

PREA Facility Audit Report: Final

Name of Facility: Cumberland County Prison

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 05/02/2023

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input 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 type="checkbox"/>
Auditor Full Name as Signed: Patrick J. Zirpoli	Date of Signature: 05/02/2023

AUDITOR INFORMATION	
Auditor name:	Zirpoli, Patrick
Email:	pzirpoli@ptd.net
Start Date of On-Site Audit:	04/11/2023
End Date of On-Site Audit:	04/13/2023

FACILITY INFORMATION	
Facility name:	Cumberland County Prison
Facility physical address:	1101 Claremont Rd, Carlisle, Pennsylvania - 17015
Facility mailing address:	Carlisle, Pennsylvania

Primary Contact	
Name:	Mike Eickhoff
Email Address:	mweickhoff@cumberlandcountypa.gov
Telephone Number:	7172458752

Warden/Jail Administrator/Sheriff/Director	
Name:	Travis Shenk
Email Address:	tkshenk@cumberlandcountypa.gov
Telephone Number:	1712458750

Facility PREA Compliance Manager	
Name:	
Email Address:	
Telephone Number:	

Facility Health Service Administrator On-site	
Name:	Michelle Young RN
Email Address:	meyoung@cumberlandcountypa.gov
Telephone Number:	7172458730

Facility Characteristics	
Designed facility capacity:	612
Current population of facility:	350
Average daily population for the past 12 months:	283
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males
Age range of population:	18-79
Facility security levels/inmate custody levels:	min. med. max
Does the facility hold youthful inmates?	Yes
Number of staff currently employed at the facility who may have contact with inmates:	142
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	15
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	232

AGENCY INFORMATION	
Name of agency:	Cumberland County Prison Board
Governing authority or parent agency (if applicable):	Prison Board
Physical Address:	1101 Claremont Road, Carlisle, Pennsylvania - 17015
Mailing Address:	Carlisle, Pennsylvania
Telephone number:	7172458752

Agency Chief Executive Officer Information:	
Name:	Michael Eickhoff
Email Address:	mweickhoff@cumberlandcountypa.gov
Telephone Number:	7172458752

Agency-Wide PREA Coordinator Information			
Name:	Mike Eickhoff	Email Address:	meickhoff@ccpa.net

SUMMARY OF AUDIT FINDINGS

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:

5

- 115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
- 115.31 - Employee training
- 115.34 - Specialized training: Investigations
- 115.35 - Specialized training: Medical and mental health care
- 115.71 - Criminal and administrative agency investigations

Number of standards met:

40

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2023-04-11
2. End date of the onsite portion of the audit:	2023-04-13

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	I spoke with YWCA of Carlisle and Pennsylvania Coalition Against Rape, neither knew of any issues at the facility.

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	612
15. Average daily population for the past 12 months:	283
16. Number of inmate/resident/detainee housing units:	19
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit

Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	319
37. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:	1
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	1
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	4
40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	1
41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	1
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	1

<p>43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</p>	<p>5</p>
<p>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>2</p>
<p>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>2</p>
<p>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>No additional comments regarding the population characteristics of inmates in the facility as of the first day of the onsite portion of the audit.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>142</p>

<p>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>232</p>
<p>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>15</p>
<p>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</p>	<p>No additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit.</p>

INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

<p>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>35</p>
<p>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p> <input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None </p>

55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	The inmates were selected by utilizing the above characteristics, this ensured the interviewees were geographically diverse.
56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No additional comments regarding selecting or interviewing random inmates.
Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	18
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
59. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:	1
60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	1

61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	4
62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	1
63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	1
64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	1
65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	5
66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	2

<p>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>After conversations with staff, including medical staff, I determined that no inmates were being housed under this category during the time of the audit.</p>
<p>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>2</p>
<p>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>After conversations with staff I determined that no inmates were being housed under this category during the time of the audit.</p>
<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>No additional comments regarding selecting or interviewing targeted inmates.</p>

Staff, Volunteer, and Contractor Interviews

Random Staff Interviews

<p>71. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>16</p>
<p>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>

<p>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>No additional comments regarding selecting or interviewing random staff.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>17</p>
<p>76. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>78. Were you able to interview the PREA Coordinator?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>79. Were you able to interview the PREA Compliance Manager?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)

- Agency contract administrator
- Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment
- Line staff who supervise youthful inmates (if applicable)
- Education and program staff who work with youthful inmates (if applicable)
- Medical staff
- Mental health staff
- Non-medical staff involved in cross-gender strip or visual searches
- Administrative (human resources) staff
- Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff
- Investigative staff responsible for conducting administrative investigations
- Investigative staff responsible for conducting criminal investigations
- Staff who perform screening for risk of victimization and abusiveness
- Staff who supervise inmates in segregated housing/residents in isolation
- Staff on the sexual abuse incident review team
- Designated staff member charged with monitoring retaliation
- First responders, both security and non-security staff

	<input checked="" type="checkbox"/> Intake staff <input type="checkbox"/> Other
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	6
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input checked="" type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
83. Provide any additional comments regarding selecting or interviewing specialized staff.	No additional comments regarding selecting or interviewing specialized staff.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.

84. Did you have access to all areas of the facility?

Yes

No

Was the site review an active, inquiring process that included the following:

85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?

Yes

No

86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?

Yes

No

87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?

Yes

No

<p>88. Informal conversations with staff during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>All documentation reviewed was identified by the auditor where it was stored.</p>
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Documentation Sampling

Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.

<p>90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>No additional comments regarding selecting additional documentation.</p>
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SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.

92. Total number of SEXUAL ABUSE allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	6	0	5	1
Staff-on-inmate sexual abuse	2	0	2	1
Total	8	0	7	1

93. Total number of SEXUAL HARASSMENT allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	0	0	0	0
Staff-on-inmate sexual harassment	2	0	2	0
Total	2	0	2	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

Note: these counts should reflect where the investigation is currently (i.e., if a criminal investigation was referred for prosecution and resulted in a conviction, that investigation outcome should only appear in the count for “convicted.”) Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual abuse investigation files, as applicable to the facility type being audited.

94. Criminal SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual abuse	0	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0	0
Total	0	0	0	0	0

95. Administrative SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	0	5	0
Staff-on-inmate sexual abuse	0	0	2	0
Total	0	0	7	0

Sexual Harassment Investigation Outcomes

Note: these counts should reflect where the investigation is currently. Do not double count. Additionally, for question brevity, we use the term "inmate" in the following questions. Auditors should provide information on inmate, resident, and detainee sexual harassment investigation files, as applicable to the facility type being audited.

96. Criminal SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual harassment	0	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0	0
Total	0	0	0	0	0

97. Administrative SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	0	2	0
Staff-on-inmate sexual harassment	0	0	2	0
Total	0	0	4	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/sampled:	8
99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	5
101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)

Staff-on-inmate sexual abuse investigation files

103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	2
104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

Sexual Harassment Investigation Files Selected for Review

106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	4
107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)

Inmate-on-inmate sexual harassment investigation files

108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	2
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<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>Staff-on-inmate sexual harassment investigation files</p>	
<p>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>2</p>
<p>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>

<p>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>No additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>
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SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

<p>115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p> <input type="radio"/> Yes <input checked="" type="radio"/> No </p>
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Non-certified Support Staff

<p>116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p> <input type="radio"/> Yes <input checked="" type="radio"/> No </p>
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AUDITING ARRANGEMENTS AND COMPENSATION

<p>121. Who paid you to conduct this audit?</p>	<p> <input checked="" type="radio"/> The audited facility or its parent agency <input type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option) <input type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm) <input type="radio"/> Other </p>
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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.

