with the PREA Coordinator in reference to the on-site visit and discussed the information the we needed upon arrival on the first day of the PREA Audit. Which included inmate rosters by housing unit, staff schedules for both shifts for the one (1) day on-site audit, a list of inmates identifying those with disabilities, Limited English proficiencies, LGBTI status, those with current allegations and prior reports of victimization. Prior to the audit, the schedule for the audit was forwarded to the facility for review and feedback.

The on-site audit began on the morning of August 5, 2020 @ 8:00 AM, with an entrance meeting with the PREA Coordinator and the Captain. During the entrance briefing, the audit process was discussed and a tentative schedule for entire day to include conducting staff and inmate interviews and reviewing the documentation.

A tour of the facility followed the entrance meeting. There is one main building on the property and within the secure perimeter of the facility. The auditor & consultant were provided access to view all areas of the building; Housing Unit 1 – Male General Population with ten (10) beds, shower and one toilet both with a curtain. The auditor and consultant did not go into the unit because the unit was on COVID-19 quarantine. However, we could observe the unit through the window. Housing Unit 2 – Male General Population with ten (10) beds, shower and one toilet, both with a curtain. Housing Unit 3 – Male General Population with thirteen (13) beds, shower and one toilet, both with a curtain. Housing Unit 4 – Male General Population with thirteen (13) beds, shower and one toilet, both with a curtain. Housing Unit 5 – Male General Population with 10 beds, 1 shower and one toilet with a curtain; Housing Unit 6 – Female General Population with 6 beds, L shaped unit with shared bathroom, one toilet and one shower with curtains. Housing Unit 7 – Work Release/Trustee with 36 beds, camera in the entryway, 3 showers, 2 toilets, all have curtains.

During the tour, inmates were observed to be under constant supervision of the staff while involved in various activities. The facility was well maintained. Notification of the PREA Audit was posted in all locations throughout the facility as well as postings informing inmates of the instructions to dial #8. Also, during the tour, this auditor observed announcements being made when opposite gender staff entered in

the housing unit. Cameras and a video surveillance system enhance their capabilities to assist in monitoring blind spots and the review of incidents. Additionally, there were no cameras installed in the shower/toileting area, so inmates are not seen on the surveillance system while showering or toileting.

During the tour, the auditor and consultant reviewed the cameras located in the control room. There were sixteen cameras viewed. The two holding cells with toilets, the camera for the holding cells have a digital black box over the toilet area preventing viewing opposite gender viewing.

During the day of the site review, there were a total of fifty-four (54) inmates assigned to the facility. Twenty-two (22) inmates were randomly selected, from all housing units, with the exception of the quarantine housing unit, from the inmate list provided by the PREA Coordinator on the morning of August 5, 2020, for the interview process. There were no inmates in the targeted categories outlined in the PREA Auditors Handbook, assigned to Charlotte County Jail. Therefore, all twenty-two inmates were randomly selected.

Inmate interviews indicated they were well informed of their right to be free from sexual abuse and sexual harassment and how to report sexual abuse and sexual harassment using several ways of communication such as trusted staff, administrative staff, and the hot line (#8). The community victims' advocacy service and telephone number is available to the inmates and can be accessed via option 2 of the hotline. The Piedmont Crisis Center agrees to provide confidential crisis intervention and emotional support services related to sexual abuse or sexual assault for to Charlotte County Jail victims. Also, this auditor contacted the representative from the Piedmont Crisis Center via telephone during the post audit phase and confirmed they would provide emotional support services to inmates to Charlotte County Jail.

Thirteen (13) staff were formally interviewed including staff from both shifts (supervisory and line staff).

The following interview categories were covered: medical staff, incident review, PREA coordinator, monitoring for retaliation, upper level management, human resources, investigator, risk screening, intake staff, volunteer, contractor, Warden or designee and agency head. Overall, the interviews revealed the staff are very knowledgeable of the PREA standards and were able to articulate their responsibilities and their mandated duty to report.

At the end of the day @ 9:00 PM, an exit briefing with a summary of the findings was conducted with the Captain and PREA Coordinator. Prior to the exit debriefing additional supporting documents were provided to the auditor and the PREA Coordinator answered questions that the auditor and consultant had from the review of the documentation uploaded during the PREA audit phase. Clarification and additional documentation was provided by the PREA Coordinator and uploaded by the auditor to the online audit system. At the exit debriefing, it was discussed that a finding could not be given at this time, both the auditor and consultant would have to review the documentation provided, information received from both staff and inmate interviews and possibly request additional documentation. The auditor and consultant shared with the PREA Coordinator that they didnot see any areas that they were overly concerned about. However, during inmate interviews it was clear that the inmates were unclear of the services offered for emotional support and additional education would be required during the post audit phase. The auditor requested additional samples of documentation for all standards from January 2020 - May of 2020. The facility previously provided samples of documentation from January 2019- December 2019. This documentation was provided promptly while on site and during the post audit phase. Through intensive review of documentation, observation during the site review, staff and inmate interviews and follow-up questions this auditor was able to confirm full compliance with the PREA Standards.

## 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.

Charlotte County Jail is located at 222 Law Lane, Charlotte Court House, Virginia, 23923.

The Charlotte County Jail and Sheriff's Office are contained in a one-story brick building. There are a total of seven (7) Housing Units/Cell blocks and one (1) isolation cell, including the work release program. The Charlotte County Jail houses all classification levels of male and female inmates, pre-trial and post-trial inmates. The Charlotte County Sheriff's Office operates the Charlotte County Jail.

The mission of the Charlotte County Sheriff's Office is to provide appropriate supervision of persons incarcerated in the jail, to meet their basic human needs, and when possible, to make available programs which will promote a positive attitudinal and behavioral climate in the jail. The primary goals of the Charlotte County Jail is to: protect the Commonwealth by safekeeping persons incarcerated in the jail; provide a safe and humane environment for both jail the jail staff to develop and maintain a professional demeanor by providing training in all phases of law enforcement on an ongoing basis; provide appropriate inmate programs which are beneficial to both the community and the participants; develop community involvement in, and increased public awareness of, the proper role and function of the jail; and to increase staff understanding and commitment to the jail's mission, goals, and objectives.

The Sheriff's Office is accredited by the Virginia Law Enforcement Professional Standards Commission (VLEPS). The Charlotte County Jail received a compliance rating of 100% from the Virginia Department of Corrections' (DOC) for their annual Life, Health, and Safety (LHS) unannounced inspection in 2009, 2011, 2012, 2014, 2015, 2017 and the three year audits of 2010, 2013 and 2016. The Charlotte County Jail has nine consecutive 100% compliance ratings from the Virginia Department of Corrections.

## AUDIT FINDINGS

### Summary of Audit Findings:

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

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

Number of Standards Exceeded: 0  
Number of Standards Met: 45  
Number of Standards Not Met: 0  
Summary of Corrective Action (if any) NA

## **Standards**

### **Auditor Overall Determination Definitions**

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

### **Auditor Discussion Instructions**

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

115.11	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Mandates the purpose of this procedure is to establish “Zero Tolerance” uniform guidelines and operating procedures for the jail concerning the sexual abuse of inmates in accordance with national standards as required by Public Law 108-79, The Prison Rape Elimination Act of 2003. The policy outlines the jails approach to preventing, detecting, and responding to such conduct.</p> <p>The CCJ will not tolerate sexual assault, abuse, misconduct or harassment towards inmates by staff, contractors, volunteers, or other inmates. The CCJ actively works to prevent, detect, report, and respond to any violation. Every allegation of sexual assault, abuse, misconduct, and harassment will be thoroughly investigated.</p> <p>The facility's policy outlines how it will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. Prevention includes Inmate Training, Staff and Contractor/Volunteer Training, Staff, Contractor, and Volunteer Screening. Youthful inmates' placement, Inmate Screening, Cross-gender Viewing and Searches and Supervision and Monitoring. Detection and Responding/Reporting includes Inmates Responsibilities, Staff Responsibilities, Response, Investigation, Discipline, Protection against Retaliation and Ongoing Medical and Mental Health Care.</p> <p>The policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment that are in accordance with the PREA standards as well as sanctions for those found to have participated in prohibited behaviors. In accordance with CCJ PREA policy, any behavior of a sexual nature between staff and inmates is prohibited. Staff is subject to disciplinary action up to and including termination for violating sexual misconduct under the Charlotte County Sheriff's Office Policy Manual Rules and Regulations 1.7 Category III Offense, as well as criminal prosecution under the Code of Virginia. Termination will be the presumptive disciplinary action for staff who has engaged in sexual abuse. Disciplinary actions for violations of policies relating to sexual abuse or sexual harassment will be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and actions imposed for comparable offenses by other staff with similar histories. All termination or resignations by staff that would have been terminated for violations of sexual abuse or sexual harassment policies will be reported to law enforcement agencies and to any relevant licensing bodies. Any behavior of a sexual nature by inmates is prohibited and subject to disciplinary action per the Charlotte County Jail Standard Operating Procedures Policy, as well as criminal prosecutions.</p> <p>In accordance with Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, CCJ has designated an agency-wide PREA coordinator to work with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in its jail. The PREA coordinator position is held by the Administrative Assistant to the Sheriff. She reports directly to the Sheriff. In this position, she is responsible for coordinating the jail's PREA efforts in conjunction with the requirements of the PREA standards, maintaining necessary documentation of PREA standard compliance efforts, acts</p>

as the primary jail contact for the PREA reporting, ensures compliance with all PREA related departmental, and/or governing authorities policies/procedures, and provides regular feedback to the Sheriff and Captain concerning policies, procedures, or practices that are not in compliance with PREA standards. During the interview conducted during the site review the PREA Coordinator confirmed that she has sufficient time to manage her PREA responsibilities.

Charlotte County Jail does not operate more than one facility, therefore the designation of a PREA compliance manager is not required in accordance with the standard.

Confirmation was received during the interviews of random and specialized staff and inmate interviews that the administration has taken the PREA Standards very seriously. During the tour of the facility, PREA posters were observed and PREA documentation was visible throughout the facility, creating a PREA compliant culture. Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.

<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Based both the review of documentation and the interviews conducted during the site review with the Sheriff and PREA Coordinator, Charlotte County Jail has neither entered nor renewed any contracts for the confinement of inmates after August 20, 2012. Therefore, the facility has demonstrated compliance with this standard.

