

# PREA Facility Audit Report: Final

**Name of Facility:** Dixon Correctional Institute

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** 11/08/2021

**Date Final Report Submitted:** 11/23/2021

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> William Peck	<b>Date of Signature:</b> 11/23/2021

AUDITOR INFORMATION	
<b>Auditor name:</b>	Peck, William
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<b>Start Date of On-Site Audit:</b>	10/06/2021
<b>End Date of On-Site Audit:</b>	10/08/2021

FACILITY INFORMATION	
<b>Facility name:</b>	Dixon Correctional Institute
<b>Facility physical address:</b>	P.O. Box 788, Jackson, Louisiana - 70748
<b>Facility Phone</b>	
<b>Facility mailing address:</b>	

Primary Contact	
<b>Name:</b>	Keith Turner
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Warden/Jail Administrator/Sheriff/Director	
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Facility PREA Compliance Manager	
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Facility Health Service Administrator On-site	
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<b>Telephone Number:</b>	2256341200		
<b>Facility Characteristics</b>			
<b>Designed facility capacity:</b>	1800		
<b>Current population of facility:</b>	16921		
<b>Average daily population for the past 12 months:</b>	1680		
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No		
<b>Which population(s) does the facility hold?</b>	Males		
<b>Age range of population:</b>	17-80		
<b>Facility security levels/inmate custody levels:</b>	Minimum/Medium/Maximum		
<b>Does the facility hold youthful inmates?</b>	Yes		
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	475		
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	6		
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	11		
<b>AGENCY INFORMATION</b>			
<b>Name of agency:</b>	Louisiana Department of Public Safety and Corrections		
<b>Governing authority or parent agency (if applicable):</b>			
<b>Physical Address:</b>	504 Mayflower Street, Baton Rouge, Louisiana - 70802		
<b>Mailing Address:</b>			
<b>Telephone number:</b>			
<b>Agency Chief Executive Officer Information:</b>			
<b>Name:</b>	Chief Seth Smith		
<b>Email Address:</b>	504 Mayflower Baton Rouge		
<b>Telephone Number:</b>	2253421330		
<b>Agency-Wide PREA Coordinator Information</b>			
<b>Name:</b>	Michele Dauzat	<b>Email Address:</b>	michele.dauzat@la.gov

## AUDIT FINDINGS

### **Narrative:**

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

Acronyms:

- DOC Department of Corrections
- DPS&C Department of Public Safety & Corrections
- DCI Dixon Correctional Institute
- OAS Online Audit System of DOJ
- PCM PREA Compliance Manager
- PRC PREA Resource Center
- DOJ U.S. Department of Justice

Dixon Correctional Institute, Cottonport, LA, is compliant with the U.S. Department of Justice PREA standards.

The on-site PREA audit of the Dixon Correctional Institute (DCI) was conducted 6-8 October 2021 by Department of Justice Certified Auditor William Peck.

An entrance meeting was held October 6, 2021 at 8 a.m., following which the site was physically reviewed. The initial briefing with the warden and executive staff indicated a facility leadership desirous of being compliant with the PREA standards.

**Overview of the Audit Methodology**

This Audit was conducted utilizing the Online Audit System (OAS) integral to DOJ and the PREA Resource Center (PRC) required processes. The PREA audit follows the guidance of dividing the audit process into 3 identifiable segments: the Pre-Onsite phase is primarily policy and documentation reviews, data reviews and preparation. The On-site phase has further documentation review and also emphasizes a site review as well as required specific and random interviews using DOJ protocols. The final phase is for Evidence Review and issuing the Interim or Final Report. Included in this phase is the triangulation of all information and observations received from the documentation, interviews and site review. Audits that have areas found to be non-compliant require Corrective Actions prior to a Final Report and these are coordinated between the facility and the auditor.

The initial meeting was followed by an extensive site review of the facility, a review of relevant documentation, and interviews with staff and offenders according to PRC (PREA Resource Center) requirements and protocols.

**Pre-Onsite Phase**

During the Pre-On-site Audit Phase, the PREA Coordinator provided all policies and procedures for review inside the DOJ OAS system.

The LA DOC maintains an overarching policy regarding Sexual Abuse and Response and DCI maintains additional local specific policy. The auditor and PREA Coordinator had on-going communication for several weeks prior to the audit to prepare for the on-site visit. It became clear during the pre-visit review that Policy component sections were uniformly compliant and that the LA DOC staff has drafted policy to be compliant for all LA DOC facilities; policy parallels very closely, often verbatim, the PREA Standards and checklists for policy.

During the Pre-Onsite Audit Phase, the Auditor requested and reviewed PREA-related policies and also requested the following lists to use in selection of individuals to be interviewed:

1. A comprehensive list of offenders, staff, volunteers, and contractors.
2. Complete roster based on actual population at the beginning of the onsite portion
3. Offenders with disabilities (i.e., physical disabilities, blind, deaf, cognitive disabilities)
4. Offenders who are Limited English Proficient (LEP)
5. Lesbian, Gay, Bisexual, Transgender, and Intersex (LGBTI) Offenders
6. Offenders who reported sexual abuse
7. Offenders who reported sexual victimization during risk screening
8. Complete staff roster



It became clear during the pre-visit review that policy component sections were uniformly compliant and that the staff has drafted policy with the intent to be PREA-compliant for all Louisiana facilities; policy parallels very closely, often verbatim, the PREA Standards and checklists for policy. The Pre-Audit Questionnaire indicated some conflicting numerical reporting data on numbers of investigations but these were clarified upon working with the facility PCM.

Following the opening meeting, the site was physically reviewed. The initial briefing with the warden, executive staff, and DOC PREA Coordinator indicated a facility leadership desirous of being compliant with the PREA standards. The on-site visit, then, focused on actual compliance in operations and whether local training, process and actual procedure mirrored policies.

#### **On-Site Audit**

The on-site visit, then, was focused on actual compliance in operations and whether local training, process and procedure mirrored these policies. The on-site review included documentation review, physical site review and required interviews utilizing DOJ and PRC protocols.

#### **Reviewing Documentation**

Reviewing documentation is a critical component of the audit triangulation process. Before and during the site visit review, the Auditor reviewed various files and documents, as noted below, to evaluate compliance levels of the policies and procedures. Facility information was entered in the DOJ Online Audit System (OAS) and included necessary audit information: the Audit Compliance Tool (ACT) including the Pre-audit questionnaire (PAQ), staff identification, current population. Also included were responses to the PREA Standards folders with policy procedures and secondary documentation. The PREA resource audit instrument for audit prison and jails furnished by the National PREA Resource Center was used for the audit including PRC protocols for interviews of staff and offenders. In summary, there are seven sections including: The PAQ, the audit compliance tool, instructions for audit site review, interview protocols, auditor summary, facility map, and checklist of documentation.

Most documentation was reviewed before arriving on-site, but some specific files were not reviewed until after arrival at the facility (personnel files, investigation files, etc.) The facility has zero notices of non-compliance with local, state, or federal laws or regulations. The below files and documents reviews were used in triangulation of data following the on-site review.

The below files and documents reviews were used in triangulation of data following the on-site review.

1. Staff Handbook
2. Offender Handbook
3. Investigator training certifications
4. Records of PREA intake education received by offenders
5. Volunteer and Contractor training guide
6. Staff training topics and dates training received
7. Volunteer and Contractor Training Records and Topics
8. Staffing Plan
9. Investigation folders
10. Personnel Folders, random, including Volunteer and contractor folders
11. Personnel Background Investigations results
12. Offender folders, randomly selected
13. Standards, Policies
14. Coordinated Response Plan
15. Medical policies



The in brief was followed by an extensive site review of the prison. The site review provided an opportunity for the Auditor to conduct a review of the



different areas of the facility, observe procedures and interactions between staff and offenders, and conduct informal interviews. This aided in gaining an understanding of facility operations and practices as well as insight into the facility's compliance with PREA standards. The Auditor reviewed the entire facility site, escorted by the Assistant Warden/PREA Compliance Manager, and observed the facility configuration, location of cameras and mirrors, staff supervision of offenders, housing room layout including shower/toilet areas, placement of posters and PREA informational resources, security monitoring, offender entrance and search procedures, and offender programming.

Offenders were observed in the living and recreation areas interacting appropriately with each other and staff and while they were engaged in various leisure activities. Offenders were also observed in education, vocational, and various work areas. Information related to the Prison Rape Elimination Act (PREA) and how to report sexual abuse was posted in all housing and program areas. Additionally, signs were posted in offender traffic areas with information regarding contact with advocacy organization LAFASA (LA Foundation Against Sexual Assault) the Statewide advocacy organization that has an MOU with LA DOC. The auditor visited the following departments to observe conditions relating to departmental policy and operations:

DCI Housing areas and Cell Blocks

Medical

Education

Classification

Food Service

Library/Law Library

Programs

Human Resources

Training

Recreation areas

Control Centers

Facility grounds

Cross Gender Supervision

A camera system has been installed in shower and toilet areas due to extensive use of these areas for assaults, stabbings, drug activity and fighting. Since female staff do not enter these areas and since female staff constitute over 80% of correctional staff, these activities often are not able to be otherwise properly monitored. Although the cameras are utilized, the policy that was explained is that they are not active live or monitored and are used only for investigations.