<p>115.11</p>	<p>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</p> <p>Auditor Overall Determination: Exceeds Standard</p> <p>Auditor Discussion</p> <p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. Organizational chart <p>Interviews</p> <ul style="list-style-type: none"> a. Warden b. PREA Coordinator <p>(a) The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlining the agency’s approach to preventing, detecting, and responding to such conduct. The Policy is the Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act. During the audit process the policy was reviewed, it was confirmed it outlines the agency’s approach to preventing, detecting, and responding to such conduct. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(b) The agency has designated an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards. During staff interviews I confirmed that the PREA Coordinator is available to answer any questions related to PREA. They also confirmed that he makes frequent tours through the facility to ensure that the agency is meeting the PREA Standards daily. I found the PREA Coordinator to be very knowledgeable not only on the PREA Standards but their daily application at the facility. The PREA Coordinator, who is the Deputy Warden of Security, interacts with the Warden on any PREA related issue. This was confirmed during interviews with the PREA Coordinator and Warden. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(c) The agency only operates one facility.</p>
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	<p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has exceeded the requirements of this standard, and all provisions.</p>
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115.12	<p>Contracting with other entities for the confinement of inmates</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. PREA Coordinator <p>(a)(b) During his interview the PREA Coordinator indicated that the agency does not contract for the confinement of inmates with private agencies or other entities, including other government agencies. The agency does have intergovernmental agreements to house inmates for other facilities. All agreements were reviewed, it was confirmed that the audited facility is housing for the tenant counties and no Cumberland County inmates are being housed at these facilities. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>
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115.13	Supervision and monitoring
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. Unannounced rounds documentation Pipe Rounds d. Staffing analysis for 2020 through 2022 <p>Interviews</p> <ul style="list-style-type: none"> a. Warden b. PREA Coordinator c. Intermediate or Higher-Level Facility Staff d. Random Staff e. Random Inmates <p>(a) The agency has developed a staffing plan that provides for 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, the agency has taken into consideration the following:</p> <ul style="list-style-type: none"> (1) Generally accepted detention and correctional practices; (2) Any judicial findings of inadequacy; (3) Any findings of inadequacy from Federal investigative agencies; (4) Any findings of inadequacy from internal or external oversight bodies; (5) All components of the facility’s physical plant (including “blind-spots” or areas where staff or inmates may be isolated); (6) The composition of the inmate population; (7) The number and placement of supervisory staff;

- (8) Institution programs occurring on a particular shift;
- (9) Any applicable State or local laws, regulations, or standards;
- (10) The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and
- (11) Any other relevant factors.

The development of the staffing plan was confirmed with the Warden and PREA Coordinators during interviews.

During the site review the staffing analysis was compared against the following observations:

- The number of staff, contractors, and volunteers present and staffing patterns during every shift, including:
 - In the housing units
 - In isolated areas like administrative/disciplinary segregation and protective custody
 - In the programming, work, education, other areas
 - In areas where sexual abuse is known to be more likely to occur according to the staffing plan.
- Line of sight and blind spots.
- Areas where persons confined in the facility are not allowed to determine whether movement in and out of that space is monitored, to ensure that confined persons never enter those areas.
- Level of supervision and frequency of cell checks in all housing areas.
- Indirect supervision practices, including camera placement and monitoring of the cameras.
- Staffing concerns, including understaffing, overcrowding, poor line of sight, etc.

It was determined that the staffing analysis adequately assessed the staffing and electronic monitoring needs of the facility with sexual safety in mind.

During this site review I found that the number of staff, contractors, and volunteers present and staffing patterns during every shift meet the staffing analysis, this was further confirmed during informal conversations during the tour and formal interviews with both random inmates and random staff.

During the site review no blind spots were identified which did not have either a camera or mirror to view the area. No line-of-sight issues were identified. All non-inmate areas were secured and if an inmate needed to enter an area for cleaning etc. they were accompanied by staff and further monitored on camera. The facility has cameras throughout the facility covering all housing units, and common areas such as the corridors, kitchen, etc. All camera monitors were viewed, there were no remote cross gender viewing issues. The camera cells had the view of the toilet area

obscured. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(b) There have been no deviations from the staffing plan during the auditing period. This was confirmed during the Wardens interview, he further indicated if they had a deviation during any exigent circumstance, it would be documented in an incident report. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(c) During the interviews with the administration at the facility I confirmed a daily review of the staffing at the facility. The facility staffing was reviewed by the administration in 2022, at that time the agency assessed, and documented whether adjustments were needed to:

(1) The staffing plan established pursuant to paragraph (a) of this section;

(2) The facility's deployment of video monitoring systems and other monitoring technologies; and

(3) The resources the facility has available to commit to ensure adherence to the staffing plan.

I reviewed previous staffing plans for the facility, it was confirmed with the administration that the review takes place annually. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(d) The agency has implemented a policy and practice of having supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. The rounds occur on all shifts at the facility and are documented in the Walkthrough Report. During the audit the logs were reviewed, the rounds were further confirmed during staff and inmate interviews. During informal conversations with staff and inmates they relate that they knew of no staffing issues, and staff are making rounds and present on the housing units every day and on every shift. They further indicated that supervisors make regular rounds through the housing areas on every shift. I further confirmed that staffing has no negative impact on safety, accessibility, or limits to out of cell activities such as programming, education, and work. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met

	the requirements of this standard, and all provisions.
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115.14	Youthful inmates
	<p data-bbox="256 188 983 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 557 300">Auditor Discussion</p> <hr/> <p data-bbox="256 340 622 376">Documentation Reviewed</p> <ul style="list-style-type: none"> <li data-bbox="256 416 657 452">a. Pre-Audit Questionnaire <li data-bbox="256 488 1406 600">b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p data-bbox="256 712 405 748">Interviews</p> <ul style="list-style-type: none"> <li data-bbox="256 788 919 824">a. Line Staff Who Supervise Youthful Inmates <li data-bbox="256 860 557 896">b. Youthful Inmates <p data-bbox="256 1003 1481 1576">(a) The facility can house juvenile offenders. At the facility they are housed in a separate housing unit where they have sight and sound separation from adult offenders. The housing unit provides a separate cell, shower, and outside recreation area which is accessed daily. During staff interviews I confirmed the facility can maintain sight and sound separation of the youthful offenders by utilizing this housing unit. They further confirmed that they have never had any issues separating youthful offenders from adults and have never used solitary confinement to achieve this. This was confirmed with the youthful offender who was currently housed at the facility. During the site review the area where a youthful offender would be held was observed. This was a self-contained small housing area with its own outdoor recreation yard and was completely separated from any adult housing unit and provided sight and sound separation. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p data-bbox="256 1617 1469 1774">(b) In areas outside of the housing unit the facility provides direct staff supervision. This was confirmed during the staff and youthful offender interviews. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p data-bbox="256 1814 1437 2056">(c) The youthful inmates are never placed in isolation to comply with the standard. The agency provides the inmates with daily large-muscle exercise and required education. The youthful inmates have access to other activities which occur in the housing area, they do not have any work opportunities. I further confirmed through the staff interviews that the youthful offenders would be offered programming and education services. The youthful offender confirmed that he is completing his High</p>

School education online. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.15	Limits to cross-gender viewing and searches
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. Training Lesson Plan d. Training Transcripts <p>Interviews</p> <ul style="list-style-type: none"> a. Random Staff b. Random Inmates c. Targeted Inmates <p>(a) The facility does not conduct cross-gender strip searches or cross-gender visual body cavity searches. This was confirmed during policy review and during the staff and inmate interviews. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(b) The facility does not conduct cross-gender pat-down searches of inmates. I confirmed during interviews that the facility does not restrict female inmates' access to programming or other out-of-cell opportunities to comply with this provision. I confirmed that females are available on all shifts to conduct pat searches of the female inmates. This was further confirmed during both staff and inmate interviews. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(c) The facility does not conduct cross-gender strip searches and cross-gender visual body cavity searches. This was confirmed during staff and inmate interviews. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(d) The facility has implemented policies that enable inmates to shower, perform</p>