115.13	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>In accordance with Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Supervision and Monitoring, "The CCJ will develop, document, and make the best efforts to comply on a regular basis with a staffing plan that provides adequate levels of staffing to protect inmates against sexual abuse." If the staffing plan is not complied with, it will be documented and justified for all deviation from the plan. Annually the CCJ will assess, determine, and document whether adjustment is needed to the staffing plan, the video monitoring system, and the resources that the jail has available to commit to the staffing plan.</p> <p>CCJ staffing plan allocates the following position that provides for adequate levels of staffing for the operation of the jail to protect inmates against abuse; Captain (1), Lieutenant (1), Sergeant (1) and Deputies (11).</p> <p>During the site review an interview was conducted with the Sheriff in which he confirmed that the staffing plan is reviewed annually and the following areas are discussed during the review process: adequate levels of staffing, video monitoring, detention and correctional practices, judicial findings of inadequacy to include federal investigative agencies and internal or external oversight bodies. The Sheriff confirmed that the physical plant layout is also included, identifying blind spots and areas that both inmates and staff may be isolated. Additional factors that were also confirmed via the Sheriff's interview and the review of the staffing plans for both 2019 and 2020, were the composition of the inmate population, number of supervisor staff, institutional programs on various shift, applicable State and or local laws, regulations or standards. CCJ did not have any sexual abuse or sexual harassment allegations during the audit period. However, both the Sheriff and Captain confirmed that they would use information from both substantiated and unsubstantiated incidents of sexual abuse and any other relevant factors deemed necessary in ensure that adequate staffing is maintained within CCJ.</p> <p>In accordance with the standards in circumstances where the staffing plan is not complied with, the facility documents and justifies all deviations from the plan. Per supporting documentation and interview with the Sheriff there have been no deviations from Charlotte Count Jail staffing plan within the past 12 months.</p> <p>In accordance with Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Unannounced and irregular rounds through the jail will be made by the Jail Sergeant, Lieutenant, or Captain and will occur on day shift as well as night shift to identify and deter staff sexual abuse and sexual harassment. Jail staff is prohibited from alerting other staff members of these rounds unless it is related to operational functions. These rounds are to be documented in the Jail Daily Log. Monthly supporting documentation from January 2019 thru December 2019 was provided during the pre-audit phases confirming that unannounced rounds are made daily on both shift by sergeants and above. Additional documentation for January thru May 2020 was requested, received, and reviewed by the auditor.</p> <p>Based on the review of the agency policy, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this</p>

standard.

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	This standard is Non-Applicable. The PREA Coordinator and the Captain confirmed the facility does not house youthful inmates.

115.15	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Cross-gender Viewing and Searches, Employees will not conduct cross-gender strip searches or cross-gender visual body cavity searches (anal or genital opening). A staff member of the same sex will search and visually inspect every inmate upon being placed in population. Intersex, gender non-conforming and transgender inmate searches will be done in a professional and respectful manner consistent with security needs.</p> <p>Searches may be conducted by medical staff; by asking the inmate to identify the gender of staff with whom they would feel most comfortable conducting the search; conducted in accordance with the inmate’s gender identity. Inmates will be able to shower, perform bodily functions and change clothes without non-medical staff of the opposite sex viewing them, unless in exigent circumstance or when such viewing is incidental to routine cell checks.</p> <p>The auditor made a recommendation to CCJ that the policy should be updated using the term of gender instead of sex. The policy was updated to include the following language, “A staff member of the same gender will search and visually inspect every inmate upon being placed in population.” CCJ staff were very open to the dialogue regarding the usage of gender verses sex. The auditor provided the PREA Coordinator with guidance from the PRC. The updated policy was communicated to all staff during the post audit phase. Each employee of CCJ signed acknowledging that received the updated information and understood.</p> <p>Supporting documentation confirmed there have been no cross-gender strip or cross-gender visual body cavity searches conduct on inmates at CCJ. Such searches are prohibited.</p> <p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy, mandates inmates will be able to shower, perform bodily functions and change clothes without non-medical staff of the opposite sex viewing them, unless in exigent circumstance or when such viewing is incidental to routine cell checks. Under these circumstances staff of the opposite gender will “knock and announce” their presence before entering an inmate housing unit.</p> <p>Random staff and inmate interviews indicated that staff of the opposite gender very rarely enter the housing units. But if the opposite gender enters the housing units the same gender staff makes the announcement and ensures that everyone is completely dressed prior to the opposite gender entering. This practice was observed during the facility tour. This auditor recommended during the facility tour that the deputies making the gender announcement, document the announcement being made. The auditor’s recommendation was openly accepted by the administration, while the standard does not require the announcement be document, this would be a best practice consistently showing the practice is occurring. A review of the training documentation and staff interviews confirmed staff training on pat down searches, cross-gender pat searches and searches of transgender and intersex offenders are conducted in a respectful and professional manner. All staff are trained on searches at the Central Virginia Criminal Justice Academy and are required to complete the on-line PREA training every two years. During staff interviews, all staff confirmed that cross gender pat search are not allowed, and pat down searches were always performed by same gender staff.</p>

Staff were able to articulate what an exigent circumstance would be and were aware that only medical staff could perform body cavity searched. Interviews conducted with random female inmates confirmed that they are always pat searched by female staff and are never prohibited from attending programs because a female staff is not available to pat search them.

Random staff and inmate interviews confirmed inmates are able to shower, perform bodily functions and change clothing without non-medical staff of the opposite gender viewing them. Staff interviews could identify policy on prohibiting staff from searching or physically examining a transgender or intersex offender for determining inmate's genital status. According to supporting documentation, there have been no cross-gender pat down searches, cross-gender strip or cross-gender visual body cavity searches of inmates conducted at the facility in the past twelve (12) months for the sole purpose of determining an inmate's genital status. In addition, there have been no exigent circumstances of cross-gender pat down, strip or visual body cavity searches of inmates conducted at the facility in the past twelve (12) months.

Based on the review of the agency policy, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.

115.16	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires reasonable accommodations will be made on a case-by-case basis for inmates who have limited English speaking abilities, are hearing or visually impaired and have limited reading skills, or otherwise disable to provide effective communication to ensure equal opportunities to benefit from the jail's efforts to prevent, detect, report and respond to sexual abuse and sexual harassment. Inmate interpreters, inmate readers or other assistance by inmates will be prohibited except in limited circumstances. Charlotte County Jail is not required to take actions that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under Title II of the Americans With Disabilities Act, 28 CFR 35.164. In addition to providing such education, the jail will ensure that key information is continuously and readily available or visible to inmates through posters and other written formats. Charlotte County Jail has entered into a Letter of Understanding with Nora Brooks, Interpreter on October 3, 2013 for services of Sign Language Translation and Video Remote Interpreting Services.</p> <p>The Agency has created a PREA flyer for the purposes of educating offenders on the Prison Rape Elimination Act, which includes information on zero tolerance policy, the inmates right to be free from sexual abuse and sexual harassment and how to report which are posted in each housing unit. The flyer is available in English and Spanish (the most common non-English language in the Agency).</p> <p>Random staff interviews indicated the PREA education is provided in a manner to ensure the inmate comprehends the material. Intake staff confirmed that PREA information is provided upon the inmate's arrival. If the inmate advises staff or the intake staff determine that the inmate has a disability appropriate steps are taken to ensure that the inmate can understand the PREA information provided. Intake staff confirmed during their interviews that they read the information to the inmates.</p> <p>During the site review the auditor observed the intake process, while the deputy was processing a female inmate into the jail. The intake process included both the assessment and inmate PREA education.</p> <p>During the facility tour, this auditor observed the PREA postings throughout the facility in English and Spanish, including the #8 access posted on the bulletin boards located in each housing unit.</p> <p>Based on the review of information obtained through staff interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.17	<b>Hiring and promotion decisions</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1469 701">A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, confirms Charlotte County Jail will not hire or promote anyone or enlist the services of any contractor, who may have contact with inmates, that: Have engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility or other institution; Have been convicted of engaging or attempting to engage in sexual activity in the community facilitated by overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; Have been civilly or administratively adjudicated to have engaged in sexual activity; The jail will consider any incidents of sexual harassment in determining whether to hire, promote, or enlist services.</p> <p data-bbox="252 745 1481 1160">A background investigation with a criminal history record investigation (e.g. VCIN); will be conducted on prospective staff for the Charlotte County Jail and on volunteers and contractors that may have contact with inmates to ensure against the hiring of any person with a history of perpetrating sexual assault, abuse, misconduct, or harassment, and will be rechecked every 5 years of those that may have contact with inmates starting in 2013 on current employees, volunteers, and contractors. All applicants and staff who may have contact with inmates will be asked directly about previous misconduct in all written applications, interviews for hiring or promotion, or during written evaluations. The Charlotte County Jail will make its best effort to check with all prior institutional employers for information on allegations of sexual misconduct or sexual abuse.</p> <p data-bbox="252 1205 1481 1529">Staff must disclose any such misconduct. Any material omission or false information regarding misconduct will be grounds for termination. The jail will provide information on substantiated allegations of sexual abuse or sexual harassment involving a former staff member upon receiving a request from an institutional employer for whom such staff member has applied to work, unless prohibited by law. The Captain who serves as the Human Resources representative for the agency maintains a master list of all employees and contractors. The agency provided the master list to the auditor for review and no background check older than 4 years was found within the document.</p> <p data-bbox="252 1574 1481 1910">During the interview with the Human Resource representative it was confirmed that all staff are required to submit their acknowledgement of their duty to disclose any previous misconduct and have a continuous duty to report acts of sexual assault, sexual abuse, sexual misconduct, or sexual harassment. She reported that background checks are conducted at least every five (5) years, at hire, and at promotion, a Driver's License check is conducted annually, and they will release prior employment information with a signed authorization by the former staff. A review of random staff files found that backgrounds were conducted within the past 3 years.</p> <p data-bbox="252 1955 1481 2067">Based on the review of the agency policy and procedures, observations and information obtained through staff interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Charlotte County Jail has not acquired any new facilities or made any substantial expansions or modifications of existing facilities since August 20, 2012. Nor has the jail installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012.</p> <p>During two separate interviews conducted with the Sheriff and Captain it was confirmed that Charlotte County Jail has not made any upgrades to the facility during this audit period. However, should the Charlotte County Jail design or acquire any new facilities or plan any substantial expansion or modification of existing facility, the agency shall consider the effect of the design, acquisition, expansion, or modification to protect inmates from sexual abuse. Per the Sheriff, Charlotte County Jail would also take in consideration when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, how such technology would enhance the jail's ability to protect inmates from sexual abuse.</p> <p>Based on observations and information obtained through staff interviews, and review of documentation the facility has demonstrated compliance with this standard.</p>