During the discussion of this procedure, it was stated that only males the rank of Major or higher have access to the camera recordings and that they require a restricted password. The auditor had some concerns about accountability and monitoring to ensure these safeguards to basic privacy from cross-gender viewing of extensive potential nudity. The possibility was also discussed that a Deputy Warden could conduct a monthly review of any access to the camera files and reported to the Warden.

The initial facility feedback following the site visit did not include any of these accountability safeguards but only a change to Post Orders to be carried out by each shift Captain. The Warden is now requiring that any access of a senior staff to this camera would require an Unusual Occurrence Report for each instance. This appears an accountable approach since all UORs go through the senior chain of command to the Warden and since any PREA UOR also goes to the Incident Review process. This approach should ensure accountability and ensure the oversight approach desired by the Warden.

The Auditor noted that DCI has group shower spaces and that a visual block is provided at the times designated for separate showers by transgender offenders. Toilet spaces have barriers that limit vision to upper areas of the offender's body.

The Auditor verified that higher ranking staff such as the Assistant Wardens, Majors and Captains make unannounced rounds, documented in the logbook by the control officer.

Staff were aware of the requirement to announce the presence of opposite gender staff and did so in all housing in a timely manner; interviews with offenders and staff supported that the facility ensures these announcements and that this practice is adhered to during daily operation.

No immediately observable concerns related to sexual safety were noted while visiting these areas, excepting some concern over limited supervision

and privacy in the shower areas. The Auditor reviewed the Control Center, talked with the post officers, and observed the coverage of the CCTV monitors.

Each housing unit includes wall mounted telephones for offender use, and information about how to call or write for PREA reporting or assistance is posted in each unit. While conducting the site review, several staff and offenders were informally interviewed and acknowledged receiving training and procedures for reporting sexual abuse and harassment and the right to be free from retaliation. Offenders and staff both knew that they could report sexual safety issues and were aware of external addresses and phone numbers of sources to report or gain assistance with their issues. Posters reporting information and data on advocacy organizations were conspicuously placed.

Training is provided concerning cross-gender pat searches and these searches are presently conducted by female officers on this all-male population, as is allowable in both PREA and DPS&C policies and procedures. Strip searches are conducted by only male staff with the potential policy exception for exigent circumstances, which have not occurred thus far. Staff interviewed were all aware of the prohibition of physically examining a transgender or intersex offender to determine genital status.

Staff Training receives significant emphasis and appears more than compliant at all levels. All staff receive the 3-week initial training at Angola at the Louisiana State Penitentiary and also an additional week at DCI. LA DOC is in the process of doubling Academy training to 6 weeks. Specialized staff complete NIC or DOC-sponsored specialty training in their area (e.g., investigators, mental health, etc.). All staff, including volunteers and contractors, receive annual Refresher training and line staff also receive routine training at shift turnover.

The following description of relevant programmatic services and functional areas summarizes findings and observations.

**Library Services:** DCI leisure library is open seven days per week and offenders are provided the opportunity to make special requests for books since DCI is part of the Louisiana Public Library Interagency Loan program. Offenders in restricted units are provided a list of available books and the books are then delivered to them. The Law Library has offender counsel substitutes who help with legal research. All offenders access legal library services by a request to the Legal Programs office.

**Medical:** Medical care is provided at DCI 24/7 by medical staff, who are state employees, and include RNs, LPNs, Doctors and Nurse Practitioners. Specialized medical services are also provided via medical contracts and include dental, Optometry and Radiology. Offenders are within sight or sound of staff and there are also offenders assigned to assist long-term medical in-patients. Within the DCI medical program is a separate large contracted dialysis program for all DOC offenders.

Forensic examinations are sent to Our Lady of the Lake (LOL) Regional Medical Center or Lane Memorial Hospital for SAFE/SANE assault protocols and examinations. Testing, prophylactic treatment, and follow up for sexually transmitted diseases is provided if indicated at no cost to the offender. All victims and predators are referred to Mental Health following any incident. Interactions with the Medical or Mental Health staff are clearly documented in the offender medical record, to include initial and follow-up treatment.

The intake process consists of staff from Medical, Mental Health, Security and Classification meeting with each new arrival. An intake assessment for each offender is completed at this time to determine if there are any situations that need to be immediately addressed or scheduled for near-term response. This group makes recommendations regarding their areas and program/housing outcomes etc., and Classification department coordinates record and file entries. Individual plan formulation is jointly determined by security, mental health and classification staff.

Offenders are asked questions related to PREA by the Mental Health Staff, and medical staff determine if the offender has a situation that would require him to be scheduled for an early medical appointment. Emergent situations are handled immediately, and non-emergent situation are handled by scheduling routine appointments for the offenders.

Each offender is given information on how to access health care services in English or Spanish and, if an offender is deemed to be illiterate, instructions are given orally by medical staff. As verified during interviews, staff ensure all offenders understand the information, providing one-on-one assistance as needed.

**Mental Health:** DCI's Mental Health department has 4 Social Workers., two of whom also function as the Mental Health Director and Assistant Mental Health Director. The mental health department provides services in Crisis Intervention, various groups and individual counseling according to Treatment Plans and as needed.

General Population offenders access Mental Health services by request. Segregation offenders access mental health by request to the Social Worker during their routine visits to segregation. Offenders are generally seen per treatment recommendations and by the Psychiatrist at two-month intervals. All emergencies are responded to within 30 minutes. During working hours, the offender is evaluated face to face within 30 minutes.

**Recreation:** Outside exercise yards provide extensive capabilities and there is a full-size gymnasium with a regulation size basketball court. There are additional recreation yards adjacent to each housing unit. PREA reporting notices were also available in the gymnasium area for offender view and reference.

**Religious Programming:** The Senior Chaplain for DCI has one full time chaplain, one contract chaplain and- currently- 26 approved volunteers. Prior to the COVID pandemic when programs were severely restricted, DCI had over over 900 religious volunteers but many of them came only a few times a year.

The warden and the chaplain must approve all volunteers and volunteers must complete both volunteer and PREA training and undergo background

records checks prior to being approved. DCI leadership has a plan to reinstate more volunteer programs and is completing development of an online training program that will return many previous volunteers to an approved status.

**Social Services:** DCI provides social services and counseling with the use of classification staff, social worker staff, chaplaincy staff, health care staff and volunteer staffed programs. DCI Re-entry initiatives provide assessment, identification, and linkage for offenders with community services.

**Youthful Offender Program:** Youthful offenders (age 19 or younger) numbered 2 at the time of the audit, both interviewed. They are housed in a separate secure unit that enables meeting youthful offenders PREA requirements. The unit was toured and was one which offered separate living space, recreation, and program space. When youthful offenders are in shared areas with adults (meals, chapel, etc.), they sit apart, and specific staff remain with the youth and ensure no contact with adults occurs. Their programs were wide-ranging and appear well thought out for this population, but the program staff is reducing since DOC is transferring this program to a new facility with enhanced mental health programs. During interviews, it was evident that this program enforces the requirements of supervision, oversight and programs for youthful offenders.

If one were placed in segregation, the facility has developed a process that places any them in the first (single) cell immediately adjacent to the staff member and never with a cellmate. This cell has camera coverage as well.

## **Interviews**

The major portion of the site audit consisted of conducting structured interviews with specialized and randomly selected staff and also with randomly selected and specific categories of offenders (LGBTI, Youthful Offenders, reported victims of abuse, disabled in any area, or anyone facing issues that increase vulnerability, etc.). All staff and offenders interviewed were very cooperative during the interview process.

These interviews with both staff and offenders served to verify observations and/or to ask the Standards' interview questions concerning facility operations. The major portion of the site audit consisted of conducting these structured interviews with specialized and randomly selected staff and also with random and targeted categories of offenders (LGBTI, reported victims of abuse, etc.).

The auditor was provided a private office room in the administrative area from which to work and conduct required staff interviews. Other formal and confidential personal interviews with facility staff, offenders, and contractors were conducted in private offices inside the security perimeter.

The offenders and staff were well aware of PREA and the zero-tolerance policy of the Agency. They all indicated they had received written information either on their arrival or on the housing units for those that have been at the facility for a considerable amount of time. LGBTI offenders interviewed reported that they felt safe and the significant number of older offenders responded in a similar vein.

## **Offender Interviews**

Offenders were interviewed using the recommended DOJ protocols that emphasize their knowledge of a variety of PREA protections generally and specifically their knowledge of reporting mechanisms available to offenders to report abuse or harassment. The interviews of offenders reflected that they were aware of and understood the PREA protections and the agency's zero-tolerance policy. Offenders receive written materials at intake and a video that provides detailed information about PREA protections, the multiple ways to report sexual abuse or harassment, and ways to protect themselves from abuse. During the interviews, the offenders indicated they understand various ways to report abuse and discussed the posters throughout the facility with the telephone numbers to call to report sexual abuse or harassment. Offenders consistently indicated to the Auditor that, while there were fights, altercations and conflicts that occurred, they felt safe from any sexual assault in the facility.