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. This is accomplished by the placement of toilets in the cells and shower curtains for the showers. The toilets that are in the cells are offset from the door. This policy further directs all staff to make opposite gender announcements when entering a housing unit of the opposite gender. These announcements were confirmed during the staff and inmate interviews. I further heard these announcements during the onsite audit. During both the inmate and staff interviews I confirmed that both the staff and inmates feel that they have privacy when showering, performing bodily functions, and changing clothing. During the site review all areas where confined persons may be in a state of undress, such as showering, performing bodily functions, and changing their clothes were viewed. These included all areas inside and outside the housing units. During these observations it was confirmed that nonmedical staff of the opposite gender are not able to view confined persons in a state of undress, including from different angles and via mirror placement, this included electronic surveillance monitoring areas. I found that opposite-gender staff are assigned to monitor video surveillance, but the system does not allow for point, tilt, zoom (PTZ) capabilities which position the camera to where they could see a confined person in a state of undress. During the informal conversations with staff, they knew of no cross-gender viewing issues. This was also confirmed with the inmates during the informal conversations. During the site review while inside housing units, cross-gender announcements were heard. The staff at the facility verbally announce upon entering the housing units. The housing units are small enough that you can hear the announcement in the furthest area from the entryway. The housing unit configuration allows the confined person enough time to cover up before the staff enter the area. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(e) The facility does not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, they have a conversation with them, and if needed medical will talk with them and review any available medical records. This was confirmed during staff interviews and the transgender inmates interviews. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(f) The agency has trained all security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. This was confirmed through reviewing the training that is provided and during the staff interviews. All staff interviewed were able to describe the proper cross gender search techniques. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the

	<p>Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. Language Line Services Instructions <p>Interviews</p> <ul style="list-style-type: none"> a. Random staff b. Inmates who are Limited English Proficient c. Inmates who have identified as disabled <p>(a) The agency has taken all steps to ensure that inmates with disabilities including those who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech 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. The agency provides access to interpreters who can interpret effectively, accurately, and impartially, using any necessary specialized vocabulary. In addition, the agency provides written materials in formats that ensure effective communication with inmates with disabilities, including inmates who have intellectual disabilities, limited reading skills, or who are blind or have low vision. In these cases, staff will read the material to the inmate to ensure they understand the PREA materials. This was confirmed during both the staff and the inmate interviews. The facility will utilize bilingual staff or an interpretation line for non-English speaking inmates. Staff stated that they will utilize these services when needed, they also explained that they will explain the PREA information to inmates who have cognitive disabilities, are of low intelligence, or who have mental health issues. The auditor tested the facility’s process for securing interpretation services on-demand. This process was confirmed by staff who provided the auditor with the instructions for Language Services. The auditor was able to contact Language Services and confirm the on-demand interpretation service. It was confirmed that all staff would have access to these services when needed. After reviewing all documentation, and the information</p>

received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(b) The agency ensures meaningful access to all aspects of the efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient. These steps include providing interpretation services through a telephone language service, and providing materials and signage in Spanish, the predominate second language at the facility. This process was confirmed through staff and inmate interviews. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(c) The agency does not rely on inmate interpreters during PREA incidents, they would utilize the telephone language services; this was confirmed by staff. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.17	Hiring and promotion decisions
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. PREA New Hire Questionnaire <p>Interviews</p> <ul style="list-style-type: none"> a. Administrative (Human Resources) Staff <p>(a) During the staff interview and policy review I verified that the agency does not hire or promote anyone or enlist the services of any contractor who may have contact with inmates, who—</p> <ul style="list-style-type: none"> (1) 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); (2) 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; or (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section. <p>This was confirmed during staff interviews and review of the hiring materials. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(b) During the staff interview and policy review I verified the agency also considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(c) Before hiring new employees, the agency:</p>

(1) Performs a criminal background records check; and

(2) Contacts 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. This was confirmed during staff interviews and review of the hiring materials.

After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(d) The agency performs a criminal background record check before enlisting the services of any contractor who may have contact with inmates. This was confirmed by reviewing the criminal background check log and during interviews. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(e) During the audit I found that the agency conducts a criminal history check every five years on all staff. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(f) The agency asks all applicants and employees who have contact with inmates directly about previous misconduct described in paragraph (a) of this section during the interview process. The process was confirmed during staff interviews and review of completed questionnaires. Through policy the agency imposes a continuing affirmative duty to disclose any such misconduct. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(g) Policy dictates that any material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(h) During the staff interview and policy review I confirmed that unless prohibited by law, the agency will 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. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the

	information received during the facility interviews, I found that the agency meets the requirements of this standard, and all provisions.
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115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. Camera Locations <p>Interviews</p> <ul style="list-style-type: none"> a. Warden <p>(a) The agency has not acquired a new facility nor substantially expanded or modified the existing facilities. During staff interviews I confirmed that sexual safety of the inmates would be taken into consideration if this occurred. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(b) The agency has not performed updates on the video monitoring system; I confirmed through interviews when doing this they would consider how any changes would enhance the safety of the facility, this included sexual safety. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency is has met the requirements of this standard, and all provisions.</p>

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. Memorandum of Understanding -YWCA Carlisle d. Middlesex Twp Police Department Incident Report <p>Interviews</p> <ul style="list-style-type: none"> a. Investigator b. YWCA Carlisle c. Representative d. Medical Staff e. Random Staff <p>(a) (b) All incidents are immediately responded to by the trained facility investigators, they are further trained in evidence identification and collection. The agency investigators conduct administrative investigations and work directly with the Middlesex Twp. Police Department during any criminal investigation. The agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for both administrative proceedings and criminal prosecutions. The protocols are developmentally appropriate for youth, and the investigators and administration understood that they would need to contact ChildLine, and the Cumberland County Children and Youth Services. Any juvenile victim would be taken to a child advocacy center for treatment. These protocols are outlined in the above policy, all staff interviewed understood these protocols. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(c) (d) The facility would transport all victims to Carlisle Hospital and victim advocacy from YWCA Carlisle would respond to the hospital. The facility holds an MOU with YWCA Carlisle, the MOU outlines the responsibility to provide services. The PREA Coordinator and Medical staff confirmed these services are offered at no cost to the</p>

victim. I contacted both Carlisle Hospital and YWCA Carlisle and confirmed that these services are offered and are at no cost. I further confirmed with YWCA Carlisle that they will accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(e) (f) I confirmed that the criminal investigators who conduct sexual abuse investigation would follow the requirements of paragraphs (a) through (e) of this section. These investigators are highly trained criminal investigators from the Middlesex Twp. Police Department. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(h) The agency always makes a victim advocate from a rape crisis center available to victims. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.22	Policies to ensure referrals of allegations for investigations
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. Warden b. PREA Coordinator <p>(a) The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. All incidents are reported to the trained agency investigators who ensures that the investigation is immediately responded to. This procedure was confirmed through interviews. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(b) (c) The agency has a policy 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. These procedures for both criminal and administrative investigations are available on the agency website. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(d)(e) The Middlesex Twp. Police Department have a policy in place that governs the conduct of all sexual abuse and sexual harassment investigations. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>

115.31	Employee training
	<p data-bbox="256 188 1015 221">Auditor Overall Determination: Exceeds Standard</p> <hr/> <p data-bbox="256 264 557 297">Auditor Discussion</p> <hr/> <p data-bbox="256 340 622 374">Documentation Reviewed</p> <ul style="list-style-type: none"> <li data-bbox="256 414 657 448">a. Pre-Audit Questionnaire <li data-bbox="256 488 1477 600">b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <li data-bbox="256 640 571 674">c. Training for PREA <li data-bbox="256 714 716 748">d. Training acknowledgements <p data-bbox="256 857 405 891">Interviews</p> <ul style="list-style-type: none"> <li data-bbox="256 931 571 965">a. PREA Coordinator <li data-bbox="256 1005 512 1039">b. Random Staff <p data-bbox="256 1149 1418 1216">(a)(b)(c)(d) The policy indicates that the agency will train all employees who may have contact with inmates on:</p> <ul style="list-style-type: none"> <li data-bbox="256 1256 1299 1290">(1) Its zero-tolerance policy for sexual abuse and sexual harassment; <li data-bbox="256 1330 1404 1442">(2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; <li data-bbox="256 1482 1331 1516">(3) Inmates' right to be free from sexual abuse and sexual harassment; <li data-bbox="256 1556 1441 1624">(4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; <li data-bbox="256 1664 1366 1697">(5) The dynamics of sexual abuse and sexual harassment in confinement; <li data-bbox="256 1738 1382 1771">(6) The common reactions of sexual abuse and sexual harassment victims; <li data-bbox="256 1812 1434 1845">(7) How to detect and respond to signs of threatened and actual sexual abuse; <li data-bbox="256 1886 1142 1919">(8) How to avoid inappropriate relationships with inmates; <li data-bbox="256 1960 1430 2072">(9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and

(10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

The training is tailored to the gender of the inmates at the facility, the facility houses both male and female inmates, so all staff are trained on both genders. The facility provides PREA training to the staff every other year with a policy review on the off year. The staff acknowledge the training through a signature. All staff interviewed verified they receive training and described the training they received. The signed acknowledgement forms and training utilized were reviewed. The training utilized exceeds the aspects of the standard. The policy review takes place with a written exercise after the review to ensure the staff understand PREA, this review is more of a training than just a policy review. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency exceeds the requirements of this standard, and all provisions.