115.21	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>CHARLOTTE COUNTY SHERIFF'S OFFICE GENERAL ORDERS, COLLECTION/PRESERVATION OF EVIDENCE, 2-15 (rev 2014): Requires proper documentation, collection, preservation, and submission of physical evidence to forensic laboratories may provide the key components of any investigation. The crime scene is usually the starting point of a criminal investigation. Through evidence located at the scene, suspects are developed or eliminated, investigative leads are established, and theories concerning the crime are substantiated or disproved. The officer or investigator must always be aware that any physical evidence collected might someday have to be presented in court. Therefore, it is imperative that each officer carefully process a crime scene not to overlook, contaminate, or destroy evidence. Physical evidence appears in many shapes, sizes, and forms, thereby necessitating various recovery, preservation, and submission techniques. The officer or investigator shall be prepared to collect, identify, and package the evidence, in accordance with the guidelines provided by the Division of Forensic Science, so that it will not be changed in form and value when it reaches the laboratory. The officer collecting the evidence shall maintain a chain of custody of that evidence in order to ensure that it is presented to the court professionally and in compliance with the law.</p> <p>CHARLOTTE COUNTY SHERIFF'S OFFICE GENERAL ORDERS, PROPERTY/EVIDENCE CONTROL, 2-16 (rev 2014): Requires that all evidence and property recovered or turned into this agency be properly packaged, handled, recorded, stored, and accounted for. All personnel shall maintain strict accountability for all property held as property and evidence. In no way shall these policies and procedures be interpreted to supersede any federal or state statute. These policies and procedures are intended to comply with existing laws.</p> <p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date:01-01-2020, Mandates Charlotte County Jail will ensure that an investigation be done on all allegations of sexual abuse and sexual harassment. Allegations involving potentially criminal behavior will be turned over to the Charlotte County Sheriff's Office for investigation. The jail will attempt to make available to the victim an advocate from an outside source to accompany and support the victim through the forensic medical examination process, investigatory interviews and for emotional support, crisis intervention information, and referrals through the use of a mailing address and hotline number for outside emotional support services related to sexual abuse. Reasonable communication will be allowed between inmates and an outside advocacy group in as confidential manner as possible. Charlotte County Jail will have a written plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health, investigators, and jail administration. The plan is as follows: Staff Responsibilities:</p> <ol style="list-style-type: none"> <li>a. Isolate the victim and preserve the crime scene.</li> <li>b. Segregate and isolate alleged perpetrator(s).</li> <li>c. Notify supervisor immediately of event. (If non-staff notify staff immediately.)</li> </ol>

- d. If the incident warrants a time frame that physical evidence could be collected, request the victim and abuser to not take action that would destroy it. (showering, eating, brushing teeth, changing clothes, urinating, defecating, smoking, or drinking)
- e. Ensure that the alleged abuser does not take actions to destroy any physical evidence. (showering, eating, brushing teeth, changing clothes, urinating, defecating, smoking, or drinking)
- f. Secure the crime scene if possible, under safety, security, and control of the facility.
- g. Document events by Incident Report.
- h. If no medical or mental health is on duty at the time of a report, immediately notify Medical/Mental Health "On Call" Personnel if needed. 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 victim pursuant and shall immediately notify the appropriate medical and mental health practitioners. Supervisor responding to scene shall:
  - a. Ensure that the staffs' actions have been met.
  - b. If the perpetrator is a staff member, he or she will be placed on administrative leave until investigated.
  - c. Immediately question the victim to determine the suspect or suspects, where or when the assault occurred and if facts warrant further investigation.
  - d. Ensure crime scene is preserved. Photos will be taken of the crime scene and/or victim and documentation made.
  - e. Inmate 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 there is indication of sexual assault, the victim will be transported to the local Emergency Room for further treatment, examination, documentation, collection of forensic evidence, testing for sexually transmitted diseases and access to emergency contraceptives. This treatment will be of no cost to the inmate.
  - f. Direct staff as needed to maintain control.
  - g. Notify Administration, PREA Coordinator and Investigator if the allegation involves potential criminal behavior. The investigator will ensure that to the extent the agency is responsible for investigating allegations of sexual abuse, the agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol shall be developmentally appropriate for youth where applicable, and, as appropriate, shall be 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.
  - h. Obtain feedback.
  - i. Ensure that upon return from emergency medical services the inmate is interviewed for

protective custody needs.

j. Ensure that follow-up medical and mental health service needs are arranged.

k. The Investigator responding will follow the Charlotte County Sheriff's Office Policy Manual General Orders

Cooperative Agreement between Young Men's Christian Association of Central Virginia, Forensic Nurse Examiners at Lynchburg General Hospital and Charlotte County Jail. This agreement went into effect initially in 2013 and remains in effect. Young Men's Christian Association of Central Virginia will provide 24-hour accompaniment services, crisis intervention, safety planning, forensic exam accompaniment, and criminal justice advocacy to victims of sexual violence.

A review of the MOU with Southside Center for Violence Prevention, Inc., and Piedmont Crisis Center went into effect initially in 2013 and still remains in effect. Southside Center for Violence Prevention, Inc., and Piedmont Crisis Center provides staff support, advocacy, and other appropriate services to victims of sexual assault and/or family members of victims referred by Charlotte County Jail, upon request of the victim. According to the MOU with Southside Center for Violence Prevention, Inc., and Piedmont Crisis Center shall have sexual assault victim advocates available for twenty-four-hour crisis intervention, emergency medical and legal advocacy, and support services. All services can be accessed through the twenty-four-hour telephone hotline. In the past 12 months, there have been no allegations where a victim required a forensic medical examination or victim advocate.

Charlotte County Jail confirmed inmates who require a forensic examination will be transported to Lynchburg General Hospital where trained and certified Forensic Nurse Examiners conduct SAFE exams.

Based on the review of the agency policies, observations, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.

<b>115.22</b>	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail, Prison Rape Elimination Act (PREA) Policy, (rev 2020): Requires an investigation be done on all allegations of sexual abuse and sexual harassment. Allegations involving potentially criminal behavior will be turned over to the Charlotte County Sheriff's Office for investigation.</p> <p>During the interview conducted with the Investigator, it was confirmed there have not been any reported allegations of sexual abuse or sexual harassment. However, the Charlotte County Sheriffs Office would conduct investigations into all allegations of sexual abuse and sexual harassment involving staff or inmates. The Investigator confirmed that he would consult and refer to the Virginia State Police in cases that were criminal in nature.</p> <p>During the pre-audit phase it was noticed by the auditor that the updated PREA policy was not posted on Charlotte County Sheriff's Office webpage. The PREA Coordinator ensured during the post audit phase the webpage was updated reflecting Charlotte County Jail, Prison Rape Elimination Act (PREA) Policy, (rev 2020).</p> <p>Based on the review of the agency policies, observations and information obtained through random staff and specialized staff interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.31	<b>Employee training</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1474 875">A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Staff and Contractor/Volunteer Training, requires all staff will receive basic orientation to include at a minimum: The jail's zero tolerance policy. Sexual abuse/assault detection, prevention, response, and reporting procedures. Inmates and staff rights to be free from sexual abuse/assault and sexual harassment. Staff and inmate's right to be free from retaliation for reporting. The dynamics of sexual misconduct in confinement. The common reactions of sexual misconduct victims, how to detect and respond to signs of threatened and actual sexual misconduct. Avoiding inappropriate relationships with inmates. Effective and professional communication with LGBTI inmates. How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. All staff will receive initial training and refresher training every 2 years. In years in which an employee does not receive refresher training, the agency shall provide refresher information on current sexual abuse and sexual harassment policies through policy review.</p> <p data-bbox="252 913 1453 1077">New employees are required to attend Basic Jailor Training, which includes a 4-hour PREA class. The Central Virginia Criminal Justice Academy curriculum was reviewed and all of the required training components of the PREA Standard was included in the training received by employees.</p> <p data-bbox="252 1115 1453 1361">A review of the staff training documentation and staff interviews confirmed that staff receive PREA training through the Central Virginia Criminal Justice Academy every two years and review of the PREA policy as a refresher every other year and when there are updates. All employees were able to clearly articulate their knowledge of PREA and their duty to prevent, detect and respond to sexual abuse and sexual harassment allegations. It was clear to the auditor that staff understood the training they received.</p> <p data-bbox="252 1400 1474 1646">Documents reviewed showed that online training through the Central Virginia Criminal Justice Academy was completed for the selection of staff interviewed in 2017 and 2019. The policy review for 2020 had not occurred prior to the site review. During the report writing phase the PREA Coordinator provided the auditor supporting documentation confirming that all staff had reviewed the updated PREA policy and understood the updates, meeting the training requirement detailed in the standard.</p> <p data-bbox="252 1684 1481 1767">During random inmate interviews they indicated that staff took PREA allegations very seriously and they felt safe reporting allegations of sexual abuse and sexual harassment.</p> <p data-bbox="252 1805 1461 1968">Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and the review of detailed documentation during the on-site visit and facility tour, and follow-up the facility has demonstrated compliance with this standard.</p>

<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Staff and Contractor/Volunteer Training, requires all staff will receive basic orientation to include at a minimum: The jail's zero tolerance policy. Sexual abuse/assault detection, prevention, response, and reporting procedures. Inmates and staff rights to be free from sexual abuse/assault. Staff and inmate's right to be free from retaliation for reporting. The dynamics of sexual misconduct in confinement. The common reactions of sexual misconduct victims. How to detect and respond to signs of threatened and actual sexual misconduct. Avoiding inappropriate relationships with inmates. Effective and professional communication with LGBTI inmates. How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.</p> <p>This facility reported four (4) volunteers and contractors who may have access to offenders. The auditor reviewed all four (4) volunteer and contractor signed training documentation, confirming they received and understood the training received.</p> <p>Interviews with a contractor and a volunteer, confirmed their knowledge of the required PREA training and Charlotte County Jail zero tolerance of any form of sexual activity at the facility as well as their duty to report sexual abuse or sexual harassment. Both individuals confirmed they would report this information to the deputies immediately.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through the volunteer and contractor interviews and documentation, the facility has demonstrated compliance with this standard.</p>