There were 43 offenders formally interviewed during the site visit, 25 random selections and 18 from targeted offender categories who represented 21 targeted categories. There were a number of observations in interviews about increasing aggression and disrespect from younger arriving offenders but there were no general complaints about treatment or fairness of staff. The offenders interviewed are aware of the PREA education programs. There were no offenders reported in Involuntary Segregation or as limited- or non—English speakers. There were a large number of offenders with physical disabilities, many due to DCI being a dialysis center for LA DOC, so the number of these offenders interviewed was increased to account for groups with no representation.

Offenders interviewed were selected at random from every housing area as well as from various program and work areas. Offenders interviewed felt safe and most remarked that at no time had they felt that their sexual safety was at risk. All offenders felt that staff would take very seriously any report of sexual abuse, assault, harassment, or retaliation. All offenders were aware, at a minimum, that they could make a report to any staff or to Crime Stoppers or have their family or attorney report for them. Many offenders effectively communicated additional methods of reporting as well, adding reporting to an outside third party, filing a grievance, writing to outside agencies, and submitting anonymous reports in writing. This information is also available in facility policy as well as the offender handbook.

Almost all stated that they would feel comfortable directly telling a staff member as their first choice of action and would then call the hotline if no

action was taken. All offenders made mention of the reporting phone numbers and the location of the posters, and that they had received information in regard to PREA upon intake and were asked those questions again if they had been there long enough to go through the annual review process.

Offenders communicated that appropriate announcements were made by opposite gender staff as required by the standard and they were never naked in view of female staff, unless there was an emergency. It was noted by every offender interviewed that female staff do not work or tour in showering/toileting areas. Through interview and observation, it was verified that privacy screens are used in the shower and toileting areas and there were no cases of staff viewing that were non-security related.

Transgender offenders interviewed reported few concerns in regard to procedures utilized or being offered showers at a separate/designated time except that one transgender offender indicated some offender harassment that occasionally violated shower privacy.

Offenders who had made reports of sexual abuse stated that staff took immediate action to ensure they were safe, while initiating an investigation and providing information about the outcome. Those reporting said that they felt comfortable speaking with staff about this matter.

The offenders talked freely with the auditor.

#### **Offenders Interviewed**

2 Youthful Offenders

4 Offenders who reported victimization during risk screening

3 Offenders who identify as LGB

3 Transgender offenders

2 Offenders who reported an abuse

5 Physical Disability

2 Cognitive Disability

25 Random Offenders

#### **Staff Interviews**

The Auditor interviewed a wide range of staff that included both executive and line staff for the facility. Specialized staff interviewed included executive leadership, Medical and Mental Health Supervisors, higher-level security supervisors, as well as staff from Programs, Human Resources, Training, Classification, Intake Staff, as well as volunteers. Interview data is summarized at the end of this narrative.

Staff was questioned using the DOJ protocols that question their PREA training and overall knowledge of the agency's zero-tolerance policy, reporting mechanisms available to offenders and staff, the response protocols when a offender alleges abuse, and first responder duties. It is not unusual that staff members of this small group routinely had responsibilities that spanned several job functions.

It was also evident from interviews that all staff receive appropriate training concerning PREA and the zero-tolerance policy during initial training as well as annual and also regular refresher training. All staff were aware of their responsibilities for reporting sexual abuse, sexual harassment, staff negligence and any retaliation for reporting. Staff interviewed were familiar with the expectations of their duties as well as with the procedures for evidence preservation.

The Auditor interviewed 39 staff in the course of the audit, 12 randomly selected staff; 19 specialized staff; and 6 HQ/Facility leadership staff, and 2 contractor interviews. The volunteer program is currently preparing to begin a resumption following the pandemic stand-down of the program and required volunteer training is in preparation. All facility staff interviewed indicated they had received detailed PREA training and could articulate the meaning of the agency's zero tolerance policy. In interviews, all agency staff expressed satisfaction with PREA training and felt they knew their required actions if incidents were to occur, and they could clearly articulate the steps to follow if they were the first responder.

Staff were knowledgeable about their roles and responsibilities in the prevention, reporting, and response to sexual abuse and sexual harassment and easily articulated the variety of mechanisms for offenders and staff to use to report. New custody staff are required to attend a 3-week pre-service Training Academy, 2 weeks at Angola (LA. State Penitentiary) and 1 subsequent week at DCI; and noncustody staff attend 1 week of training. The DOC is currently moving to a 6-week Training Academy which will double the amount of correctional officer training.

#### **Staff Interviewed**

1 Agency Head

- 1 Agency PREA Coordinator
- 1 PREA Compliance Manager 1
- Warden
- 1 Human Resources Manager
- 1 Contract Administrator
- 1 Chief Investigator, Agency
- 1 Investigator, Facility
- 2 Sexual Abuse Incident Review Team members
- 1 Retaliation Monitor
- 1 Staff Who Supervise Youthful Offenders
- 1 Program Staff Who Supervise Youthful Offenders
- 1 Staff who Performs Risk Screening
- 1 Intake Supervisor
- 3 Medical and Mental Health staff
- 3 Intermediate or higher-level Supervisors who make Unannounced Rounds
- 2 First Responders
- 2 Contractor
- Crisis Agency Representative
- SAFE/SANE representative
- 2 Staff Who Supervises Segregated Housing
- 12 Randomly selected staff

The officers on the shifts stated they feel safe working at Dixon Correctional Institution, and all had been through PREA training. The officers generally felt that the reason that there are not a lot of incidents at the facility is that support staff and officers make sure they talk with the offenders whenever the offenders have issues or questions. In interviews, correctional officers and staff expressed satisfaction with their PREA training and felt they knew their required actions if incidents were to occur.

All staff interviewed knew their respective areas of responsibility regarding PREA and affirmed compliance with the applicable PREA standards. All uniformed staff are trained as first responders and are familiar with their duties. There are SAFE or SANE-trained staff at the nearby OLOL Medical Center for forensics.

**Post-Visit Evidence Review**

The post-audit phase consisted of triangulating all data and input received, reviewing interview data in detail, and merging this data with site review data to utilize in a final review of the ACT submission. Conclusions were then used to complete the OAS sections. Questions that arose about procedures or data needed for clarification were referred to the facility and the responses are incorporated in this report.

The Auditor had been provided with extensive files before and during the audit for review to support the conclusion of compliance with the PREA. The onsite interviews and observations supported compliance. In addition to the site visit and the interview process, the Auditor again reviewed the Auditor Compliance Tool data submitted by the facility and the policies related to PREA compliance.

The post-audit phase consisted of triangulating all data and input received, reviewing interview data in detail, and final review of the PAQ submission. Questions that arose about procedures or data needed for clarification were referred to the facility and the responses are incorporated in this report. The facility staff was cooperative and professional and no barriers to a successful audit were encountered.



## AUDIT FINDINGS

### Facility Characteristics:

The auditor's description of the audited facility should include details about the facility type, demographics and size of the inmate or resident population, numbers and type of staff positions, configuration and layout of the facility, numbers of housing units, description of housing units including any special housing units, a description of programs and services, including food service and recreation. The auditor should describe how these details are relevant to PREA implementation and compliance.

Rated Capacity: 1800

Actual Population: 1669

Average Population Last 12 Months: 1680

Average Length of Stay: 23.3 months

Security/Custody Level: Maximum, Medium, Minimum

Ages of Offenders: 16-80 (includes 2 Youthful Offenders)

Gender: Male

Full-Time Staff: 475 Who May Have Contact With Offenders

The Louisiana Department of Public Safety and Corrections (LA DPS&C), Dixon Correctional Institute (DCI) is an 1800 bed medium security facility located in Jackson, LA., a part of East Feliciana Parish, Louisiana.

The physical plant came on line and started receiving offenders in 1976. The facility currently consists of 15 buildings, including the Administration building. Inside the secured perimeter DCI has 5 units with 22 open dormitories and 2 multiple occupancy cellblocks. DCI's general population dormitory units house minimum and medium custody offenders. Each of the housing unit tiers open to a central rotunda officer control room. There are 96 Administrative and Disciplinary Cells. The facility (and the DOC) are actively studying how to best incorporate the current guidance on changing approaches to restrictive housing.

Dormitories used as offender housing areas are managed from smaller control centers located immediately adjacent to those areas. Housing unit officers in the units have a direct view of their area of responsibility. Offender movement is controlled and access into restricted areas requires staff authorization.

During the tour, camera placement, sight lines, and staff placement were noted to assist in determining standards compliance. There are 350 cameras spread throughout areas where security violations are more likely to occur. Most retention times are around 30 days but it depends on the number of recorded events that activate a recording. The control Center monitors these cameras and the command post can also monitor them.

IMPACT of COVID: The population has been reduced during the COVID pandemic as movement to and within the corrections system, as well as community court schedules, have been reduced. Staffing has also been impacted by COVID, especially in medical support areas because the pandemic has introduced many higher-paying opportunities for medical personnel at all levels.

## AUDIT FINDINGS

### Summary of Audit Findings:

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

Number of standards exceeded:	0
Number of standards met:	45

At the end of the audit on-site portion, October 8, 2021, the PREA Auditor conducted a preliminary out brief with the Warden, the PCM, and other facility leadership to give them a general overview of the process and to thank them for their participation. The timeline and expectations for the remainder of the audit were discussed. It was explained that any areas found not to meet standards would need to be corrected and the auditor would be working closely with the PREA Coordinator to accomplish compliance. The willingness of all staff involved to accomplish PREA compliance was acknowledged and their eagerness to become compliant was evident.