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. Training acknowledgements d. Training Materials for Contractors and Volunteers <p>Interviews</p> <ul style="list-style-type: none"> a. Contractors b. PREA Coordinator <p>(a) (b) (c) The agency has trained all volunteers and contractors who have contact with inmates on their responsibilities under the agency’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures. The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates. At a minimum all volunteers and contractors who have contact with inmates are notified of the agency’s zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents. The agency maintains signed documentation that volunteers and contractors understand the training they have received.</p> <p>I reviewed the materials given to the contractors and volunteers; this material addresses all training items enumerated under this standard. I also reviewed all training sign off sheets and found them to be complete. During the audit I interviewed several contractors, they related that they had received the information on PREA and understood their obligations to immediately report to staff. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the</p>

	information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.
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115.33

Inmate education

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documentation Reviewed

- a. Pre-Audit Questionnaire
- b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act

Interviews

- a. PREA Coordinator
- b. Intake Staff
- c. Random Staff
- d. Random and Targeted Inmates

Onsite review:

As part of the site review, the auditor observed a mock intake process to ensure the sexual safety information was being provided at the point of intake.

During the demonstration, the auditor:

Confirmed the personnel responsible for conducting the intake or transfer.

Tested how the facility provides the necessary PREA information to all inmates, regardless of ability and language, including whether:

Written information is clear and is provided at an appropriate reading-level and is accessible for all inmates in the facility, including those who are limited English proficient, the facility provides written information in Spanish and English the most commonly languages spoken in the facility, the facility provides on-demand telephonic translation services for all other languages.

The facility will provide written materials to assist inmates through the intake process, they will also read written information out loud to accommodate inmates who identify as blind, have low vision, or have limited reading skills.

Mental health staff or treatment staff are involved in the intake process for inmates

with cognitive or functional disabilities.

During the onsite review the auditor conducted informal and formal conversations with staff and inmates, including inmates who identified as limited English proficient (LEP), non-English speaking, and inmates with limited ability to read, write, speak, or understand English.

During the onsite process the auditor confirmed that the on-demand interpretation services are obtained through the Language Line Services, the auditor conducted a mock call to Language Line Services and confirmed that they provide on-demand interpretation services.

During the onsite review the auditor conducted informal and formal conversations with staff and inmates, including with limited ability to read, write, speak, or understand English regarding accessibility of interpretation services when needed.

During the onsite review the auditor observed a mock comprehensive education process and viewed the PREA education session.

During the site review, the auditor:

Confirmed that the comprehensive education is provided via video, with a follow up in person, question, and answer session.

Confirmed the education included the required information as outlined in the Standards.

Determined how the facility makes the comprehensive education accessible to all inmates including inmates who are Deaf or hard-of-hearing, blind or have low vision, cognitively or functionally disabled, limited English proficient, non-English speaking, and/or have limited reading skills.

(a)(b) During the intake process inmates receive information explaining the agency's zero tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment, this information is outlined in the inmate handbook and in written information received at intake staff and medical. The information also provides the reporting avenues for inmates. This was confirmed during the inmate and staff interviews. The facility utilizes a video and question and answer that is conducted during the inmates time in classification. All interviewed male inmates related that they saw the video, some of the female inmates related that they did not remember seeing a video. I informed the facility of this they reeducated every female inmate that evening. All inmates who remembered the video confirmed they went through this process within the first week. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(c)(d)(e) The facility provides inmate education in formats accessible to all inmates, this includes inmates who are limited English proficient, deaf, visually impaired, or

otherwise disabled, as well as to inmates who have limited reading skills. The facility provides materials to inmates in Spanish, they also have designated staff who can provide interpretation of other languages. The treatment staff confirmed they would provide education to these individuals if needed. The facility has all key information on the zero-tolerance policy and reporting avenues provided through signage placed throughout the facility. I viewed this signage during the facility tour. I further confirmed that the signage has been in place during the inmate and staff interviews. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.34 Specialized training: Investigations

Auditor Overall Determination: Exceeds Standard

Auditor Discussion

Documentation Reviewed

- a. Pre-Audit Questionnaire
- b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act
- c. Training certificates

Interviews

- a. Investigator

(a) (b) (c) The agency trained investigators receive the training provided to all employees pursuant to § 115.31. These investigators have further received training on how to conduct investigations of sexual abuse and sexual harassment in confinement settings.

The specialized training received 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.

The investigators received a training certificate indicating they completed the training. During the interview with the agency investigator, I confirmed the contents of the training. During the review of the investigations, I found that the investigators were following the training while conducting their investigations. I found the investigators to be extremely proficient in conducting the administrative investigations. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency exceeds the requirements of this standard, and all provisions.

115.35	Specialized training: Medical and mental health care
	<p>Auditor Overall Determination: Exceeds Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. PrimeCare Medical Policies d. Medical Training <p>Interviews</p> <ul style="list-style-type: none"> a. Medical Staff <p>(a)(d) The agency does not have any full- and part-time medical and mental health care practitioners. All medical and mental health care is provided through PrimeCare Medical Inc. The agency ensures that these contractors are trained yearly on the following:</p> <ul style="list-style-type: none"> (1) How to detect and assess signs of sexual abuse and sexual harassment; (2) How to preserve physical evidence of sexual abuse; (3) How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and (4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment. <p>The contractors receive the training under § 115.32. The training was confirmed during the medical and mental health interviews.</p> <ul style="list-style-type: none"> (b) The medical staff do not conduct forensic examinations. (c) The agency maintains documentation that medical and mental health contractors have received the training through PrimeCare Medical. <p>The agency is far exceeding the requirements of the standard. All medical and mental health practitioners receive this training on a yearly basis, not just once as required by the standard. After reviewing all documentation, and the information received</p>

during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency exceeds the requirements of this standard, and all provisions.

115.41

Screening for risk of victimization and abusiveness

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documentation Reviewed

- a. Pre-Audit Questionnaire
- b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County
Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act
- c. PrimeCare policies

Interviews

- a. Staff Responsible for Screening
- b. Random Inmates
- c. Correctional Counselors
- d. PREA Coordinator
- c. Medical

Onsite Review:

During the site review, the auditor observed a mock intake process which included a screening for risk of being sexually abused or sexually abusive. During the mock intake process, the auditor confirmed that the screenings are conducted by the medical intake staff, this was later confirmed during their interviews. The screening would take place in an office one on one with the inmate for privacy, and I found that the questions are asked in a manner that fosters comfort and elicits responses.

The method for assessing confined persons for risk of being sexually abused by other persons confined in the facility or sexually abusive toward other persons confined in the facility is conducted utilizing a computer-based system that calculates a score which helps the staff to decide the risk of abusiveness or vulnerability. During the completion of these the staff affirmatively ask inmates about their sexual orientation and gender identity by directly inquiring if they identify as LGBTI (in addition to making a subjective determination about perceived status). The screening staff utilize any other information available to them to make these determinations.

During the audit informal and formal conversations were conducted with both staff

and inmates, they all confirmed this process.