115.33	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="248 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="248 327 1485 999">Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Prevention, Inmate Training; New inmates will receive training during intake on the jail's "zero tolerance" policy and reporting incidents. After intake, but no later than 30 days, new inmates will receive training on their rights to be free from sexual abuse and the right to be free from retaliation for reporting. Current inmates will receive such training within one year of the PREA Standards effective date. Transfer inmates shall receive such training, as jail policies can differ. Reasonable accommodations will be made on a case-by-case basis for inmates who have limited English speaking abilities, are hearing or visually impaired and have limited reading skills, or otherwise disabled to provide effective communication to ensure equal opportunities to benefit from the jail's efforts to prevent, detect, report and respond to sexual abuse and sexual harassment. Inmate interpreters, inmate readers or other assistance by inmates will be prohibited except in limited circumstances. CCJ is not required to take actions that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under Title II of the Americans With Disabilities Act, 28 CFR 35.164.</p> <p data-bbox="248 1043 1469 1155">In addition to providing such education, the jail will ensure that key information is continuously and readily available or visible to inmates through posters and other written formats. All training will be documented confirming that the training was received and understood.</p> <p data-bbox="248 1200 1390 1267">The auditor observed PREA handouts in both English and Spanish. Posters and inmate brochures are posted in the housing areas in formats accessible to all inmates.</p> <p data-bbox="248 1312 1485 1603">Charlotte County Jail Rules and Regulations Handbook contains information about the zero-tolerance policy towards sexual assault, sexual abuse, sexual harassment, or sexual misconduct of any inmate incarcerated within the Charlotte County Jail. The handbook contains specific information on Prison Rape Elimination Act, PREA Hotline, Strategies to avoid sexual abuse/assault, Agency Zero Tolerance Policy, Other ways to report, Emotional Support Services and how to access, Victim Advocates and how to access Piedmont Crisis Center, P.O. Box 487, Blackstone, VA 23824.</p> <p data-bbox="248 1648 1469 1895">Intake staff interview confirmed that the information is provided initially on the first day of an inmate's arrival at the jail. Inmates are shown the PREA Educational Video and sign acknowledging that the PREA training was provided. Inmates are afforded the opportunity to ask staff any questions they may have regarding PREA prior to signing the acknowledgment form. The auditor was provided with samples of inmate training for a one (1) year period prior to the site review.</p> <p data-bbox="248 1939 1477 2096">This auditor reviewed twenty-two (22) inmate files to ensure that comprehensive PREA training was being provided in accordance with the PREA standard. Review of supporting documentation confirmed that comprehensive training was provided for all twenty-two inmates during the intake process.</p>

Based on the review of the agency policy, observations and information obtained through staff interviews, inmate interviews and review of documentation, the facility has demonstrated compliance with this standard.

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Charlotte County Jail, Prison Rape Elimination Act (PREA) Policy, -Effective Date: 01-01-2020, Requires Investigative Training to include training provided to employees as well as specialized training in conducting sexual abuse investigations in confinement settings. Specialized Training for Investigators was an eight (8) hour class held by the Training Force USA on September 30, 2013, titled, Prison Rape and Sexual Assault Investigations inside Correctional Facilities. Topics covered included techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.</p> <p>The facility provided proof of two (2) facility investigator trainings that were conducted as required. In an interview with the Investigator he confirmed completion of the required specialized investigator training through Training Force USA in addition to the PREA education online training and refresher policy review. The investigator indicated the specialized investigation training consisted of interviewing techniques, Miranda warnings, Garrity warnings, sexual abuse evidence collection, and the criteria and evidence to substantiate a case for administrative or prosecution referral.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews, and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.35	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Charlotte County Jail, Prison Rape Elimination Act (PREA) Policy, -Effective Date: 01-01-2020, Requires that all medical and mental health care providers receive training on the level of care provided. At minimum, medical and mental health care providers that have contact with inmates will receive training on the jails zero tolerance policy and how to detect and report allegations of sexual abuse and sexual harassment. Mediko and Crossroads Community Service Board, by contract, will be responsible for the training of their staff. Forensic examinations will be conducted in an emergency room facility by Sexual Assault Forensic Examiners or Sexual Assault Nurse Examiners, not by the medical staff at CCJ. If SAFEs or SANEs cannot be provided, the examination can be done by other qualified medical practitioners and will be documented of efforts made.</p> <p>Charlotte County Jail only employs one full-time medical staff which is a Nurse. All other medical needs are handled by the medical contractor Mediko or the inmates are taken to the local hospital. Charlotte County Jail does not employ full- or part-time mental health care practitioners who work regularly in its facility. All mental health services would be provided by Crossroads Community Service Board via tele-network.</p> <p>The medical staff at the facility does not conduct forensic examinations. The facility provided completed certificates for medical staff specialized training through the National Institute of Corrections (NIC) website, as well as online PREA training through the Central Virginia Criminal Justice Academy. During the Interview with medical staff he confirmed that he did receive specialized training, as well as online PREA training. Specialized training included detecting and assessing for signs of sexual abuse and sexual harassment, preservation of evidence, responding effectively and professionally to victims of sexual abuse and sexual harassment, and to whom to report allegations or suspicions of sexual abuse or sexual harassment. During the interview it was also communicated by the medical staff that forensic examinations will be conducted at Lynchburg General Hospital by a SAFE or SANE practitioner and anything related to PREA or policy. Any policy violation would be reported to the PREA Coordinator, Captain, or PREA Investigator.</p> <p>The auditor and consultant attempted to contact the Community Service Board while onsite and during the report writing process. However, due to COVID-19 the emergency crisis hotline is the only service currently available. The PREA Coordinator confirmed the Community Service Board has never been utilized since the process has been but into place, however they would speak with the inmate via tele-network shall the need arise.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<p data-bbox="248 168 898 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="248 248 523 284"><b>Auditor Discussion</b></p> <p data-bbox="248 329 1477 875">A review of Charlotte County Jail, Prison Rape Elimination Act (PREA) Policy, -Effective Date: 01-01-2020, Requires inmates be assessed during intake for risk of being sexually abused by other inmates or being sexually abusive towards other inmates by using an objective screening instrument. Screening will take place within 72 hours after intake. Reassessment of risk will take place within 30 days based on additional information that is received or when warranted due to a referral, request, or incident of sexual abuse. Inmates will not be punished for refusal to answer screening questions. The intake screening will consider at the minimum the following: Whether the inmate has a mental, physical, or developmental disability; The age and physical build of the inmate; If the inmate has previously been incarcerated.; If the inmate has prior convictions for sex offenses; If the inmate has previously experienced sexual victimization; If the inmate is or is perceived to be gay, lesbian, bisexual, transgender, or intersexual; The inmate’s own perception of vulnerability; If the inmate is detained for civil immigration purposes and prior acts of sexual abuse and convictions for violent offenses.</p> <p data-bbox="248 913 1461 1249">In addition to interviewing the Intake Staff, the auditor and consultant observed the screening process being conducted during the facility tour. During the interview with the staff who conducts the risk screening, it was confirmed that all screening is conducted on the day the inmate arrives. Medical staff are present during the screening. A review of any prior information that the agency may have on the inmate is also reviewed. The screening that is conducted includes any disabilities, age, physical build, current and previous incarcerations, violent offenses, LGBTI status, mental illness, prior victimization, and assaultive behaviors. Additionally, inmates are asked about their perception of vulnerability.</p> <p data-bbox="248 1288 1485 1451">A review of the twenty-two (22) randomly selected inmates files was conducted. With an arrival date ranging from January 2017 – July 2020, PREA Screening Checklist confirmed the screening were conducted on the same day of arrival. Inmate interviews indicated during the intake process staff ask them the screening questions.</p> <p data-bbox="248 1489 1477 1780">Staff interviews confirmed that an initial screening is conducted within twenty-four (24) hours of the inmate’s arrival. The screening that is conducted includes any disabilities, age, physical build, current and previous incarcerations, personal history, violent offenses, non-violent offenses, LGBTI status, mental disabilities, prior victimization, and assaultive behaviors. Inmates are never disciplined for refusing to respond to or not disclosing complete information when screening is conducted. Referrals are made to medical or mental health at the time of the screening.</p> <p data-bbox="248 1818 1433 1937">All information relevant to the screening is only shared with staff on a need to know basis. Access to information is available only to the Sheriff, Captain, PREA Coordinator, Sergeant and Medical.</p> <p data-bbox="248 1975 1477 2094">There were no transgender inmates admitted to the facility within the past twelve (12) months, staff interviews confirmed consideration will be given to the inmate’s own views of their safety in placement and programming assignments if programming is available.</p>

Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.