An interim report was issued November 8, 2021. Issues encountered and discussed at the outbrief were:

**Cross Gender Supervision.**

A camera system has been installed in shower and toilet areas due to extensive use of these areas for assaults, stabbings, drug activity and fighting. Since female staff do not enter these areas and since female staff constitute over 80% of correctional staff, these activities often are not able to be otherwise properly monitored. Although the cameras are utilized, the policy that was explained is that they are not active live or monitored and are used only for investigations. The auditor had some concerns about accountability and monitoring to ensure safeguards to basic privacy from cross-gender viewing of extensive potential nudity, so the issue of accountability and senior leadership oversight was discussed at the outbrief.

The Warden is now requiring that any access of a senior staff to this camera would require an Unusual Occurrence Report (UOR) for each instance be sent to Investigations and the PREA Compliance Manager. Additionally, the Warden is restricting access to staff of the rank of Major or above and having an information system report generated each month to show all access to the system. This appears an accountable approach since all UORs go through the senior chain of command to the Warden and since any PREA UOR also goes to the Incident Review process. This approach will ensure accountability and ensure the approach desired by the Warden.

**Involuntary Segregation** of both the alleged predator or aggressor as well as the offenders who filed an allegation of being the victim of abuse. The facility has provided records reflecting the expeditious return of victims to their original housing unit and a reduced status after Board consideration and review rather than retaining them through an investigation of an involved predator. The DOC policy IG-B-4 also clearly specifies the approach to programs and privileges, meets PREA standards, and states "Offenders in Preventative and Investigative Segregation have access to programs and services that include, but are not limited to the following: educational services, commissary services, library services, social services, behavioral health, and treatment services, religious guidance, and recreational programs. DCI staff is following DOC policy IG-B-4 and has resolved this policy guidance and process issue and is compliant.

**Transgender experience:** A second area of discussion was the overall programmatic approach to the small number of transgender (3) offenders at DCI. All three perceived negative treatment, some from staff but primarily from other, mostly older, offenders. Their issues ranged from female clothing items issues to mental health and medical support. All 3 offenders reported a concern that their medical program was not following the gender dysphoria program approved by DOC. The auditor requested that their Gender Dysphoria treatment plans be reviewed to ensure that their medical treatment plans were being followed as approved. DCI provided medical forms reflecting the approved programs and that they are being followed. This issue is compliant.

**Summary:** Dixon Correctional Institute is found to be compliant with U.S. DOJ PREA standards. In summary, after reviewing all pertinent information, the site review, and after conducting offender and staff interviews, the Auditor found that department and agency leadership have clearly made standards compliance a high priority and have devoted significant resources to policy development, training of staff, and education of offenders on all the key aspects of the PREA. Discussions with leadership and facility management reinforced the agency's commitment to ensuring the sexual safety of offenders and staff in the facility.



**Standards****Auditor Overall Determination Definitions**

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

**Auditor Discussion Instructions**

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

<b>115.11</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>The DPS&amp;C Secretary has appointed a Department PREA Coordinator who has oversight of activities to develop, implement and oversee DPS&amp;C’s efforts to comply with the PREA Standards in all units.</p> <p>“It is the policy of DCI to provide a safe, humane and appropriately secure environment, free from threats of sexual abuse and sexual harassment for all staff, volunteers, contractors, and inmates by maintaining a program of prevention, detection, response, reporting, investigating and tracking of all alleged and substantiated incidents of sexual abuse. DCI has zerotolerance for incidents of sexual abuse and sexual harassment.” DCI’s designated Asst. Warden serves as the PREA Compliance Manager to coordinate efforts to comply with the PREA standards. The PREA Compliance Manager (PCM) reported in the interview that he has sufficient time and authority to coordinate the facility’s efforts to comply with PREA Standards.</p> <p>The Department has adopted a zero-tolerance policy toward victimization and sexual abuse within all facilities through the PREA Program. Full investigations, appropriate reporting, and compliance to the standards program will be treated as a top priority by administrators and investigators.</p> <p>Staff who violate this regulation may receive disciplinary action, up to and including termination.</p> <p>The PREA Compliance Manager (PCM) serves as a liaison between DCI and DPS&amp;C’s PREA Coordinator and other appropriate Headquarters staff and is responsible for monitoring PREA related activities, etc. The PREA Compliance Manager (PCM) ensures that each requirement of Department Regulation C-01-022, on Prison Rape Elimination Act (PREA, including verification that all training, screening, assessments, reporting, and monitoring is accomplished in a timely manner. During interviews, it was noted that the PCM had a strong knowledge of all requirements as well as the facility's procedure in accordance with each. During interviews with staff, all staff was well aware of who was assigned this duty. Additionally, the offenders interviewed were aware of the facility PREA Compliance Manager and felt that this staff member would address any concerns that were brought forth.</p>

<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>The Agency does contract for confinement, not DCI per se. DCI does contract for services and some personnel, however, and the contracting agent interviewed indicated that part of her job is to ensure every contract is totally clear on PREA requirements, training, etc. The Agency PREA Coordinator affirmed that they do contract out confinement and all PREA requirements are included in the contracts; further, she noted that all contractors are routinely audited by the State agency and the audit includes PREA requirement compliance.</p> <p><b>There are currently 10 DCI contracts that have been renewed or approved since the last PREA audit, and all of those require the agency to monitor contractor compliance.</b></p>

<b>115.13</b>	<b>Supervision and monitoring</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Department Regulation No. A-02-018 (Institutional Staffing) requires each facility to develop and document a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse. When designing new units, planning substantial expansions or modifications to existing units or when updating a video monitoring system, the Warden is tasked to consider how such expansions, modifications, or updates would enhance the unit’s ability to protect inmates from sexual abuse</p> <p>When calculating adequate more long-term staffing levels and determining the need for video monitoring, each unit is required to take into consideration PREA elements:</p> <ul style="list-style-type: none"> <li>• 1) Generally accepted detention and correctional practices;</li> <li>• 2) Any judicial findings of inadequacy;</li> <li>• 3) Any finding of inadequacy from Federal investigative agencies;</li> <li>• 4) Any findings of inadequacy from internal or external oversight bodies;</li> <li>• 5) All components of the unit’s physical plant (including “blind spots” or areas where staff or inmates may beisolated);</li> <li>• 6) The composition of the offender population;</li> <li>• 7) The number and placement of supervisory staff;</li> <li>• 8) Institution programs occurring on a particular shift;</li> <li>• 9) Any applicable State or local laws, regulations, or standards;</li> <li>• 10) The prevalence of substantiated and unsubstantiated incidents of sexual abuse;11) Any other relevant factors.</li> </ul> <p>Interviews with the Warden, PREA Compliance Manager, and senior staff also indicate that all incident data is considered in staffing reviews, but all interviews noted that there are few sexual assault incidents to actually review; and the Sexual Assault Incident Reviews normally focus more on staffing, camera technology, blind spots and population characteristics.</p> <p>In circumstances where the staffing plan is not complied with, the Warden or designee has to document and justify all deviations from the plan. This document is forwarded to the Agency PREA Coordinator Compliance Manager for retention purposes.</p> <p>The Warden or PREA Compliance Manager assesses, determines, and documents whether adjustments are needed to the staffing plan, deployment of video monitoring systems, or other monitoring technologies, and to determine the resources the facility has available to commit to ensuring adherence to the staffing plan.</p> <p>In addition to and along with other rounds, Supervisors conduct and document unannounced rounds on the night and day shift to identify and deter staff sexual abuse and sexual harassment. Staff is prohibited from alerting other staff members that these supervisory rounds are occurring unless such announcement is related to legitimate operational functions.</p> <p>Each Warden develops a PREA staffing plan and submits annual updates to DPS&amp;C’s PREA Coordinator. The staffing plans determine and document whether adjustments are needed to the staffing plan, deployment of video monitoring systems or other monitoring technologies, and the resources the facility has available to commit to ensuring adherence to the staffing plan.</p> <p>The average daily population since 2018 has been 1650 and the staffing plan is based on an average of 1800.</p>

<b>115.14</b>	<b>Youthful inmates</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>

**Auditor Discussion**

All inmates under the age of 18 years housed in any state DOC correctional facility are considered youthful inmates (YO) and Department policy statewide recognizes that:

- No youthful offender may be placed in a housing unit in which the offender will have contact with any adult offender through use of a shared day room or other common space, shower area, or sleeping quarters;
- Outside of housing units, the Department shall either maintain "sight and sound separation" between youthful inmates and adult inmates to prevent adult inmates from seeing or communicating with youthful inmates or provide direct staff supervision when youthful inmates and adult inmates are together.

DCI is a designated facility for Youthful Offenders (YO) and, as such, ensures adherence to all PREA requirements designed to protect YOs. DCI houses a youthful offender program for male inmates under the age of 18 years old. The departmental policy designates the requirement of youthful inmates to be housed separately from adults as well as outlines the requirements for appropriate supervision as well as opportunities for programming and recreation.

There were only 2 YO's in the program during the audit.