(a) (b) (c) (d) (e) All inmates are assessed within 72 hrs. by medical and intake staff, all inmates also undergo the medical intake screening this occurs upon arrival at the facility. The screenings are used to determine the inmate's risk of being sexually abused by other inmates or sexually abusive toward other inmates. The assessments are conducted using an objective screening instrument and take into consideration the following:

- (1) Whether the inmate has a mental, physical, or developmental disability;
- (2) The age of the inmate;
- (3) The physical build of the inmate;
- (4) Whether the inmate has previously been incarcerated;
- (5) Whether the inmate's criminal history is exclusively nonviolent;
- (6) Whether the inmate has prior convictions for sex offenses against an adult or child;
- (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming.
- (8) Whether the inmate has previously experienced sexual victimization;
- (9) The inmate's own perception of vulnerability; and

The initial screening also considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing inmates for risk of being sexually abusive. The initial screening is being conducted during the initial intake by intake and medical personnel that utilize separate computer-based systems that will assign specific notifications and tasks when someone is identified as being vulnerable or abusive. These notifications will alert mental health staff of any issues. If the inmate screens high for sexual victimization or abusiveness a task is automatically created for the inmate to meet with mental health within 14 days. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(f) The facility is reassessing every inmate within 30 days. This reassessment is being completed by the treatment staff. The treatment staff confirmed that they are documenting this in the offender management system. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(g) I confirmed with staff that 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. This would be conducted by classification staff. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(h) I confirmed with staff that an inmate would not be disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked. This was further confirmed by the staff who conduct the screening. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(i) Both screening tools are only accessible to medical and those staff who make housing and programming decisions. This was verified during the staff interviews. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.42	Use of screening information
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. Random Staff b. Random Inmates c. Targeted Inmates d. Screening Staff e. PREA Coordinator f. Medical Staff <p>(a) (b) I verified with staff that the information received from the screenings is being utilized for housing, work, education, and programming decisions with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. They further confirmed that the determinations are made on an individual basis. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(c) (d) (e) I further confirmed during staff interviews that when deciding whether to assign a transgender or intersex inmate to a housing unit for male or female inmates, and in making other housing and programming assignments, they consider on a case-by-case basis whether a placement would ensure the inmate’s health and safety, and whether the placement would present management or security problems. I further confirmed during staff interviews that when deciding whether to assign a transgender or intersex inmate to a housing unit for male or female inmates, and in making other housing and programming assignments, they consider on a case-by-case basis whether a placement would ensure the inmate’s health and safety, and whether the placement would present management or security problems. I also confirmed during interviews that placement and programming assignments for each transgender or</p>

intersex inmate would be reassessed at least twice each year to review any threats to safety experienced by the inmate. They would give serious consideration to the inmate's own views with respect to his or her own safety. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(f) Transgender and intersex inmates are given the opportunity to shower separately from other inmates. The facility provides single occupancy showers, which provides privacy while showering. The interviewed staff indicated that they can shower when the other inmates are locked in their cells. This was also confirmed by the two inmates who identified as transgender. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(g) The facility does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated housing units. This was confirmed during the inmate interviews and review of the housing unit assignments. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County <ul style="list-style-type: none"> Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. PREA Coordinator <p>(a)(b)(c)(d)(e) The facility has a policy prohibiting the placement of inmates at high risk for sexual victimization in involuntary segregated housing. Staff confirmed that the facility has enough alternate housing options that always them to follow the policy.</p> <p>During the interviews I verified that no inmates identified as vulnerable are being placed in involuntary protective custody. The facility has enough housing units that give them the opportunity to place inmates in other housing units to protect them without having to utilize a segregated housing unit.</p> <p>I verified this procedure during the inmate interviews, several had identified as vulnerable during the initial screening. They related that they were not placed in segregated housing. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>

115.51 Inmate reporting

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documentation Reviewed

- a. Pre-Audit Questionnaire
- b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act
- c. Information provided at intake

Interviews

- a. Random Staff
- b. Random Inmates

Onsite Review:

During the site review, the auditor observed posted signage throughout the facility, the signage included the audit notices, how to report sexual abuse and sexual harassment, and access to outside victim emotional support service. All signage was readable and accessible, consistent, and placed throughout the facility to convey vital sexual safety information specific to the facility.

During the site review, the auditor:

- Determined the signage throughout the facility is easily read and accessed by inmates in the facility, specifically:
 - The signage language is clear and easy to understand.
 - The signage specific to emotional support services, and external reporting, included language that clearly details what services are available and for what purposes.
 - The signage was provided in English and translated into Spanish, the most commonly second language spoken in the facility.
 - The signage text size and physical placement accommodates most readers, including those of average height, low vision/visually impaired, or those physically disabled such as in a wheelchair, etc.
 - The information provided by the signage was not obscured, unreadable by graffiti, or missing due to damage.

- All information on the signage is accurate and consistent throughout the facility.

The signage is accessible to staff and inmates and other persons who may need the information or services provided. The signage indicated how to report sexual abuse and sexual harassment which included external and internal reporting methods. These signs were posted in all areas frequented by inmates, including housing units, programming areas, work areas, education areas, and all common areas. The signage was also located near all inmate phones.

During the facility tour the auditor had informal conversations with staff and inmates in the facility regarding signage they confirmed that the signs have been consistent, are easily read and accessible to inmates with disabilities.

The facility provides multiple internal methods for inmates to privately report sexual abuse or sexual harassment, retaliation by other persons confined in the facility or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. During the site review the auditor tested the methods provided for the purpose of assessing whether inmates have regular and timely access to reporting methods and how the facility receives these reports.

The facility internal reporting avenues consist of submitting a written report into a drop box. The auditor ensured the inmates had access to writing materials and the drop box. I confirmed that all materials were accessible to all inmates and did not have to be requested from staff.

During the onsite review the auditor had informal conversations with staff and inmates regarding internal reporting methods, all were familiar with the method. The auditor also confirmed with the inmates that they are aware that they are allowed to report verbally and that they can report not only to an officer in their housing unit, but to other staff in the facility. I further confirmed with staff that they are aware of the process for receiving and documenting verbal reports.

During the site review, the auditor confirmed that the main external reporting avenue for the inmates was through a telephone number to the Pennsylvania Department of Corrections. A test call was conducted, and it was confirmed that the inmates can make the call anytime they are out of their cell, the test call went through to Pennsylvania Department of Corrections.

(a) (b) The agency provides multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. These ways are posted on the housing units and available in the inmate handbook. These reporting avenues include all internal and third-party reporting, the handout, signage, and handbooks

provide the following information:

Cumberland County Prison has a zero-tolerance policy regarding sexual abuse and sexual harassment. Every inmate will be given education in formats accessible to ALL inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, or who have limited reading skills. If you at any time feel you are being sexually abused or harassed, tell a staff member immediately, call the PREA DOC hotline at *9 and leave a message, submit a request slip, or grievance and place it in the lock box on the unit. If you suspect someone is being sexually assaulted or harassed follow the above and remember you can remain anonymous. Third party reporting can be done by writing a letter to: Middlesex Police Department at: 350 N. Middlesex Road, ste#3 Carlisle Pa. 17013.

All treatment services for sexual abuse will be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Inmates can receive emotional support services from identified staff/volunteers with the Carlisle YWCA. Inmates can contact YWCA emotional support advocates through their counselor, or by communicating directly via the mail or an established free hotline from the inmate telephone system. 24 hr. Sexual Assault/ Rape Crisis Hotline 1-888-727- 2877

The inmates have access to all reporting methods which include having the ability to make phone calls and write letters to outside agencies to report. Mailboxes and telephones are located on the housing units. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(c) All staff interviewed understood that they shall accept reports made verbally, in writing, anonymously, and from third parties and promptly document all reports. This was further confirmed when reviewing investigations, which documented the reporting of the incident. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(d) The agency allows all staff to privately report sexual abuse and sexual harassment of inmates outside of their chain of command and directly to the Administration or PREA Coordinator.

The above reporting avenues were confirmed during the staff and inmate interviews. The inmates understood the ways to report, and the staff understood their responsibility if an incident was reported to them. I further confirmed the reporting avenues during the investigation review. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information

	<p>received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>
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115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>The audited facility does not have a grievance policy that addresses sexual abuse. Sexual abuse in the Commonwealth of Pennsylvania would be considered a criminal act. If a grievance were filed, it would be immediately taken out of the grievance process and assigned to an investigator and reported to the Middlesex Twp. Police Department for a criminal investigation. This process was confirmed by the PREA Coordinator.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>

115.53

Inmate access to outside confidential support services

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documentation Reviewed

- a. Pre-Audit Questionnaire
- b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act
- c. MOU with YWCA Carlisle

Interviews

- a. Random Inmates
- b. YWCA Carlisle County Staff

Onsite Review:

During the site review, the auditor observed posted signage throughout the facility, the signage included the audit notices, how to report sexual abuse and sexual harassment, and access to outside victim emotional support service. All signage was readable and accessible, consistent, and placed throughout the facility to convey vital sexual safety information specific to the facility.