115.42	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="252 246 526 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 1484 750">A review of Charlotte County Jail, Prison Rape Elimination Act (PREA) Policy, -Effective Date: 01-01-2020, Requires the jail use screening information to keep inmates separate that are at risk for sexual abuse from those that are at risk of being sexually abusive in cells, recreation, and programs available. Individualized determinations will be made to ensure the safety of each inmate. Screening information for transgender and intersex inmates will be used on a case-by-case basis of placement in cells to ensure the health and safety of such inmates. Their own views will be taken into consideration for placement. Reassessment will be done at least twice a year to ensure safety. Inmates will be given the opportunity to shower separately from other inmates. Lesbian, gay, bisexual, transgender, or intersex inmates will not be placed in dedicated facilities, units, or wings solely on the basis of such identification or status.</p> <p data-bbox="252 784 1484 1153">The PREA Coordinator and the intake staff interviews described the screening instrument. They were able to clearly articulate the screening and assessment process and how that information, along with information derived from medical, records reviews, conversations and observations, is used to determine an inmate’s appropriate placement, housing and bed assignments, as well as work, education, and program assignments with the goal of keeping all inmates safe and free from sexual abuse. It was also confirmed, an inmate’s risk level would be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate’s risk of sexual victimization or abusiveness.</p> <p data-bbox="252 1198 1484 1355">Additionally, it was communicated via staff that both the PREA standards and Charlotte County Jail prohibits the placement of gay, bi-sexual, transgender and intersex inmates being placed in a particular housing unit, beds or other assignments based solely on their identification.</p> <p data-bbox="252 1400 1484 1691">Screening information is completed during the intake process which occurs within 24 hours of arrival and the reassessment is conducted within thirty (30) days. A review of the twenty-two (22) randomly selected inmates files was conducted, with an arrival date ranging from January 2017 – July 2020. The PREA Screening Checklist confirmed the screenings were conducted on the same day of arrival and the reassessment was conducted between fourteen (14) and sixteen (16) days. Inmate interviews indicated during the intake process that staff did asked them the screening questions upon arrival, then again about two (2) to three (3) weeks later.</p> <p data-bbox="252 1736 1484 2150">The PREA Coordinator communicated during her interview that any inmate determined to be at high risk for sexual victimization would be housed in separate housing units from inmates identified as being at high risk sexual aggressor. The auditor was advised the facility is not subject to any consent decree, legal settlement, or legal judgement requiring that it establish a dedicated facility, unit, or wing for lesbian, gay, bisexual, transgender, or intersex inmates. Housing would be determined on a case-by-case basis based on a collaborative review based on the inmates medical and mental health status and make a decision in an effort to best protect the inmate. In determining programs (when available) and housing, the facility would consider; whether the placement would ensure the inmate’s health and safety, whether the placement would present management or security problems, as well as the inmates’ views</p>

with respect to his or her own safety. Should Charlotte County Jail receive a transgender or intersex inmate they would be treated as any other inmate and would have access to all available programs and privileges. Charlotte County Jail would review transgender and intersex inmates at least every six months for any threats to safety experienced by the inmate. All inmates assigned to Charlotte County Jail are afforded the opportunity to shower separately from other inmates.

During an interview with the PREA Coordinator, it was discovered that Charlotte County Jail has not had a transgender or intersex offender housed at the jail during this audit period. The auditor was advised the agency houses lesbian, gay, bisexual, transgender, or intersex inmates in general population and not in dedicated facilities, units, or wings solely based on their sexual orientation, genital status, or gender identity.

Based on the review of the agency policy, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.

<b>115.43</b>	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires inmates that are at high risk for sexual victimization will not be placed in involuntary segregation unless an assessment of all other alternatives has been made and there is no other alternative. If such assessment cannot be made immediately, the inmate may be held in involuntary segregation for less than 24 hours. If segregation is arranged, it will not ordinarily exceed a period of 30 days; if so, a review will be done to determine the need to continue separation from general population. Any segregation used to protect an inmate that alleged sexual abuse shall be subject to these requirements. Documentation for inmates placed in involuntary segregation will include the jail's concern for the inmate and why no alternative could be arranged. Inmates placed in segregation will have opportunities and privileges that are available in the jail. If any programs or privileges are restricted, documentation will be made of the reasons and duration of the limits.</p> <p>Charlotte County Jail has not placed any inmates at high risk for sexual victimization in involuntary segregated housing in the past 12 months. In an interview with the Captain, he reiterated that no inmates have been placed in segregated housing to separate the victims from likely abusers.</p> <p>Per the Pre-Audit questionnaire completed by the PREA Coordinator there have been no inmates identified as high risk of victimization requiring placement in restricted housing in the past year. During the interview with the Captain it was also confirmed no inmates have been placed in segregated housing to separate the victims from likely abusers in 2019 or 2020.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews, and review of documentation the facility has demonstrated compliance with this standard.</p>

115.51	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Detection and Reporting, Inmates Responsibilities, indicates inmates may report sexual assault/abuse, misconduct or retaliation by other inmates or staff. Reports of staff neglect or violation of responsibilities that may have contributed to such misconduct may be reported by inmates. Inmates can report such conduct in writing, anonymously, verbally to staff, by a third party, and shall be promptly documented or by calling a toll-free number provided for that purpose. Staff will accept reports made to them verbally, in writing or by third parties. Any staff member can privately report sexual abuse or sexual harassment of inmates to any supervisor or the Jail Captain. Inmates may report abuse or harassment to a public or private entity or office by using the mailing address provided that is not part of the jail and that is able to receive and immediately forward such reports to facility officials allowing the inmate to remain anonymous upon request. Inmates that are held solely for immigration purposes will be provided information on how to contact relevant officials and officials of the Department of Homeland Security. Any staff member, volunteer, or contractor will immediately report to his or her supervisor any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred or any retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. All reports received, including anonymous and third-party reports, will be given to the investigator. Staff can privately report any incident to the Jail Captain.</p> <p>Per the Inmate Handbook, Inmates can report to any staff member verbally, in writing or anonymously. Inmates can fill out a medical request, an inmate's request form, a grievance form, or an emergency grievance. Inmates can report to an outside agency, hotline number is not recorded and mail that is marked from the crisis center will be opened in front of inmate. Once reports are made to an outside agency, the reports are required to be forwarded to the jail for investigation. Inmates can have a family member or friend report for them. The inmate handbook also contains specific information on Prison Rape Elimination Act, PREA Hotline and other ways to report to Piedmont Crisis Center, P.O. Box 487, Blackstone, VA 23824.</p> <p>The facility provides multiple ways for inmates to report sexual abuse and sexual harassment, as well as retaliation for reporting sexual abuse and any staff neglect or violation of responsibilities that may have contributed to such incidents. Inmates are informed upon intake they can report to any staff member, including contractors or volunteers, who are mandated to report all allegations of sexual abuse or sexual harassment. Additionally, inmates are advised during the intake process that they can report externally by dialing #8. The #8 line goes directly to Piedmont Crisis Center where the inmate can report sexual abuse/sexual harassment or requesting emotional support following an incident of sexual abuse or sexual harassment. This call does not require an inmate's personal identification number.</p> <p>Charlotte County Jail has a Memorandum of Understanding Piedmont Crisis Center. This MOU confirms that Piedmont Crisis Center will receive calls alleging sexual abuse and sexual harassment and forward this information to the Agency's PREA Coordinator.</p>

Additionally, an agreement was established on July 8, 2013, between the Charlotte County Jail and William Green, Commonwealth Attorney for Charlotte County. It is agreed upon, recognized and/or understood that:

- The Commonwealth Attorney for Charlotte County will provide an address to the Charlotte County Jail made available to inmates for the purpose of receiving reports of alleged sexual abuse and sexual harassment and will accept such reports.
- The Charlotte County Jail will make such address available to inmates.
- The Commonwealth Attorney for Charlotte County will immediately forward reports received of sexual abuse and sexual harassment allegations of inmates to the Charlotte County Jail allowing inmates to remain anonymous upon request.
- The Charlotte County Jail will accept reports that are made by the Commonwealth Attorney for Charlotte County.

This agreement shall be reviewed on an as needed basis by the Jail Captain, the Sheriff of Charlotte County, and the Commonwealth Attorney for Charlotte County. The content of the agreement is subject to revision for just cause or necessity based upon the agreement of all parties concerned. During the report writing phase of the PREA Audit, an updated letter from the Commonwealth Attorney for Charlotte County dated August 24, 2020, was received confirming that the agreement was still in place.

Staff interviews confirmed they accept allegations of sexual abuse or sexual harassment verbally, in writing, anonymously, and from third parties and immediately report the allegation received to their supervisor and/or the PREA Coordinator. Staff also confirmed during their interviews that they were knowledgeable about their ability to report to their supervisor, investigator or PREA Coordinator privately and anonymously.

Inmate interviews indicated they were familiar with how to report sexual abuse or sexual harassment. It was also confirmed through inmate interviews that reporting information was provided during intake, and that this information is posted all housing areas on the bulletin boards/doors.

While touring the entire facility, it was observed in each unit's dayroom, the PREA information (posters) and PREA/Sexual Abuse Hotline number posted near telephones.

Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.

<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Charlotte County Jail does not have an administrative procedure that addresses an inmate's grievance regarding sexual abuse. In accordance with section (a) of this standard, the Charlotte County Jail is exempt from this standard.</p>

115.53	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Mandates that the jail attempt to make available to the victim an advocate from an outside source to accompany and support the victim through the forensic medical examination process, investigatory interviews and for emotional support, crisis intervention information, and referrals through the use of a mailing address and hotline number for outside emotional support services related to sexual abuse. Reasonable communication will be allowed between inmates and an outside advocacy group in as confidential manner as possible.</p> <p>Charlotte County Jail Rules and Regulations Handbook contains specific information on Prison Rape Elimination Act, PREA Hotline, emotional support services and other ways to report to Piedmont Crisis Center, P.O. Box 487, Blackstone, VA 23824. The Jails Rules and Regulations Handbook advises inmates that they can report to an outside agency (Piedmont Crisis Center), via #8. The hotline, #8, is not recorded and mail that is marked from the crisis center will be opened in front of inmate. Once reports are made to an outside agency, the Piedmont Crisis Center is required to forward the report to the jail for investigation. Inmates can have a family member or friend report for them as well.</p> <p>Per staff interviews, inmates can request confidential support services through staff or through the Piedmont Crisis Center, a community service provider in accordance with the MOU would provide such services.</p> <p>During the inmate interviews multiple inmates were unfamiliar with the emotional support services offered by Piedmont Crisis Center but indicated it was something posted in the unit's dayroom. The consultant recommended that additional training or education material be provided to the inmate population since it was not clear that the inmates clearly understood the services offered by Piedmont Crisis Center. During the post audit phase, the PREA Coordinator provided supporting documentation confirming that the current inmate population received additional educational material on services available through Piedmont Crisis Center.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This auditor viewed the website and confirmed the information regarding third-party reporting.</p> <p>Staff and investigator interviews confirmed they can receive allegations of sexual abuse or sexual harassment from third party reporters and such reports would be investigated as if an offender made the allegation. Third party assistance includes fellow inmates, family members, attorneys, and outside advocates. Inmate interviews confirmed their awareness of reporting sexual abuse or sexual harassment to others outside of the facility.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and Inmate interviews, and review of documentation the facility has demonstrated compliance with this standard.</p>