Observation of the youthful offender program revealed appropriate housing separate from all adult inmates and sharing a building only with the DOC Dialysis program. The housing area is separated from the main walkway with a gate with access granted only by staff. The housing area is small and open with good lines of sight, with staff on-site and appropriate video monitoring. A recreation area for use only by youthful inmates is connected to the housing area as well as the building used for programming and education.

During each meal period, staff escort all youthful inmates as a group to the facility's main dining hall. Staff provides direct supervision at any time youthful inmates may be within sight/sound of adult inmates. There are a few educational classes where YOs are in the same area as adults but they are seated separately and have a dedicated correctional officer with them.

There is ample opportunity to participate in programs and recreation daily. Appropriate supervision is being provided by staff as required by policy and as outlined in facility procedures. All staff interviewed were well versed on the requirements of monitoring, supervision, safety and separation. Youthful inmates were aware of the facility PREA program.

The YO program will shortly be relocated by DOC to a new facility with additional mental health resources and staffing has already begun transitioning.

<b>115.15</b>	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

Cross-gender pat searches are authorized for use with male inmates and staff is trained to perform them, however, crossgender strip and body cavity searches are not authorized except in exigent circumstances and have not occurred. Crossgender strip searches and visual body cavity searches, if done in exigent circumstances, would be documented in the appropriate logbook and an Unusual Occurrence Report (UOR) would be completed. There have been none in the past 12 months.

Interviews with both staff and inmates stated that inmates are able to shower, perform bodily functions, and change clothes without a non-medical staff of the opposite gender viewing their buttocks or genitalia, except in exigent circumstances or when such viewing is incidental to routine rounds. The only camera cells are 2 suicide cells per unit and there can be operational cross-gender viewing of monitors for those 2 cells; however, the inmates are issued suicide gowns and the camera captures only vertical coverage due to its ceiling location.

Upon entering a housing unit, all cross-gender staff announces their presence. Female staff were comfortable and noted to announce their presence prior to entering an area in which an inmate may be disrobed. Although females are the largest staff segment, at least 1 male staff was available in all housing areas and it was stated that they conduct security rounds in the shower/toilet areas as necessary in addition to having the privacy barriers. Upon interview with inmates, the information provided and regularly supported stated that female staff does not enter inmate areas in which nudity may be a concern, but in the event they did in exigent circumstances, appropriate notice was provided.

No search or physical exam is permitted when the sole purpose of the search or physical exam is to determine the offender's genital status. Random staff and medical staff both stated in interviews that only medical staff could perform any similar examination.

A camera system has been installed in shower and toilet areas due to extensive use of these areas for assaults, stabbings, drug activity and fighting. Since female staff do not enter these areas and since female staff constitute over 80% of correctional staff, these activities often are not able to be otherwise properly monitored. Although the cameras are utilized, the policy that was explained is that they are not active live or monitored and are used only for investigations. The auditor had some concerns about accountability and monitoring to ensure these safeguards to basic privacy from cross-gender viewing of extensive potential nudity, so the issue of accountability and senior leadership oversight was discussed at the outbrief.

The Warden is now requiring that any access of a senior staff to this camera would require an Unusual Occurrence Report for each instance. Additionally, the Warden is having an information system report generated each month to show all access to the system. This appears an accountable approach since all UORs go through the senior chain of command to the Warden and since any PREA UOR also goes to the Incident Review process. This approach will ensure accountability and ensure the approach desired by the Warden.

<b>115.16</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>



Policies B-08-010 (Americans with Disabilities Act) and B-08-018 (Effective Communication with the Hearing Impaired) are two of the major pieces of guidance from the Departmental level.

DPS&C Policy is that all facilities take appropriate steps to ensure that inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the DPS&C's efforts to prevent, detect and respond to sexual abuse and sexual harassment. DCI meets these requirements and takes a number of additional steps due to the growing number of older inmates with numerous challenges.

- DCI provides interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

- Certified offender interpreters may be used to explain the policies and procedures for reporting; however, the Department does not rely on offender interpreters, offender readers, or other types of offender assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the offender's safety, the performance of first- response duties or the investigation of the offender's allegations.

DCI utilizes SpeakEasy Telephone Interpreting Services for all foreign language interpreting needs and each facility has provisions to purchase this service.

Appropriate steps are required to ensure that inmates with disabilities deaf, hard of hearing, blind, have low vision, intellectual disabilities, psychiatric disabilities, speech disabilities, limited English proficient, or limited reading skills), have an equal opportunity to participate in or benefit from all aspects of the facilities efforts to prevent, detect and respond to sexual abuse and sexual harassment. Written materials are provided for inmates with hearing disabilities, access is provided through SpeakEasy interpreter access program for non- or limited English proficient inmates and video presentations are available for inmates with limited reading skills as well as staff assistance. The PREA information pamphlet is available in braille as well as in audio format for inmates that are blind or have low vision.

Certified offender interpreters, by policy, may be used to explain the policies and procedures for reporting when delay might create any kind of threat or danger, however, in the past year, the facility reports no instances where interpreters or readers were used.

Offenders needing reading assistance are provided information verbally at intake by correctional, medical, and mental health staff.

<b>115.17</b>	<b>Hiring and promotion decisions</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

In the past 12 months, there were 10 contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with inmates, a total of 10 contractors.

As indicated by interviews with the PREA Compliance Manager and the Human Resources (HR) staff member, and a review of 6 random personnel files, DCI does not hire, promote, or enlist the services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility or other institutions. Per policy, there shall be no hiring, detail, or promotion of an applicant, employee, or contractor 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; Has been civilly
- or administratively adjudicated to have engaged in the above conduct.

Any incidents of sexual harassment are a determining factor as to whether to hire or promote, or to enlist the services of a contractor.

Prior to hiring, detailing, or promoting any employee/applicant or enlisting services of a contractor who may have contact with inmates DCI conducts criminal background checks in accordance with Department Regulation A-02-022.

Prior to hiring, the Human Resources Office contacts each applicant’s prior community confinement facility, jail, lockup, and/or prison employers. An Authorization to Contact Previous Employers is required and completed by all applicants prior to the effective date of hire. Applicants for hire, detail to special duty, or direct promotion must also answer these questions prior to the effective date of hire or promotion.

All applicants (including promotions) are required to answer verbal and written questions relative to previous misconduct described in 115.17(a), according to interviews with supervisory and HR staff. Applicants must notify Human Resources if or when such charges have been brought against them. Current employees must notify their immediate supervisor. The form “PREA Requirements for Applicants and Employees Being Considered for Hire, Detail to Special Duty and/or Promotion” is utilized upon hire for this purpose.

Each employee has a personal responsibility to disclose to the Warden within 72 hours, any such conduct of which he/she accused, charged, and/or convicted. Applicants and employees who fail to disclose this information are subject to disciplinary action up to and including termination.

Unless prohibited by law, information regarding substantiated allegations of sexual abuse or sexual harassment involving current or former employees upon receiving a request from a community confinement facility, jail, lockup, prison, juvenile facility, or other institutions for whom such employee has applied to work is provided. HR staff interviewed also indicated they have received information in all hiring reference requests they have sent out.

There have been 173 persons hired this past year who had criminal background checks and there was also 10 service contract staff where criminal background checks were conducted. Both random staff interviews and contractors interviewed indicated these had been done and they were aware of them when they occurred. Medical staff turnover is significant right now because it is being impacted by higher-paying pandemic-related opportunities in all areas. Additionally, some line staff challenges exist when oil/energy field hiring cycles increase their hiring.

<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

The warden and PREA Coordinator interviews both indicated that part of recent years' funding was used for visual barriers in shower and restroom facilities and the remainder was used to add a few needed cameras. Upon the availability of appropriate funding for individual cameras, all areas of the facility are considered, taking into account available staffing, blind spots, line of sight and effective monitoring to ensure that each is utilized in a manner most effective in protection of inmates. Multiple staff members are involved in the strategic planning of the installation of additional cameras as they become available.

When designing new units, planning substantial expansions or modifications to existing units or when updating a video monitoring system, the Warden stated he does consider how such expansions, modifications or updates would enhance the unit's ability to protect inmates from sexual abuse.