During the site review, the auditor:

- Determined the signage throughout the facility is easily read and accessed by inmates in the facility, specifically:
 - The signage language is clear and easy to understand.
 - The signage specific to emotional support services, and external reporting, included language that clearly details what services are available and for what purposes.
 - The signage was provided in English and translated into Spanish, the most commonly second language spoken in the facility.
 - The signage text size and physical placement accommodates most readers, including those of average height, low vision/visually impaired, or those physically disabled such as in a wheelchair, etc.
 - The information provided by the signage was not obscured, unreadable by graffiti, or missing due to damage.

- All information on the signage is accurate and consistent throughout the facility.

The signage is accessible to staff and inmates and other persons who may need the information or services provided. The signage indicated how to report sexual abuse and sexual harassment which included external and internal reporting methods. These signs were posted in all areas frequented by inmates, including housing units, programming areas, work areas, education areas, and all common areas. The signage was also located near all inmate phones.

During the facility tour the auditor had informal conversations with staff and inmates in the facility regarding signage they confirmed that the signs have been consistent, are easily read and accessible to inmates with disabilities.

(a) (b) (c) The facility has entered a MOU with YWCA Carlisle for emotional support services related to sexual abuse. The facility provides the inmates with a phone number and address. The facility enables reasonable communication between the inmates and YWCA Carlisle in as confidential a manner as possible. The inmates are provided telephone numbers to contact YWCA Carlisle. Signage is located on the housing units, in the inmate handbook and on the tablet with information on how to contact YWCA Carlisle. During the inmate interviews I confirmed they know how to contact YWCA Carlisle, they further confirmed the information has been posted on the housing units, and available through the tablet and handbook. The facility does not house inmates detained solely for civil immigration purposes.

I further confirmed during staff interviews that the staff would inform the inmates 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. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.54	Third-party reporting
	<p data-bbox="256 188 983 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 557 300">Auditor Discussion</p> <p data-bbox="256 340 624 376">Documentation Reviewed</p> <ol data-bbox="256 416 1409 743" style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. Signage within facility d. Agency Website <p data-bbox="256 855 467 891">Onsite Review:</p> <p data-bbox="256 927 1477 1128">During the site review, the auditor observed posted signage throughout the facility, the signage included the audit notices, how to report sexual abuse and sexual harassment, and access to outside victim emotional support service. All signage was readable and accessible, consistent, and placed throughout the facility to convey vital sexual safety information specific to the facility.</p> <p data-bbox="256 1164 754 1200">During the site review, the auditor:</p> <ul data-bbox="256 1236 1477 2038" style="list-style-type: none"> • Determined the signage throughout the facility is easily read and accessed by inmates in the facility, specifically: <ul style="list-style-type: none"> · The signage language is clear and easy to understand. · The signage specific to emotional support services, and external reporting, included language that clearly details what services are available and for what purposes. · The signage was provided in English and translated into Spanish, the most commonly second language spoken in the facility. · The signage text size and physical placement accommodates most readers, including those of average height, low vision/visually impaired, or those physically disabled such as in a wheelchair, etc. · The information provided by the signage was not obscured, unreadable by graffiti, or missing due to damage. · All information on the signage is accurate and consistent throughout the facility.

The signage is accessible to staff and inmates and other people who may need the information or services provided. The signage indicated how to report sexual abuse and sexual harassment which included external and internal reporting methods. These signs were posted in all areas frequented by inmates, including housing units, programming areas, work areas, education areas, and all common areas. The signage was also located near all inmate phones.

During the facility tour the auditor had informal conversations with staff and inmates in the facility regarding signage. They confirmed that the signs have been consistent, are easily read and accessible to inmates with disabilities.

During the facility tour the auditor confirmed the third-party reporting signage was posted in public areas of the facility that can be accessed by family members, friends, advocates, and attorneys. These included visitation areas, the main entrance to the facility and public-facing websites.

The auditor tested these reporting avenues by calling the

Pennsylvanian Department of Corrections at 1-844-429-5412

Calling Middlesex Township Police Department at 717-249-7191

All calls were completed with no issues, and I confirmed that they would accept my third-party report and forward it to the facility for investigation. I confirmed with the PREA Coordinator that he would receive reports from these avenues.

(a) The facility has established third-party reporting methods in policy; these methods allow inmates to report for other inmates and outside individuals to report. The facility website outlines the third-party reporting avenues; this was confirmed through a review of the facility website. The following is posted on the website:

Third party reports can be made by calling 1-844-429-5412 and leaving a message on the Pennsylvanian Department of Corrections PREA Hotline. If you feel a criminal act has been or is being committed, please contact Middlesex Township Police Department at 717-249-7191.

The facility has third-party reporting avenues posted in the lobby area of the facility for visitors. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.61	Staff and agency reporting duties
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. Warden b. Medical and Mental Health Staff c. Random Staff <p>(a) The agency requires all staff to report immediately and according to policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, 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 staff interviewed understood the above policy requiring them to report immediately. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(b) The interviewed staff understood that they should not reveal any information related to a sexual abuse report to anyone other than to the extent necessary and as per policy. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(c) During medical and mental health staff interviews I confirmed that they would report sexual abuse pursuant to paragraph (a) of this section and to inform inmates of their duty to report, and the limitations of confidentiality, at the initiation of services. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(d) If the alleged victim is under the age of 18 the agency would report to CHILDLINE at 1-800-932-0313 or the Department of Human Services for any vulnerable adult. This was confirmed with the PREA Coordinator and medical staff. After reviewing all documentation, and the information received during the facility interviews, I found</p>

that the agency is compliant with these provisions of the standard.

(e) All allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, are reported to the facility's designated investigators. This was confirmed during interviews. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. Investigations <p>Interviews</p> <ul style="list-style-type: none"> a. Warden b. Random staff <p>(a) The agencies policies dictate that when staff learns that an inmate is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate. The staff interviewed understood their responsibility and all responded that they would immediately take appropriate steps to protect the inmate. The actions of the staff were further confirmed during the investigative reports review, all first responding staff responded and followed the policy. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. Warden b. PREA Coordinator <p>(a) (b) (c) (d) During interviews and policy review I confirmed that upon receiving an allegation that an inmate was sexually abused while confined at another facility the Warden or Designee would notify the Warden of the other facility. This notification would take place within 72 hours and documented. The Warden confirmed that if they received an allegation under these circumstances, it would be immediately reported to the facility PREA Investigators. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>

115.64	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documentation Reviewed</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. Random Staff <p>(a) (b) During interviews and policy review I confirmed that upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report would:</p> <ul style="list-style-type: none"> (1) Separate the alleged victim and abuser; (2) Preserve and protect any crime scene; (3) 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; and (4) 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. <p>After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(b) During non-security staff interviews I confirmed that they would request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff immediately.</p> <p>During the staff interviews I found that the staff understand their duties as to responding to an incident. They all advised me that they would act immediately and make the protection of the inmate their priority.</p> <p>I confirmed the staff response to these incidents during the investigation review. The first responding staff followed the policy and responded properly to all reviewed</p>

investigations. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. Warden b. Random Staff c. PREA Coordinator <p>(a) The facility has adopted the Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act as the overall institutional plan to respond to sexual abuse incidents. This plan dictates the actions and coordination between first responders, supervisors, administration, medical, mental health, and investigators. I confirmed the institutional plan through review of the plan, as well as during staff interviews and investigation review. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. Warden b. PREA Coordinator <p>(a)(b) Neither the agency nor any other governmental entity responsible for collective bargaining on the agency's behalf has entered or renewed any collective bargaining agreement or other agreement that limits the facilities 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. This was verified through interviews with the administration and review of investigations where staff were removed from a specific post during an investigation. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>

115.67 Agency protection against retaliation

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documentation Reviewed:

- a. Pre-Audit Questionnaire
- b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act

Interviews

Staff assigned to monitor for retaliation

(a)(b)(c)(d) The agency has 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. The PREA Coordinator is designated as the staff member to oversee these efforts. During interviews I was informed that they utilize 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. By policy the monitoring would last a minimum of 90 days following a report of sexual abuse. The monitoring would include behavior changes, disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Policy allows the monitoring to continue beyond 90 days if the initial monitoring indicates a continuing need. The staff confirmed that the monitoring includes periodic status checks of the inmates, all monitoring is documented in the investigative file. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(e) I further confirmed if any other individual who cooperates with an investigation expresses a fear of retaliation, the agency would take appropriate measures to protect that individual against retaliation. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(f) The staff understood that the obligation to monitor would terminate if the allegation is unfounded.