115.61	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Staff Responsibilities, indicates any staff member, volunteer, or contractor will immediately report to his or her supervisor any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred or any retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. All reports received, including anonymous and third-party reports, will be given to the investigator. Apart from reporting to designated supervisors or officials, staff shall not reveal any information related to sexual abuse reports to anyone other than the extent necessary to make treatment, investigation, and other security and management decisions. Any information related to sexual abuse reports will only be given to medical, investigations, mental health other security or management, as necessary. Medical and Mental Health is required to report sexual abuse and is required to inform inmates of staff's duty to report, and the limitations of confidentiality. If the alleged victim is under the age of 18 or is considered a vulnerable adult under state or local vulnerable person statute, the agency will report the allegation to the designated agency.</p> <p>Random staff interviews to include medical staff confirmed the requirement to report any knowledge, suspicion or information of sexual abuse or sexual harassment immediately. Staff confirmed they would notify their supervisor then complete a written report with the details of any incidents that would occur in the facility in compliance with this standard. Staff also confirmed during interviews, they are prohibited from sharing information with anyone who is not part of the investigation or reporting process. An interview with medical staff confirmed medical's responsibility to inform inmates of their duty to report and limitations of confidentiality. Both the Captain and PREA Coordinator indicated that all allegations of sexual abuse or sexual harassment, regardless of how received where the information came from, is reported immediately to the investigator. There have been no allegations of sexual abuse or sexual harassment reported during the audit period. Therefore, the auditor was unable to confirm via investigation reports that upon receipt of an allegation the investigation began immediately. However, during the interview with the investigator he confirmed upon receipt of an allegation of sexual abuse or sexual harassment the investigation would begin immediately.</p> <p>During the interview with the PREA Coordinator it was confirmed that Charlotte County Jail does not confine juveniles and there have been no reported incidents of sexual abuse or sexual harassment involving vulnerable adults.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.62	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires when the jail learns that an inmate is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate.</p> <p>Documentation and interviews with the Sheriff, Captain and other randomly selected staff were able to articulate, the steps they would take, upon becoming aware that an inmate may be subject to a substantial risk of imminent sexual abuse. Random staff interviews confirmed if an inmate were in danger of sexual abuse or at substantial risk of imminent sexual abuse, they would act immediately to ensure the safety of the inmate by separating from the alleged perpetrator and contacting their supervisor immediately. The PREA Coordinator interview and the pre-audit questionnaire confirmed there had been no incidents that involved immediate action to protect an inmate that was a substantial risk of imminent sexual abuse during this audit period.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews, and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.63	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires if it is reported during screening or at any time after intake that a sexual allegation occurred prior to, during arrest, or at another facility, the jail will attempt to notify the other facility as soon as possible of the allegation, but no later than 72 hours after receiving the allegation and the agency shall document that it has provided such notification. The facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards.</p> <p>The PREA Coordinator interview and the pre-audit questionnaire confirmed there have been no reports of sexual abuse or sexual harassment occurring while in another facility. Interviews with the Sheriff and Captain confirm their knowledge of both the policy and the standard regarding their responsibilities to report any allegations received regarding another agency within 72 hours upon receipt of the allegation. Both individuals also confirmed, if Charlotte County Jail were to receive an allegation from another facility alleging sexual abuse or sexual harassment had occurred at Charlotte County Jail it would be immediately be investigated.</p> <p>Based on the information discovered in the agency policy, observations, and information obtained through staff interviews, the auditor has determined the facility meets the requirements of the standard.</p>

115.64	<b>Staff first responder duties</b>
	<p data-bbox="252 168 893 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 246 518 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 1476 952">A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires staff ensure the following steps are taken; Isolate the victim and preserve the crime scene. Segregate and isolate alleged perpetrator(s). Notify supervisor immediately of event. (if non-staff, notify staff immediately.) If the incident warrants a time frame that physical evidence could be collected, request the victim and abuser to not take action that would destroy it (showering, eating, brushing teeth, changing clothes, urinating, defecating, smoking, or drinking). Ensure that the alleged abuser does not take actions to destroy any physical evidence (showering, eating, brushing teeth, changing clothes, urinating, defecating, smoking, or drinking). Secure the crime scene if possible, under safety, security, and control of the facility. Document events by Incident Report. If no medical or mental health is on duty at the time of a report, immediately notify Medical/Mental Health "On Call" Personnel if needed. 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 victim pursuant to § 115.62 and shall immediately notify the appropriate medical and mental health practitioners.</p> <p data-bbox="252 996 1476 1288">A review of supporting documentation confirmed that all staff received information on responding to an allegation of sexual abuse by separating the victim from all others, protecting any physical evidence by requesting that the victim does not destroy evidence (through washing, brushing teeth, changing clothing, urinating, defecating, smoking, drinking or eating), protecting any physical evidence by ensuring the alleged perpetrator does not destroy evidence (through washing, brushing teeth, changing clothing, urinating, defecating, smoking, drinking or eating), and securing the crime scene.</p> <p data-bbox="252 1332 1460 1489">During random staff interviews, staff were able to clearly articulate the steps required if they become aware of a sexual abuse. An interview with a medical staff also confirmed medical's knowledge and steps that would be taken following the receipt of receiving notification of a sexual abuse.</p> <p data-bbox="252 1534 1476 1646">There has been no staff responding as a first responder to an incident of sexual abuse during the past twelve (12) months at Charlotte County Jail. However, this auditor is confident that staff are knowledgeable and would respond appropriately.</p> <p data-bbox="252 1691 1460 1803">Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.65	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires the jail to have a written plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health, investigators, and jail administration.</p> <p>Interviews with the Jail Administrator and staff confirmed their knowledge of their duties to coordinate actions taken in response to an incident of sexual abuse. This auditor reviewed the PREA Coordinated Response Plan. The plan consisted of systematic guidance for First Responder, Supervisor, Evidence Collection, Medical, Mental Health, Investigator, and PREA Coordinator. Charlotte County Jail Coordinates response plan addresses all the components of the PREA standards.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.66	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>In accordance with the Code of Virginia, collective bargaining is prohibited. Per 40.1-57.2, “no state, county, municipal, or like governmental officer, agent or governing body is vested with or possesses any authority to recognize any labor union or other employee association as a bargaining agency of any public officers or employees, or to collectively bargain or enter into any collective bargaining contract with any such union or association or its agents with respect to any matter relating to them or their employment or service.”</p> <p>Based on the information discovered in the Code of Virginia and interview with the PREA Coordinator, the auditor has determined the facility meets the requirements of the standard.</p>

115.67	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1477 741">A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires inmates who report sexual misconduct, or assist in the investigation of an alleged sexual misconduct violation, will be protected against retaliation from other inmates and staff. Inmate victim and abuser may be moved or transferred and alleged staff or inmate abuser will be removed from contact with the victim if the victim fears retaliation. Segregation may be used if there are no other means to ensure the safety of the victim. The jail staff shall monitor the treatment and conduct of inmates and staff involved in allegations for a period of 90 days for possible retaliation and will act promptly to any retaliation. The jail will continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need. If the allegation is unfounded, any monitoring will be terminated.</p> <p data-bbox="252 786 1477 1122">Charlotte County Jail has designated the PREA Coordinator as the individual responsible for monitoring for retaliation. During the interview with the PREA Coordinator she indicated there have been no reports of sexual abuse or sexual harassment resulting in monitoring for retaliation. However, should Charlotte County Jail receive such allegations she would monitor and document at the minimum for at least ninety (90) days, and possibly longer if it were deemed necessary. Monitoring would include periodic status checks, review of disciplinary reports, and housing changes for inmates. For staff, monitoring would include face-to-face checks, checks for negative performance reviews, shift changes, and post reassignments.</p> <p data-bbox="252 1155 1422 1323">An interview with Sheriff and Captain confirmed the PREA Coordinator is responsible for monitoring for retaliation for both inmates and staff who reported the sexual abuse/sexual harassment, inmates and staff who report retaliation for cooperating with an investigation regarding sexual abuse/sexual harassment.</p> <p data-bbox="252 1357 1469 1435">The Pre-Audit Questionnaire indicates there have been no protective measures or monitoring of retaliation during the past twelve (12) months.</p> <p data-bbox="252 1469 1453 1592">Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires any segregation used to protect an inmate that alleged sexual abuse shall be subject to these requirements: Documentation for inmates placed in involuntary segregation will include the jail's concern for the inmate and why no alternative could be arranged. Inmates placed in segregation will have opportunities and privileges that are available in the jail. If any programs or privileges are restricted, documentation will be made of the reasons and duration of the limits.</p> <p>Per the interview with the PREA Coordinator and supporting documentation, there have been no inmates identified as high risk of victimization requiring placement in restricted housing in the past year. The Sheriff indicated during his interview that an inmate may be placed in involuntary restrictive housing (holding cell) overnight to determine an alternative means of separation from potential abusers and/or other housing area. He indicated if inmates were placed in involuntary segregation for their own protection, they would have access to programs, privileges, education, and work if there are no safety concerns. The Sheriff also confirmed during his interview that this information would be documented and reviewed in accordance with policy at least every thirty (30) days by the designated administrators.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.71	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires all investigations into allegations of sexual abuse and sexual harassment will be done promptly, thoroughly, and objectively. No standard higher than the preponderance of the evidence will be imposed in determining whether allegations of sexual abuse or sexual harassment are substantial. An initial investigation can be conducted by the Jail Captain. Unless it is quick and definite to determine that the allegation is unfounded, the investigation should be referred to the Charlotte County Sheriff's Office. All such referrals will be documented. Investigators with special training in sexual abuse investigations will be used when sexual abuse is alleged. Criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. Administrative investigations include an effort to determine whether staff actions or failure to act contributed to the abuse. The investigator shall review the nature of the allegations received to determine if an investigation is warranted. If so, investigators will be responsible for Gathering and preserving direct and circumstantial evidence, available physical and DNA evidence, and available electronic monitoring data. The investigator will ensure that all evidence collected at the jail and from the hospital is handled in accordance with the Charlotte County Sheriff's Office Policy Manual General Orders 2-31 Appendix 2. Interviewing alleged victims, suspected perpetrators, and witnesses. Review prior complaints and reports of sexual abuse involving the suspected perpetrator. No compelled interviews will be conducted by the Jail until consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. Upon notification of an alleged sexual abuse or misconduct, the investigator shall follow the Charlotte County Sheriff's Office Policy Manual General Orders 2-31. The credibility of an alleged victim, suspect, or witness will be assessed on an individual basis and will not be determined by the person's status as an inmate or staff. An inmate who alleges sexual abuse will not be required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of alleged allegation. All administrative and criminal investigations will be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments and investigative facts and findings. Any substantiated allegations of conduct that appear criminal will be referred for prosecution. All written reports of administrative and criminal investigations will be retained by the Jail for as long as the alleged abuser is incarcerated or is employed by the agency, plus five years. An investigation will not be terminated just because the alleged abuser or victim departs from employment or control of the Jail. During the investigation, the agency will cooperate with the investigators and will endeavor to remain informed about the progress of the investigation.</p> <p>Charlotte County Sheriff's Office Policy Manual General Orders 2-31 Appendix 2, (rev 2013): Provides the following general rules: Safeguard crime scene and evidence that is collected. Call a crime scene unit or evidence technician, if available. Use caution not to damage, mark, or contaminate evidence. Initial and date all items seized. Document chain of evidence in report and place all evidence in appropriate containers, seal, and initial. At the Crime Scene: Collect undergarments, clothing, bedding, rugs, or other appropriate items, which may contain</p>

semen, blood or be damaged. Collect washcloths or towels, which may have been used. Collect bottles, glasses, or other objects, which may contain latent prints. Search scene for foreign objects (buttons, hair, pieces of torn clothing). If crime occurred outdoors, take soil samples from several areas, and sketch the location of each sample taken. If crime occurred in a car, gather sweepings from seats and floors, search floor mats for stains along with seat covers. If entry was forced into the victim's house, gather samples of broken glass, paint samples, and note any pry marks. Photograph crime scene. Photograph bite marks, scratch marks, or other signs of brutality or injury to victim. Only female officers or medical personnel should photograph private sexual areas.