115.21	<p><b>Evidence protocol and forensic medical examinations</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>There was 1 forensic exam required this past year and it was completed by a SANE at the Lane Memorial Hospital.</p> <p>DCI Evidence Protocol and Forensic Medical Examinations Policy:</p> <ul style="list-style-type: none"> <li>· The Investigative Service Office investigates allegations of sexual abuse and follows evidence collection protocols as outlined in DCI policy 02-01-007 – Crimes Committed on the Grounds of DCI.</li> <li>· All victims of sexual abuse have access to a forensic medical examination off-site at a local hospital at no cost to the victim, where evidentiary or medically appropriate.</li> </ul> <p>Examinations performed will be conducted by individuals that have received Sexual Assault Forensic Examiners (SAFE) or Sexual Assault Nurse Examiners (SANE) training or by qualified medical practitioners. No forensic medical exams are done on-site. All forensic exams are transported to local hospitals to allow for a SAFE/SANE-certified health care professional to perform the assessment. Generally, the facility uses Lane Memorial Hospital, which is closer, but could also use Our Lady of the Lake if necessary, further away but also a larger hospital.</p> <ul style="list-style-type: none"> <li>· SAFE and SANE training certificates are provided to the Training Department for training credit and documentation of training.</li> <li>· Inmates who are victims of sexual abuse have access to victim advocates on staff and to staff through LaFASA (Louisiana Foundation Against Sexual Assault), the state-wide agency tasked with coordinating Louisiana services to victims at the local community level and also to the STAR (Sexual Trauma Awareness and Response) program in Baton Rouge, both part of an active MOU with LA DOC.</li> <li>· Inmates may request a victim advocate on staff or from a community-based organization to accompany and support through the forensic medical examination, investigatory interview, and to provide emotional support, crisis intervention, information, and referrals.</li> <li>· Any investigations that indicate criminal activity cannot be handled at the facility and are transferred to the East Feliciana Parish Sheriff’s Office for handling and they use the same standards of investigation as 115.21 (a) – (e).</li> </ul> <p>Victim Advocates are qualified staff members or community-based staff from a rape crisis center who have been screened for appropriateness to serve in the role of a victim's advocate and have received education concerning sexual assault and forensic examination issues in general. Staff victim advocates have documented training. However, Victim Advocates are used only to prevent gaps until a victim can reach the hospital and also until they can arrange external Victim Advocates.</p> <p>All conversations between the Victim Advocate and the alleged victim remain confidential except when:</p> <ul style="list-style-type: none"> <li>• Disclosure of confidential information is necessary to protect the victim or another (staff or offender) from potential harm;</li> <li>or</li> <li>• The identity of an otherwise unknown alleged sexual predator is revealed.</li> </ul> <p>The Victim Advocate does not prepare or submit an Unusual Occurrence Report based upon conversations or functions performed while in the role of Victim Advocate.</p>
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115.22	<p><b>Policies to ensure referrals of allegations for investigations</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p>
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The Department has adopted a zero-tolerance policy toward victimization and sexual abuse through the PREA Program. Full investigations, appropriate reporting, and compliance to the standards program are treated as a top priority by administrators and investigators. During the past 12 months, there were 30 allegations of sexual abuse or harassment, and all 30 received administrative investigations, and none received criminal investigations. All were completed.

The Investigators ensure that an administrative and/or criminal investigation is conducted in all cases of sexual abuse and sexual harassment they receive.

Claims made which are out of the scope of the training provided to DCI investigators would be referred for investigation to the East Feliciana Parish Sheriff's Office. The case file would show it was referred to the Sheriff's Office.

<b>115.31</b>	<b>Employee training</b>
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

There were 173 new staff hired last year and 10 contractors brought in and all received required training, including:

- • Zero-tolerance policy for sexual abuse and sexual harassment;
- • How to fulfill their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
- • The rights of inmates and employees to be free from sexual abuse and sexual harassment;
- • The rights of inmates to be free from sexual abuse and sexual harassment;
- • The rights of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- • The dynamics of sexual abuse and sexual harassment in confinement;
- • The common reactions of sexual abuse and sexual harassment victims;
- • How to detect and respond to signs of threatened and actual sexual abuse;
- • How to avoid inappropriate relationships with inmates;
- • How to communicate effectively with inmates including, gay, bisexual, transgender, intersex, or gender nonconforming;

The training provided is geared to adult male inmates. Any employee who transfers from a female institution receives a 40-hour orientation to acclimate them to the differences in gender protocols.

All employees have trained annually on PREA and the current sexual harassment policies and procedures and are required to sign a training roster as verification of their attendance and understanding of the training. All current staff and new hire employees sign the Sexual Assault and Sexual Misconduct with Inmates Acknowledgement Form and the Malfeasance in Office Form and both forms are maintained in the employee's personnel file. During interviews with staff, it was verified that training is conducted and attended as required.

The Department provides Correctional Officers with refresher training annually, and all other employees refresher training every two years, to ensure that all employees are aware of current sexual abuse and sexual harassment policies and procedures.

All security staff are trained 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.

Training also includes specialized training for medical and mental health staff, as well as for Investigators. Medical staff employed by the agency have received appropriate training to assist them in arranging for the conduct of forensic examinations but they do not perform them. The agency documents that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere.

Medical and mental health care practitioners also receive the training mandated for employees under §115.31 or for contractors and volunteers under §115.32, depending upon the practitioner's status at the agency but all include:

- Zero-tolerance policy for sexual abuse and sexual harassment;
- How to fulfill their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
- The rights of inmates and employees to be free from sexual abuse and sexual harassment;
- The rights of inmates to be free from sexual abuse and sexual harassment;
- The rights of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- The dynamics of sexual abuse and sexual harassment in confinement;
- The common reactions of sexual abuse and sexual harassment victims;
- How to detect and respond to signs of threatened and actual sexual abuse;
- How to avoid inappropriate relationships with inmates;
- How to communicate effectively with inmates including, gay, bisexual, transgender, intersex, or gender nonconforming;

The training provided is geared to adult male inmates. Any employee who transfers from a female institution receives a 40-hour orientation to acclimate them to the differences in gender protocols.

All employees have trained annually on PREA and the current sexual harassment policies and procedures and are required to sign a training roster as verification of their attendance and understanding of the training. All current staff and new hire employees sign the Sexual Assault and Sexual Misconduct with Inmates Acknowledgement Form and the Malfeasance in

Office Form and both forms are maintained in the employee's personnel file. During interviews with staff, it was verified that training is conducted and attended as required.

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All security staff are trained 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.

Training also includes specialized training for medical and mental health staff, as well as for Investigators. Medical staff employed by the agency have received appropriate training to assist them in arranging for the conduct of forensic examinations but they do not perform them. The agency documents that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere.

Medical and mental health care practitioners also receive the training mandated for employees under §115.31 or for contractors and volunteers under §115.32, depending upon the practitioner's status at the agency.

All training on sexual abuse pursuant to the PREA Standards is developed by the DPS&C's Training Director in conjunction with the Chief of Operations, Regional Wardens, the Department PREA Coordinator, and the Department's Medical/Mental Health Director. All staff having contact with inmates complete training prior to job assignment concerning the facility's PREA program. Encompassed in the training is the facility policy regarding PREA, responder duties, inmates right to be free from sexual abuse, dynamics of sexual abuse and harassment, common reactions, how to detect and respond, how to avoid personal relationships, effective communication with LGBTI inmates, and mandatory reporting requirements. As required by policy and documented in training files, staff receive training at a 3-week Academy and it includes the following:

- • Zero-tolerance policy for sexual abuse and sexual harassment;
- • How to fulfill their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
- • The rights of inmates and employees to be free from sexual abuse and sexual harassment;
- • The rights of inmates to be free from sexual abuse and sexual harassment;
- • The rights of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- • The dynamics of sexual abuse and sexual harassment in confinement;
- • The common reactions of sexual abuse and sexual harassment victims;
- • How to detect and respond to signs of threatened and actual sexual abuse;
- • How to avoid inappropriate relationships with inmates;
- • How to communicate effectively with inmates including, gay, bisexual, transgender, intersex, or gender nonconforming;

Initial correctional training is just now increasing from 3 weeks to 6 weeks for correctional line staff; non-security personnel continues to receive 1 week of training initially. The training provided is geared to adult male inmates. Any employee transfers from a female institution receive a 40-hour orientation to acclimate them to the differences in gender protocols.

All employees have trained annually on PREA and the current sexual harassment policies and procedures and are required to sign a training roster as verification of their attendance and understanding of the training. All current staff and new hire employees sign the Sexual Assault and Sexual Misconduct with Inmates Acknowledgement Form and the Malfesance in Office Form and both forms are maintained in the employee's personnel file. During the interview with staff, it was verified that training is conducted and attended as required.

The Department provides Correctional Officers with refresher training annually, and all other employees refresher training every two years, to ensure that all employees are aware of current sexual abuse and sexual harassment policies and procedures.

All security staff is trained 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.

Training also includes specialized training for medical and mental health staff, as well as for Investigators. Some Medical staff employed by the agency have received training to assist them in arranging for the conduct of forensic examinations but they do not perform them at the facility. The agency documents that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere.



<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>All 10 contractors and 26 volunteers who have inmate contact have been trained in the required PREA procedures and policies. The volunteer program has been severely impacted by COVID and numbers are significantly reduced from the over 900 volunteers in previous years. All volunteers and contractors sign for training received and forms acknowledging their awareness of and responsibility for adherence to PREA requirements.</p> <p>All volunteers, interns and contractors must sign the Sexual Assault and Sexual Misconduct with Inmates Volunteer Acknowledgement Form stating that they understand that any violation shall result in disbarment from the prison and may include the filing of criminal charges as warranted.</p> <p>Interviews with the Chaplain, random staff, and the PCM indicated that contractors and volunteers are informed prior to the awarding of the contract and prior to their approval of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment. Contractors and volunteers are required to sign the Sexual Assault Sexual Misconduct with Inmates form (kept in their personnel files). Violations of this policy serve as grounds for revoking the contract and terminating the volunteer(s) access. Contractors and volunteers are also responsible for reporting incidents of sexual abuse and sexual harassment.</p> <p>The facility maintains documentation confirming the training the volunteers, interns, and contractors received. Forms for volunteers are maintained by the Volunteer Services Coordinator (Chaplain), and by the Business Office for contractors. The level and type of training provided to volunteers, interns and contractors is based on the services provided and level of contact they have with inmates, but all who have contact with inmates are notified of the zero-tolerance policy regarding sexual abuse and sexual harassment and informed of the procedures to follow to report such incidents.</p> <p>Training consists of a PREA video, review of the PREA handout, an in-person session, and a review of the Orientation Manual for Volunteers which includes a review of DOC rules and definitions related to PREA as well as relationships between volunteers and offenders.</p> <p>All training is required to be repeated annually.</p>

<b>115.33</b>	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

At intake, inmates receive information on the zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.