The agency has established through past incidents that they utilize housing transfers, as well as facility transfers of perpetrators to protect the victim in an incident. This

was confirmed during a review of investigations and through staff interviews. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. Warden b. PREA Coordinator c. Random Staff <p>(a) During the interview with staff I found that they understand the restrictions of utilizing protective custody post-allegation. They related that the facility could move inmates to a separate housing unit without having to utilize segregation.</p> <p>It should be noted that if a victim was moved to a protective custody housing unit, no privileges would be lost. They would still have access to all programming, education, recreation, and so forth.</p> <p>During the staff interviews I confirmed that the policy is followed in these situations. At the time of the audit no inmates were being held under these conditions. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>

115.71	Criminal and administrative agency investigations
	<p>Auditor Overall Determination: Exceeds Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. Warden b. Investigator c. PREA Coordinator <p>(a)(b)(c) The agency conducts administrative investigations into allegations of sexual abuse and sexual harassment. During the investigation review I found they are conducting them promptly, thoroughly, and objectively. The investigators have received special training in sexual abuse investigations pursuant to § 115.34. These investigators would gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(d) If the quality of evidence appears to support criminal prosecution, compelled interviews would be conducted by the Middlesex Twp. Police Department. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(e) During interviews I confirmed that the credibility of an alleged victim, suspect, or witness is assessed on an individual basis and not determined by the person's status as inmate or staff. The agency does not require an inmate who alleges sexual abuse to submit to a polygraph examination as a condition for proceeding with the investigation of such an allegation. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(f) The administrative investigations are conducted utilizing the following</p>

guidelines:

(1) includes an effort to determine whether staff actions or failures to act contributed to the abuse; and

(2) documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(g)(h) Criminal investigations are 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. I further confirmed that substantiated allegations of conduct that appears to be criminal are referred for prosecution. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(i) The agency retains all written reports referenced in paragraphs (f) and (g) of this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(j) I confirmed that the departure of the alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(l) When the Middlesex Twp. Police Department investigates sexual abuse, the facility cooperates with them and remains informed about the progress of the investigation through email.

I found the PREA investigators to be well versed in their duties as to the administrative investigation, and more importantly the understanding of when the investigation takes on a possible criminal element, they immediately contact the Middlesex Twp. Police Department.

I reviewed the investigations and found that they were conducted immediately and by the proper authorities. The Administrative Investigators have received training on how to conduct the investigations at the facility level. They work closely with the Middlesex Twp. Police Department during any criminal investigations. The Middlesex Twp. Police Department are highly trained sworn law enforcement officers who will conduct in-depth criminal investigations. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

	<p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency exceeds the requirements of this standard, and all provisions.</p>
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115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. Investigator <p>(a) The agency policy states there shall not be any standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. During the investigator interview, I verified that they are applying the preponderance of evidence when making a determination. I further confirmed this during the investigation review. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>

115.73

Reporting to inmates

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documentation Reviewed

- a. Pre-Audit Questionnaire
- b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act
- c. Completed Investigations
- d. Notification example

Interviews

- a. PREA Coordinator

(a)(b) Following an investigation of sexual abuse conducted by the agency investigators or the Middlesex Twp. Police Department the inmate is informed whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. As per policy this is accomplished verbally and documented in the investigation. This was confirmed through staff interviews and investigation review. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(c) Following an investigation of sexual abuse committed by a staff member the agency informs the inmate whenever:

- (1) The staff member is no longer posted within the inmate's unit;
- (2) The staff member is no longer employed at the facility;
- (3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
- (4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.

As per policy this is accomplished in writing using an inmate request slip with a copy placed in the investigation file. This was confirmed through staff interviews and investigation review. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(d) Following an investigation of sexual abuse committed by another inmate the agency informs the alleged victim whenever:

- (1) The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
- (2) The agency learns that the alleged abuser has been convicted on a charge related

to sexual abuse within the facility.

As per policy this is accomplished in writing using an inmate request slip with a copy placed in the investigation file. This was confirmed through staff interviews and investigation review. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(e) As per policy this is accomplished in writing using an inmate request slip with a copy placed in the investigation file. This was confirmed through staff interviews and investigation review. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.76 Disciplinary sanctions for staff

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documentation Reviewed:

- a. Pre-Audit Questionnaire
- b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act
- c. Completed Investigations
- d. Employee Handbook

Interviews

- a. Warden

(a)(b)(c) The agency policies state that staff are subject to disciplinary sanctions up to and including termination for violating agency policy relating to sexual abuse or sexual harassment. The policy states that termination will be the presumptive disciplinary sanction for staff who have engaged in sexual abuse. The policy further states that all discipline will be 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. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(d) I confirmed through interviews and policy review that all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, will be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

The audited facility has not disciplined any staff within the last 12 months for a violation of these policies.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This

	<p>assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>
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115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. Completed Investigations <p>Interviews</p> <ul style="list-style-type: none"> a. PREA Coordinator <p>(a)(b) The agency policies state that any contractor or volunteer who engages in sexual abuse will be prohibited from contact with inmates and shall be reported to the Middlesex Twp. Police Department for a criminal investigation. The agency would also report to any relevant licensing bodies. I confirmed through interviews and policy review that any violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer would result in the security clearance being revoked. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>I confirmed the utilization of the discipline through staff interviews.</p> <p>The audited facility has not disciplined any volunteers nor contractors within the last 12 months for a violation of these policies.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. Completed Investigations <p>Interviews</p> <ul style="list-style-type: none"> a. PREA Coordinator b. Medical Staff <p>(a)(b)(c)(d) The agency policies state that Inmates are subject to disciplinary procedures. All inmates are issued a copy of the handbook which outlines the inmate disciplinary procedure. This discipline will occur following a substantiated finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse. These sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate’s disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. I confirmed with staff that the process considers whether an inmate’s mental disabilities or mental illness contributed to their behavior when determining what type of discipline. If available, the inmate would be offered therapy through the mental health providers. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(e) I confirmed through policy review and interviews that if an inmate had sexual contact with a staff member who did not consent to the contact the inmate would be charged under the PA Crimes Code and disciplined within the facility. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(f) I confirmed through policy review and interviews that no disciplinary action would take place for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred and that this does not constitute falsely reporting an incident or lying. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these</p>

provisions of the standard.

(g) The agency prohibits all sexual activity between inmates and discipline the inmates for engaging in consensual sexual activity, the agency does not consider this activity sexual abuse.