Notes to be Prepared: Description of exact location where each piece of evidence was found. Description of victim's appearance and behavior. Note: bruises or marks, facial discoloration, disarrayed clothing, smeared makeup, hair disheveled, confused, or dazed behavior, bewilderment or disorientation, apparent hysteria or crying, incoherent speech. Description of victim's clothing. Note locations of torn garments, dirt, stains--blood, semen, grass. Description of suspect. Physical description as provided by victim with special attention to items, which would not be readily visible if the suspect were clothed: scars, tattoos, moles. Have all signs of trauma or injury, as well as emotional state of the victim, recorded on hospital record. Be certain that smears are taken from vagina, anus, and mouth of victim.

There were no sexual abuse/sexual harassment allegations received within the audit period.

During the investigator interview, he reported that an investigation begins immediately upon notification. Initial response would include reviewing the information reported, interviewing the victim, ensure medical and mental health care is provided, gathering evidence, and notifying the hospital if within the designated timeframe for collecting evidence. He reports that evidence that may be collected include electronic video footage, clothing, medical records, witness statements, victim statement, alleged perpetrator statement, and PERK (physical evidence recovery kit). He reports that the credibility of the victim is based on evidence found, and that a polygraph examination or truth-telling device would never be used as a condition for proceeding with an investigation or to determine credibility. The investigator also confirmed that an investigation would not stop if the alleged inmate perpetrator were released or alleged staff perpetrator resigned prior to completion of the investigation.

Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.

115.72	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires no standard higher than the preponderance of the evidence will be imposed in determining whether allegations of sexual abuse or sexual harassment are substantial.</p> <p>There were no sexual abuse/sexual harassment allegations received within the audit period. However, confirmation was received during the interview with the investigator that the preponderance of evidence is utilized to determine whether the allegations of sexual abuse or sexual harassment are substantiated.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

<b>115.73</b>	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires following an investigation, the jail shall request the relevant information from the investigator in order to inform the inmate as to whether the allegation was determined to be substantiated, unsubstantiated, or unfounded. All such attempts and notifications will be documented. If inmate allegations are against a staff member, the jail will inform the inmate if the allegation is unsubstantiated or unfounded, if the staff member is no longer employed at the jail, if the staff member has been removed from duty, or has been indicted or convicted of the charge. If the inmate is released from the jail's custody, the obligation to report this is terminated. If inmate allegations are against another inmate, the jail will inform the inmate if the allegation is unfounded or unsubstantiated, if the inmate has been indicted or convicted on a sexual abuse charge. If the inmate is released from the jail's custody, the obligation to report this is terminated.</p> <p>Interviews with both the investigator and the PREA Coordinator confirmed all investigation outcomes whether the allegation is determined to be substantiated, unsubstantiated or unfounded following an investigation would be communicated in writing to the alleged victim. The PREA Coordinator also confirmed she is responsible for notification and the documentation would be maintained with the investigation information.</p> <p>There were no sexual abuse/sexual harassment allegations received within the audit period, so written confirmation could not be observed.</p> <p>Based on the review of the agency policy and procedures, information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.76	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Mandates any behavior of a sexual nature between staff and inmates is prohibited. Staff is subject to disciplinary action up to and including termination for violating sexual misconduct under the Charlotte County Sheriff's Office Policy Manual Rules and Regulations 1.7 Category III Offense, as well as criminal prosecution under the Code of Virginia. Termination will be the presumptive disciplinary action for staff who has engaged in sexual abuse. Disciplinary actions for violations of policies relating to sexual abuse or sexual harassment will be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and actions imposed for comparable offenses by other staff with similar histories. All termination or resignations by staff that would have been terminated for violations of sexual abuse or sexual harassment policies will be reported to law enforcement agencies and to any relevant licensing bodies.</p> <p>Interviews with the Sheriff and Human Resource Administrative Staff confirmed there were no instances where a staff member was disciplined for violating the agency sexual abuse or sexual harassment policies in the past twelve.</p> <p>Based on the review of the agency policy and procedures, information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.77	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires any behavior of a sexual nature between volunteers and contractors and inmates is prohibited. If a volunteer or contractor engages in such activity, they will be prohibited from having contact with inmates and will be reported to law enforcement and relevant licensing bodies.</p> <p>An interview with the Captain confirmed that any contractor or volunteer who is alleged to have violated the sexual abuse or sexual harassment policies would not be permitted to enter the facility pending the outcome of the investigation.</p> <p>The PREA Coordinator confirmed there were no instances where a volunteers and contractors were disciplined for violating the agency sexual abuse or sexual harassment policies in the past twelve.</p> <p>Based on the review of the agency policy and procedures, information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

<b>115.78</b>	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires any behavior of a sexual nature by inmates is prohibited and subject to disciplinary action per the Charlotte County Jail Standard Operating Procedures Policy, as well as criminal prosecutions. Consensual sexual activity among inmates will not be permitted. If inmates engage in this type of activity, they will be subject to disciplinary action in accordance with the Charlotte County Jail Standard Operating Procedures Policy. Disciplinary actions will be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the actions imposed of comparable offenses by other inmate's with similar histories. The disciplinary process will consider whether an inmate's disability or mental illness contributed to his or her behavior when determining what type of action, if any, will be taken.</p> <p>Documentation review revealed that there have been no administrative findings of guilt for inmate-on- inmate sexual abuse that have occurred at the facility in the past twelve (12) months that resulted in disciplinary action.</p> <p>An interview with the Captain indicated that inmates may also be referred for prosecution if the allegations were criminal in nature in addition to being subject to disciplinary action.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires if screening indicates that an inmate has experienced prior sexual victimization or has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, then staff will offer a follow-up meeting with medical and/or mental health within 14 days of the intake screening. Information on sexual abuse that occurred in an institutional setting will be strictly limited to medical and mental health and another staff, as necessary. Information about prior sexual victimization that did not occur in an institutional setting warrants consent from inmates from medical and mental health before reporting.</p> <p>Supporting documentation confirms that all inmates are seen by medical upon arrival and offered medical follow-ups regardless if they have experienced prior sexual victimization or have previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community.</p> <p>Medical staff were aware of the requirement for informed consent before reporting information about a sexual victimization that did not occur in an institutional setting unless the victim is under the age of 18. The PREA Coordinator confirmed that persons under the age of 18 have not been housed within Charlotte County Jail. Sections 115.81a-c is none applicable to Charlotte County Jail because this facility is not a prison.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.82	<p><b>Access to emergency medical and mental health services</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires if there is indication of sexual assault, the victim will be transported to the local Emergency Room for further treatment, examination, documentation, collection of forensic evidence, testing for sexually transmitted diseases and access to emergency contraceptives. This treatment will be of no cost to the inmate.</p> <p>An interview with medical staff confirms that victims of sexual abuse receive timely and unimpeded access to emergency medical treatment and crisis intervention services. Medical confirmed that services begin immediately upon notification and the Charlotte County Jail would follow any hospital orders, or medical practitioner follow-up care. If medical staff or mental health staff are not present, the supervisor would make appropriate notifications, following directives of medical staff regarding any forensic examination. Lynchburg General Hospital provides SANE services for Charlotte County Jail, as they have a SANE on staff. Medical staff confirmed the hospital would begin any emergency contraception and sexually transmitted infection prophylaxis treatment/services. Mental health services would begin when the victim is available and after medical care is first provided. The Crossroad Community Service Board would provide services to the victim no later than 48 hours of an incident and provide one-on-one counseling. Piedmont Crisis Center would provide outside emotional support services if requested.</p> <p>In the past 12 months, there had been no allegations where a victim required a forensic medical examination at the facility.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>
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<b>115.83</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, States the jail will offer medical and mental health evaluation and treatment, consistent with the community level of care, as needed to inmates that have been sexually abused, in the form of follow-up services, treatment plans, testing for sexually transmitted infections and, when necessary, referrals for continued care at no financial cost. Female victims that were vaginally penetrated will be offered a pregnancy test. If pregnancy results from sexual abuse, then the victim will receive timely and comprehensive information about and timely access to all lawful pregnancy related medical services. The jail will attempt to conduct a mental health screening on all known inmate on inmate abusers within 60 days of learning that abuse history exists and offer treatment when deemed appropriate by mental health.</p> <p>Interviews with the medical staff confirmed that victims are offered a sexual assault assessment, individual counseling, medication as ordered by the physician, testing for STD and HIV and follow-up. The mental health counseling would also be offered via the Community Services Board. There have been no allegations of alleged offender's sexual abuse that occurred in this facility in the past twelve (12) months. The medical staff have a protocol in place to assist inmates upon discharge from the facility to continue services if needed.</p> <p>Section 115.81h, does not apply to Charlotte County Jail because it is not a prison.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Requires a sexual abuse incident review will be conducted within 30 days after the conclusion of every sexual abuse investigation unless the allegation has been determined to be unfounded. The review will be conducted by supervisors, the Jail Captain, investigator, and mental and medical health. The review team will consider the following information: A need to change policy or practice to better prevent, detect, or respond to sexual abuse; If the incident or allegation was motivated by race, ethnicity, gender identity, lesbian, gay, bisexual, transgender, or intersex identification, status, perceived status, gang affiliation; The area in the jail where the alleged incident occurred to assess whether physical barriers in the area may permit abuse; The adequacy of staffing levels in that area during different shifts; Whether monitoring technology should be deployed or augmented to supplement supervision by staff; The review team will prepare a report of the findings, determinations, and any recommendations for improvement and submit the report to the Captain and the PREA Coordinator; The jail will implement the review team's recommendations for improvements, or will document the reasons for not doing so.</p> <p>During an interview with the Captain and PREA Coordinator, the auditor confirmed that an Incident Review would be conducted upon completion of all sexual abuse investigations that were determined to be substantiated or unsubstantiated. The Incident Review consists of the following: policy or procedure requiring revision, motivation for incident or allegation, assessment of physical barriers in the area; adequacy of staffing levels and assessment of monitoring technology and recommendation for improvements. Charlotte County Jail incident review team consists of upper-level management officials and allows for input from line supervisors, investigators, and medical.</p> <p>There were no allegations of sexual abuse reported as occurring in for Charlotte County Jail in the past twelve (12) months. Staff interviews confirmed their knowledge of the process and would document their review on the Sexual Abuse Incident Review Form that captures all aspects of an incident.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Mandates the jail will collect accurate, uniform data for every allegation of sexual abuse using a standardized instrument and set of definitions. The jail will collect this data annually, and at a minimum, include the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. This information will come from the jail review and collection of all available incident reports, investigation files, and sexual abuse incident reviews. Upon request, the jail will provide all such data from the previous calendar year to the Department of Justice no later than June 30.</p> <p>Charlotte County Jail completed Form SSV3-Survey of Sexual Victimization, 2018, Local Jail Jurisdictions Summary Form.</p> <p>Based on the review of the agency policy and procedures, observations and review of documentation, the facility has demonstrated compliance with this standard.</p>