The day after intake, (excluding holidays), inmates are scheduled for orientation where they receive required information on their right to be free from sexual abuse and sexual harassment; to be free from retaliation for reporting incidents, and procedures for responding to incidents.

Within 30 days, additional comprehensive education is provided. Each time an offender transfers, this information is repeated at the new institution, and the offender signs a new Intake Sheet and this was verified in numerous offender interviews as well as offender file reviews. Each offender orientation includes verbal and written training information regarding sexual assault and sexual misconduct, including:

- • Prevention;
- • Self-protection;
- • Multiple channels of reporting sexual assault and sexual misconduct;
- • Protection from retaliation;
- • Treatment and counseling;
- • DPS&C zero tolerance for sexual assault and sexual misconduct.

The facility utilizes different formats, including live staff instruction, utilization of prerecorded video review, written documentation in the form of a flier or pamphlet, and follow-up review provided by staff to ensure inmates understand the information that is being presented, including;

- Inmates who are limited English proficient;
- Inmates who are deaf;
- Inmates with visual impairment; and
- Those inmates who show signs of other disabilities including those with limited reading skills.

Inmates received at Dixon are there for longer terms so short turnovers are relatively rare. Of the 493 inmates received in the past year, 341 received comprehensive education since their stays were all 30 days or longer. The policy requires that inmates at all institutions receive information concerning sexual abuse during offender orientation at their respective permanent housing unit upon intake. In addition, each offender receives one hour of annual training regarding sexual abuse and reporting.

Certified offender interpreters may be used to explain the policies and procedures for reporting; however, the Department will not rely on offender interpreters, offender readers, or other types of offender assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the offender's safety, the performance of firstresponse duties or the investigation of the offender's allegations. There were zero uses of interpreters in the past year. All staff interviewed who worked with intake verified that information is given orally to anyone with reading issues.

The Department utilizes the Ligualex Telephone Interpreting Services for all foreign language interpreting needs.

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

Investigators receive training in conducting sexual abuse and sexual harassment investigations in a confinement facility and all investigators have completed the required training. Training certificates are on file at the facility in personnel records.

Investigator and Assistant Warden interviews confirmed that this training includes:

- Techniques for interviewing sexual abuse victims;
- Proper use of Miranda and Garrity warnings; Sexual
- abuse collection; and
- Criteria and evidence required to substantiate a case for administrative action or prosecution referral.
- Training includes that offered by DPS&C and training offered by the National Institute of Corrections. Documentation of this training is retained in the Training Department for training credit and documentation.

115.35	<b>Specialized training: Medical and mental health care</b>
	<p data-bbox="240 230 695 255"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="240 315 421 340"><b>Auditor Discussion</b></p> <p data-bbox="240 436 1339 461">The 23 medical/mental health staff were all (100%) trained in current agency and PREA policy, including the following:</p> <ul data-bbox="293 510 1286 645" style="list-style-type: none"> <li>• To detect and assess signs of abuse;</li> <li>• To preserve physical evidence of sexual abuse;</li> <li>• To respond effectively and professionally to victims of sexual abuse and sexual harassment; How to</li> <li>• report allegations or suspicions of sexual abuse and sexual harassment.</li> </ul> <p data-bbox="240 674 1474 801">In addition to the specialized training requirements and the requirement to complete NIC training related to this area, medical and mental health staff receive the training required for all staff, as do contract medical and mental health personnel. During orientation and annually thereafter, all staff receive training in the prevention, detection, response, reporting, and investigation of sexual abuse. They felt that inmates here are safe and receive few indications of inmates fearful or concerned about sexual safety.</p> <p data-bbox="240 833 1474 889">The agency maintains documentation that medical and mental health practitioners have received the required training referenced in this standard either from the agency or elsewhere. Professional certifications are maintained individually on personal time.</p>

<b>115.41</b>	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination: Meets Standard</b>
	<b>Auditor Discussion</b>

At intake here, all inmates are screened to assess their risk for being sexually abused or abusive toward other inmates. The screening is normally conducted the day of arrival but no later than 72 hours after arrival at the facility and utilizes DPS&C PREA intake forms and processes. The screening tool is utilized in conjunction with information received directly from the inmate concerning their feelings of safety and security to ensure that they are housed appropriately and receive appropriate follow-up by mental health as necessary. Interviews with the medical and mental health staff and the PREA Compliance Manager indicate a consensus that screening has improved as the staff has become more experienced and attuned to the process.

DPS&C's PREA Screening Checklist includes the following:

- Whether the offender has a mental, physical or developmental disability;
- The age of the offender;
- The physical build of the offender;
- Previous incarcerations;
- Exclusively nonviolent criminal history;
- Whether the offender has prior convictions for sex offenses against an adult or child;
- Whether the offender is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
- Has the offender previously experienced sexual victimization;
- The offender's perception of vulnerability;
- Whether the offender is detained solely for civil immigration purposes.

In addition, the screening also includes:

- Prior acts of sexual abuse;
- Prior convictions for violent offenses;
- When known, to the facility: history of prior institutional violence or sexual abuse.

The mental health supervisor interviewed indicated that, at the 14-day mark, each sex offender is reassessed by mental health for risk of victimization or abusiveness, and all others are completed by the 3rd week, possibly earlier based upon any additional, relevant information received by the facility since the intake screening.

An offender(s) risk is always reassessed when warranted due to referral, request, incident of sexual abuse or receipt of additional information that bears on the offender's risk of sexual victimization or abusiveness.

No offender is disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked on the PREA Screening Checklist. Offender(s) are informed that any information given in response to questions asked are of a confidential nature and will not be disseminated in any way that will be exploited to the offender's detriment.

All 493 inmates received here longer than 72 hours received the required reassessment within less than 30 days, the standard for the Mental Health staff being about 21 days, 14 days for sex-crime inmates. There were 341 inmates received who were here for longer than 30 days and all were reassessed within the required 30 days.

DCI uses the LADPS&C PREA Screening Checklist, an assessment tool utilized to assess an offender's probability of being a PREA Blue High-Risk Sexual Victim (HRSV), a PREA Red High-Risk Sexual Predator (HRSP), or if neither, classified as PREA Green.

- PREA Blue HRSV: Based on the Checklist, any offender within the custody of the DPS&C who has been identified as an individual who has been confirmed as a sexual victim or appears to be at high risk for sexual predation.
- PREA Red HRSP: Based on the Checklist, any offender within the custody of the DPS&C who has been identified or confirmed as an individual with the propensity to sexually assault others.
- PREA Green: Based on the Checklist, any offender within the custody of the DPS&C with no significant risk of sexual victimization or sexually predatory behavior.

Decisions concerning housing assignments, jobs, and group activities for PREA Blue HRSV and PREA Red HRSP inmates are the responsibility of the Initial Classification Board at each receiving institution and based on the Checklist, record review, prior facility behavior, and current behavior. If mental health intervention is indicated, a referral is made by the Board to a mental health professional.

In deciding where to assign a transgender or intersex offender and in making other housing and programming assignments, the prison considers on a case-by-case basis whether a placement would ensure the offender's health and safety and whether the placement would present management or security problems. Transgender inmates will also be given the opportunity to shower separately and each unit maintains documentation of the efforts to offer separate showers utilizing a Shower Preference Statement. Questions regarding the identification of a transgender or intersex offender's genital status are referred to DPS&C's Medical/Mental Health Director for review and, if needed, determine if a physical examination in a private setting by a health care provider is necessary.

Reception center staff note the results of the Checklist in the Offender Management System. Consideration concerning housing, including possible single-cell placement, is determined by the Classification Board based on initial screening information for those inmates confirmed/deemed PREA Blue HRSV and/or PREA Red HRSP.

MH (Mental Health) Screening is conducted on all transfers, at the time of admission to DCI, by mental health trained or qualified MH care personnel. MH Appraisals are conducted within 14 days of admission to a DOC reception center. Inmates designated by the reception center appraisal process, or who exhibit mental health symptoms upon arrival at a new institution receive, in addition to the required mental health screening, a comprehensive evaluation by a Licensed MH professional. Information received during the screening is maintained by staff to ensure there are no concerns with privacy.