I confirmed the utilization of the discipline through staff interviews. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

The audited facility has not disciplined any inmates within the last 12 months for a violation of these policies.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.81	Medical and mental health screenings; history of sexual abuse
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. Medical Staff b. Inmates Who Reported Prior Victimization <p>Onsite Review:</p> <p>During the site review, the auditor observed the physical storage area of all information/documentation collected and maintained in hard copy pursuant to the PREA Standards these included risk screening information, medical records, and sexual abuse allegations. It was determined that they were kept secure and not accessible to general staff. All paper copies were secured in locked filing cabinets within locked offices. All digital information was secured in limited access areas of the programs, or password protected.</p> <p>This was confirmed during informal conversations with staff regarding access to secure information.</p> <p>(a)(b)(c)(d)(e) The facility screens inmates during the initial intake, this screening is conducted by the medical department. The screening asks questions relative to prior sexual victimization, whether it occurred in an institutional setting or in the community. The medical staff stated that the mental health provider would be tasked to follow up with the inmate within 14 days. They informed me that the initial follow up occurs much faster than 14 days, this is completed as soon as possible.</p> <p>The medical, and administration confirmed that any information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners and other treatment staff and is used to make treatment plans and security management decisions, including housing, bed, work, education, and program assignments.</p>

The medical practitioners confirmed they would 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. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. Medical Staff <p>(a) During the staff interviews I confirmed that victims of sexual abuse would receive timely, unimpeded access to emergency medical treatment and crisis intervention services. These services would be determined by the medical practitioners according to their professional judgment. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(b) If medical personnel are not available security staff first responders would take preliminary steps to protect the victim pursuant to § 115.62. This was confirmed through interviews with the security staff. They further confirmed that medical staff would be notified immediately. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(c) It was confirmed through interviews that victims of sexual abuse would be offered timely information and access to emergency contraception and sexually transmitted infections prophylaxis. This would be determined by the SANE from Carlisle Hospital. The facility medical provider would then order any contraception and prophylaxis through their provider. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(d) All treatment services are offered free of charge to the victim, this was confirmed through interviews.</p> <p>After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the</p>

	<p>Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act <p>Interviews</p> <ul style="list-style-type: none"> a. Medical Staff <p>(a)(b)(c)(d)(e)(f)(g) During interviews and policy review I confirmed that the facility offers medical and mental health evaluation and treatment to all inmates who have been victimized by sexual abuse. The evaluation and treatment include follow-up services, treatment plans and, referrals for continued care following their transfer or release from custody. These services are consistent with community level of care. Female victims of sexually abusive vaginal penetration while incarcerated would be offered a pregnancy test. If pregnancy results from the conduct described in paragraph § 115.83(d), the victim will receive timely and comprehensive information about all lawful pregnancy-related medical services. All victims of sexual abuse are offered tests for sexually transmitted infections. All treatment services are 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. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>

115.86	Sexual abuse incident reviews
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. Completed Investigations d. Incident reviews <p>Interviews</p> <ul style="list-style-type: none"> a. Warden b. PREA Coordinator <p>(a)(b)(c)(d) The facility policy states that all instances of sexual abuse will be reviewed by a review team which includes upper management, lieutenants, investigator, and Medical or Mental Health Staff.</p> <p>Areas of consideration by the review committee will include:</p> <ol style="list-style-type: none"> 1) Whether the allegations or investigation indicates a need to change policy of practice to better prevent, detect, or respond to sexual abuse. 2) Whether the incident or allegation was motivated by race; ethnicity; gender identity ; lesbian; gay; bisexual; transgender; or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility. 3) Examining the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse. 4) Assess the adequacy of employee staffing levels in the area during different shifts. 5) Assess whether monitoring technology should be deployed or augmented to supplement supervision by employees; and <p>The review team will prepare a report of its findings, the facility shall implement the</p>

recommendations for improvement, or shall document its reasons for not doing so. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(e) The purpose of the incident review is to look retrospectively at the incident to ensure that the facility response was PREA compliant. Recommendations for improvement made by the review team will either be implemented or the reasons for not doing so will be documented. During the onsite audit I confirmed the review of incidents through interviews and review of the completed documentation. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.87	Data collection
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. Completed Investigations d. Collected Data <p>Interviews</p> <ul style="list-style-type: none"> a. Warden b. PREA Coordinator <p>(a)(b)(c)(d)(e) The agency collects accurate, uniform data for every reported allegation of sexual abuse using a standardized instrument and set of definitions. The agency aggregates incident-based sexual abuse data at least annually. The standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey on Sexual Violence (SSV) conducted by the Department of Justice. The agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. All documentation is kept in the PREA files. The agency does not contract for the housing of its inmates. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>(f) The Department of Justice has not requested any data from the agency.</p> <p>During interviews and review of the collected data it was confirmed that the policy is being followed.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met</p>

	the requirements of this standard, and all provisions.
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115.88 Data review for corrective action

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documentation Reviewed:

- a. Pre-Audit Questionnaire
- b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act
- c. Completed Investigations
- d. Collected Data

Interviews

- a. Warden
- b. PREA Coordinator

(a) The PREA Coordinator reviews all data collected yearly. This review assesses and improves the effectiveness of the agency sexual abuse prevention, detection, and response policies, practices, and training, including by:

- (1) Identifying problem areas;
- (2) Taking corrective action on an ongoing basis; and
- (3) Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.

After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(b) The report includes a comparison of the current year's data and corrective actions with those from prior years and provides an assessment of the agency's progress in addressing sexual abuse. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

(c)(d) The report is prepared by the PREA Coordinator and approved by the Warden. The reports are available to the public through the agency website. The agency will redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the agency and would indicate the

material redacted. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.

Any data being collected is reviewed by the administration at the facility. I was informed by staff that if a trend was noticed, they would put into place an immediate corrective action plan.

While reviewing the investigations I did not identify any trends or issues that would call for immediate action.

Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.

115.89	Data storage, publication, and destruction
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> a. Pre-Audit Questionnaire b. Cumberland County Prison Policy & Procedures Manual Chapter: Cumberland County Universal Directive/Policy & Procedures Subject: Prison Rape Elimination Act c. Completed Investigations d. Collected Data <p>Interviews</p> <ul style="list-style-type: none"> a. Warden b. PREA Coordinator <p>(a)(b)(c)(d) The agency ensures that the collected sexual abuse/harassment data is properly stored, securely retained, and protected. The agency makes all aggregated sexual abuse data, readily available to the public annually through its website. Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers from the data. The agency maintains sexual abuse data for at least 10 years after the date of its initial collection unless Federal, State, or local law requires otherwise. After reviewing all documentation, and the information received during the facility interviews, I found that the agency is compliant with these provisions of the standard.</p> <p>During interviews and review of the collected data it was confirmed that the policy is being followed.</p> <p>The annual reports were reviewed, all personal data has been reviewed and the annual reports have been made available through the agency's website.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility was audited during the auditing cycle from August 2019 to August 2022.</p> <p>During the audit process, I was able to receive copies of all relevant documentation, conduct private interviews with staff and inmates, tour the complete facility, and receive confidential correspondence from both inmates and staff.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility has published the final audit report on their website, this was confirmed by navigating to the page on the website.</p> <p>Upon completion of the Pre-Audit and Onsite Audit phases, I conducted a systematic evidence review of the information obtained during the audit process. I utilized the Compliance Tool as a guide to ensure that all aspects of the standard were met. This assurance was made by a triangulation of the policies and documentation reviewed, my personal observations during the onsite audit, and through the information received during the interviews. After this review of all documentation, and the information received during the facility interviews, I found that the agency has met the requirements of this standard, and all provisions.</p>

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

115.12 (b)	Contracting with other entities for the confinement of inmates	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na

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

	for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

115.14 (a)	Youthful inmates	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
115.14 (b)	Youthful inmates	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	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).)	yes
115.14 (c)	Youthful inmates	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	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).)	yes
	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).)	yes
115.15 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes

115.15 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes

115.15 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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

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

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

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

115.17 (h)	Hiring and promotion decisions	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	no
115.18 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	no
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

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

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

115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes

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

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

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

115.34 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	yes

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

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

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

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

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

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

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

115.51 (b)	Inmate reporting	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes

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

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

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

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

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

115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.64 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes

115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

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

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

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

115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes

115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes

115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.76 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes

115.78 (a)	Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	Disciplinary sanctions for inmates	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	Disciplinary sanctions for inmates	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	Disciplinary sanctions for inmates	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.78 (f)	Disciplinary sanctions for inmates	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
115.78 (g)	Disciplinary sanctions for inmates	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes

115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	na
115.81 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes

115.82 (a)	Access to emergency medical and mental health services	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes

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

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

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

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

115.88 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes

115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a “no” response does not impact overall compliance with this standard.)	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.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes

115.403 (f)	Audit contents and findings	
	<p>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.)</p>	yes