<b>115.88</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Mandates data will be used to assess and improve the effectiveness of its sexual abuse prevention, detection and responsive policies, practices and training, by identifying problem areas, taking corrective actions and preparing an annual report of its findings and actions made. Such report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse. The agency's report shall be 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. The agency may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility but must indicate the nature of the material redacted.</p> <p>Per the Pre-Audit questionnaire completed by the PREA Coordinator, Charlotte County Jail did not have any incidents that required an investigation, a review, or a report. There were no corrective actions provided by the jail. Charlotte County Sheriff's Office has posted on their website the annual reports for 2018 and 2019, in which the comparison was of the two years of data was reviewed by the auditor. It was recommended by the auditor to the PREA Coordinator that all future reports beginning with the 2020 Annual Report include a comparison of the previous year outline in the annual report, which is the intend of the standard.</p> <p>An interview with the Sheriff confirmed that he approves the annual report and it is made readily available to the public annually through the Charlotte County Sheriff's Office website.</p> <p>Based on the review of the agency policy and procedures, observations and review of documentation, the facility has demonstrated compliance with this standard.</p>

<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>A review of Charlotte County Jail Prison Rape Elimination Act (PREA) Policy-Effective Date: 01-01-2020, Mandates the agency shall 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. The jail will ensure that all sexual abuse data collected pursuant to § 115.87 is securely retained for at least 10 years after the date of the initial collection unless federal, state, or local law requires otherwise.</p> <p>The auditor reviewed the 2018 &amp; 2019 Annual Reports located on County Sheriff's Office website. There is no identifying information located in either reports.</p> <p>An interview with the PREA Coordinator reported that all information is securely maintained in an area where only the PREA Coordinator, Captain and Sheriff has access.</p> <p>Based on the review of the agency policy and procedures, observations and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.401	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This auditor reviewed Charlotte County Sheriff's Office website, <a href="https://www.charlotteva.com/sheriff.htm">https://www.charlotteva.com/sheriff.htm</a> containing the 2017 PREA Audit Report for the one facility operated by Charlotte County Sheriff's Office. This facility was audited in the first year of the second, three-year audit cycle.</p> <p>This auditor had access to the entire facility and was able to conduct staff and inmate interviews in a private room, in addition to being provided with documentation in accordance with the standard. This auditor did not receive any written correspondence but was advised by the PREA Coordinator that inmates were permitted to send confidential information or correspondence to this auditor, in the same method as sending to their legal counsel. The audit notice was posted throughout the facility and written correspondence was sent to the auditor confirming that the PREA audit notices were posted by June 19, 2020.</p> <p>Based on observations and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.403	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This auditor reviewed Charlotte County Sheriff's Office website, <a href="https://www.charlotteva.com/sheriff.htm">https://www.charlotteva.com/sheriff.htm</a> containing the 2017 PREA Audit Report for the one facility operated by Charlotte County Sheriff's Office. Per the PREA Coordinator the 2017 PREA audit report was published within 90 days after the final report was issued by the auditor.</p> <p>Based on observations and review of documentation, the facility has demonstrated compliance with this standard.</p>

<b>Appendix: Provision Findings</b>		
<b>115.11 (a)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
<b>115.11 (b)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
<b>115.11 (c)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	na
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	na
<b>115.12 (a)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na
<b>115.12 (b)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na
<b>115.13 (a)</b>	<b>Supervision and monitoring</b>	
	Does the facility have a documented staffing plan that provides for	yes

	adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes

<b>115.13 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
<b>115.13 (d)</b>	<b>Supervision and monitoring</b>	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes
<b>115.14 (a)</b>	<b>Youthful inmates</b>	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na

<b>115.14 (b)</b>	<b>Youthful inmates</b>	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.14 (c)</b>	<b>Youthful inmates</b>	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.15 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
<b>115.15 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
<b>115.15 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes

<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
<b>115.15 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
<b>115.15 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
<b>115.16 (a)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual	yes

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

<b>115.16 (b)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
<b>115.16 (c)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes

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

<b>115.17 (c)</b>	<b>Hiring and promotion decisions</b>	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
<b>115.17 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
<b>115.17 (e)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
<b>115.17 (f)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
<b>115.17 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes

<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	na
<b>115.21 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

<b>115.21 (b)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
<b>115.21 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
<b>115.21 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes

<b>115.21 (e)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
<b>115.21 (f)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating 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
<b>115.21 (h)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	yes
<b>115.22 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
<b>115.22 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes

<b>115.22 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If a separate entity is responsible for conducting criminal investigations, does 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
<b>115.31 (a)</b>	<b>Employee training</b>	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes

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

<b>115.33 (a)</b>	<b>Inmate education</b>	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
<b>115.33 (b)</b>	<b>Inmate education</b>	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
<b>115.33 (c)</b>	<b>Inmate education</b>	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes
<b>115.33 (d)</b>	<b>Inmate education</b>	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes

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

<b>115.35 (a)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.35 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
<b>115.35 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes

<b>115.35 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
<b>115.41 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
<b>115.41 (b)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
<b>115.41 (c)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

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

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

<b>115.42 (a)</b>	<b>Use of screening information</b>	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
<b>115.42 (b)</b>	<b>Use of screening information</b>	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
<b>115.42 (c)</b>	<b>Use of screening information</b>	
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems?	yes

<b>115.42 (d)</b>	<b>Use of screening information</b>	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes
<b>115.42 (e)</b>	<b>Use of screening information</b>	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
<b>115.42 (f)</b>	<b>Use of screening information</b>	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
<b>115.42 (g)</b>	<b>Use of screening information</b>	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes

<b>115.43 (a)</b>	<b>Protective Custody</b>	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
<b>115.43 (b)</b>	<b>Protective Custody</b>	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes

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

<b>115.51 (b)</b>	<b>Inmate reporting</b>	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
<b>115.51 (c)</b>	<b>Inmate reporting</b>	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.51 (d)</b>	<b>Inmate reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
<b>115.52 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no

<b>115.52 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	na
	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.)	na
<b>115.52 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	na
	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.)	na
<b>115.52 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	na
	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.)	na
	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.)	na

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.)	na
	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.)	na
	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.)	na

<b>115.52 (f)</b>	<b>Exhaustion of administrative remedies</b>	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na
<b>115.52 (g)</b>	<b>Exhaustion of administrative remedies</b>	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	na

<b>115.53 (a)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	na
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
<b>115.53 (b)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
<b>115.53 (c)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
<b>115.54 (a)</b>	<b>Third-party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes

<b>115.61 (a)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
<b>115.61 (b)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
<b>115.61 (c)</b>	<b>Staff and agency reporting duties</b>	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
<b>115.61 (d)</b>	<b>Staff and agency reporting duties</b>	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes

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

<b>115.64 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
<b>115.64 (b)</b>	<b>Staff first responder duties</b>	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
<b>115.65 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
<b>115.66 (a)</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no

<b>115.67 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
<b>115.67 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

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

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

<b>115.71 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
<b>115.71 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
<b>115.71 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
<b>115.71 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
<b>115.71 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
<b>115.71 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
<b>115.71 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	na

<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
<b>115.73 (c)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes

<b>115.73 (d)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (e)</b>	<b>Reporting to inmates</b>	
	Does the agency document all such notifications or attempted notifications?	yes
<b>115.76 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.76 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
<b>115.76 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
<b>115.76 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes

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

<b>115.78 (f)</b>	<b>Disciplinary sanctions for inmates</b>	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na
<b>115.81 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	na
<b>115.81 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes

<b>115.81 (e)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
<b>115.82 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
<b>115.82 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
<b>115.82 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
<b>115.82 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes

<b>115.83 (b)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
<b>115.83 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
<b>115.83 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
<b>115.83 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
<b>115.83 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.83 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes

<b>115.83 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na
<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
<b>115.86 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.86 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes

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

<b>115.87 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.87 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
<b>115.87 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na
<b>115.88 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
<b>115.88 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
<b>115.88 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes

<b>115.88 (d)</b>	<b>Data review for corrective action</b>	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
<b>115.89 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
<b>115.89 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
<b>115.89 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.89 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	During the 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

<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a “no” response does not impact overall compliance with this standard.)	yes
	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.)	no
	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.)	no
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. 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