<b>115.42</b>	<b>Use of screening information</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Once an offender is determined as a PREA Blue HRSV and/or PREA Red HRSP at any time during incarceration, the offender is evaluated by the Classification Board for appropriate housing and programs and referred to a mental health professional. The mental health professional meets with the offender upon receipt of the referral to offer services and encourage programming.</p> <p>The screening information is used as follows to keep separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive:</p> <ul style="list-style-type: none"> <li>• · Housing assignments and Unit assignment;</li> <li>• · Bed assignments;</li> <li>• · Work assignments;</li> <li>• · Education assignments; and ·</li> <li>• Program assignments.</li> </ul> <p>In order to achieve effective management of these PREA-related inmates, each time a PREA Blue HRSV and PREA Red HRSP offender's housing location is changed, his PREA designation will be provided by Classification to the receiving housing unit senior officer. This information is also included in the inmate file so that senior staff can prevent inappropriate housing or work assignments.</p> <p>Individualized determinations are made to ensure the safety of each offender by the Reception and Diagnostic Centers, which determine placement in a DPS&amp;C facility. Once at DCI, the facility does not place lesbian, gay, bisexual inmates on a tier solely on the basis of such identification or status and auditors found them located across the entire housing spectrum.</p> <p>Placement and programming assignments for transgender and intersex inmates are reassessed twice each year to review threats to safety that may have been experienced by the offender. DPS&amp;C C-01-022 Form O (Transgender/Intersex Reassessment is utilized) The views of the offender with respect to their own safety are always solicited and given consideration according to interviews with classification staff and the PCM.</p> <p>Transgender inmates are given an opportunity to shower separately from other inmates by completing a Shower Preference Statement.</p> <p>Mental health staff interviewed indicated that services for PREA Blue HRSV inmates focus on issues related to treatment for and prevention of victimization. DPS&amp;C's Medical/Mental Health Director is tasked to ensure that the institution employs or has access to the services of a licensed mental health professional who has a scope of practice, training, and/or experience in trauma counseling.</p> <p>Mental health services for PREA Red HRSP inmates focus on alleviating the offender's propensity for predatory or aggressive sexual behavior and sex offender treatment is often offered to these inmates if it would be appropriate.</p> <p>Classification staff interviewed indicated that the Director of Classification is notified at intake by the Initial Board or by any staff member thereafter who identifies an offender as a PREA Blue HRSV and/or PREA Red HRSP. The Director of Classification ensures that this information is entered into the offender's Annual Assessment, Master Record and in the mental health section of the offender's medical record for monitoring purposes. Each facility reviews the offender's PREA designation prior to any housing, job, or program reassignment in order to make an individualized safety determination.</p>

<b>115.43</b>	<b>Protective Custody</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>



The facility interviews and the facility information in the OAS indicated no offenders were held in involuntary segregation for longer than 30 days this past year but there were 2 who were placed there, reportedly for shorter periods of time, during investigations.

Generally, the offender victim is held in restricted housing only until his safety can be verified or assured. DPS&C has a management form "24-hour Review of Involuntary Segregation Status During PREA-Related Investigation" that they utilize to document the offender's stay in restricted housing. There was an initial question to the administration regarding whether offender victims are routinely maintained in investigative segregation and the facility provided copies of review documents returning victims back to their original unit after initial review.

An offender placed in segregation because of a high risk of sexual victimization is required by IS-B-4 policy to have access to programs, privileges, education and work opportunities commensurate to inmates in general population but this may not occur in very short-term separations. Documentation is required by DPS&C to be maintained indicating which opportunities were limited, the duration of the limitations and the reasons for the limitations.

If the facility cannot conduct an assessment immediately, they may hold the offender in involuntary segregated housing for less than 24 hours while completing the assessment. Placement in involuntary segregation and disciplinary segregation is to be reviewed after the first 24 hours, seven days and each 30 days thereafter.

The facility reports that only 2 inmates were placed in involuntary segregation in the past 12 months and they also report that, in those 2 cases where involuntary segregation was used, required documentation was completed to explain the segregation. The two inmates held in involuntary protective custody were pending investigation.

Regarding what privileges and programs offenders have in involuntary segregation, several offender interviewed who identified as sexual abuse victims said their programs and privileges stopped but that's likely because they were confined as part of an investigation, not the DOC Involuntary Segregation policy and model. Victims' programs aren't supposed to end according to DOC IS-B-4 policy and the facility reports it is in compliance, excepting only that some programs have been paused system-wide due to COVID, reduction of volunteer numbers, etc. Forms from board actions were provided showing expedited return of victims to their general population housing unit.

<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Inmates at DCI may report sexual abuse and sexual harassment, retaliation by other offenders or staff, and/or report staff neglect that may have contributed to an incident through the Administrative Remedy Procedure (ARP), via letter through institutional mail, regular mail, filing a grievance, by calling Crime Stoppers or by contacting the respective Consulate. Crime Stoppers Baton Rouge is the reporting agency for Dixon telephone reports. Inmates can also submit internal mail to management, signed or unsigned.</p> <p>Inmates may verbally, in writing, or anonymously report sexual abuse and sexual harassment. During offender interviews, it was evident that information in regard to reporting opportunities for inmates is well disseminated in multiple forms. Inmates could verbalize understanding of multiple methods of reporting to include third-party reporting and anonymous reporting. The majority of inmates stated that they would be comfortable with reporting directly to staff in the event that a need arose. All inmates noted the available posting with listed phone numbers for reporting.</p> <p>Staff who are notified by an offender of sexual abuse and/or sexual harassment will follow directions provided on the back of their identification cards, which include first responder steps as well as completing an Unusual Occurrence Report detailing the incident. Staff in random interviews were aware in every case that they are required to report sexual need to remain anonymous and would simply use their chain of command.</p>

<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<p data-bbox="244 230 695 253"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="244 315 422 338"><b>Auditor Discussion</b></p> <p data-bbox="244 416 1474 510">In the past 12 months, 6 grievances were filed that alleged sexual abuse, all resolved and responded to within the 90-day limit. The number of emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months was also 6, all of which were reportedly responded to within 48 hours and a final response issued within 5 days.</p> <p data-bbox="244 544 1490 667">Inmates are first encouraged to speak with staff if they have an issue of concern or need. However, if for some reason communicating with a staff member is not helpful, they are asked to put their concerns in writing and submit the letter to the appropriate staff. Lastly, if these mechanisms do not answer their question or address their grievance, they may submit the issue through the Administrative Remedy Procedure (ARP).</p> <p data-bbox="244 701 1490 824">Inmates may use the Administrative Remedy Procedure (ARP), grievance, or any informal method to report sexual abuse and/or sexual harassment. The offender's report does not have to be submitted to the staff member who might be the subject of the complaint. Grievances may also be placed in institution mail. The investigation of the accusation(s) is not referred to the staff member referred in the grievance.</p> <p data-bbox="244 857 1442 952">A decision on the grievance relating to sexual abuse and/or sexual harassment is required to be made within 90 days of the initial filing of the grievance. The offender is notified in writing of any extension in time that is needed to respond and the approximate date. If a response is not received at any level of the grievance process an offender can consider this as a denial at this level.</p> <p data-bbox="244 985 1442 1041">Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates are permitted to assist inmates in filing requests for administrative remedy as it pertains</p> <p data-bbox="244 1075 1474 1169">to sexual abuse or sexual harassment. Third-party reporting filed on behalf of the offender requires the offender to agree to proceed as a condition of processing the request. If the offender declines to have the request processed the offender will complete the ARP Drop Form.</p> <p data-bbox="244 1202 1474 1397">DCI has in place a procedure for filing emergency grievances alleging an offender is subject to a substantial risk of imminent sexual abuse. These grievances are given to the Unit Manager, who speaks with the offender to determine the nature and severity of the threat. The Unit Manager provides the offender with a response within 48 hours and the facility a response in 5 calendar days, excluding weekends and holidays. The decision on the grievance determines whether the offender is in a substantial risk of imminent sexual abuse. There were 6 grievances filed in the past year, 6 filed as emergency grievances and all 6 were responded to within 24 hours and received a final response within the required 5 days.</p> <p data-bbox="244 1431 1490 1487">The facility documents the actions taken in response to the emergency grievance and the final decision of actions taken. If determined that an offender filed the grievance with malice, the offender can be disciplined.</p> <p data-bbox="244 1520 1490 1576">The Department does not require an offender to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.</p>

<b>115.53</b>	<b>Inmate access to outside confidential support services</b>
	<p data-bbox="244 1765 695 1787"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="244 1850 422 1872"><b>Auditor Discussion</b></p>

Inmates may request at the time of the allegation to have access, including phone numbers, to receive outside assistance from victim advocates for emotional support. Advocates are routinely available to accompany offenders during hospital forensic procedures. Those inmates detained for civil immigration receive mailing addresses, telephone numbers, and tollfree numbers to national immigration services agencies.

Inmates are placed on notice that all telephone calls are monitored with the exception of properly placed privileged calls between an offender and his attorney. Reports of abuse are always forwarded to Investigations.

DCI, as part of the DOC, has an agreement with LaFASA (Louisiana Foundation Against Sexual Assault) that is able to provide crisis counseling and assistance avenues. LAFASA address posters are located throughout the facility in offender traffic areas. The Assistant Warden/PCM interview reflected that mail to LAFASA is treated as privileged and is confidential.

During interviews, it was evident that both staff and inmates were aware of the availability of telephone numbers for contacting and outside resources.

115.54	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Third parties (which may include other inmates, unit staff, family members, attorneys, and outside advocates) may also assist offenders by making sexual abuse harassment reports, and/or initiating formal grievances. However, once this formal grievance process has been initiated by a third party, the offender must authorize the request for remedy and must continue the process in accordance with Department Regulation No. B-05-005 "Administrative Remedy Procedure." The prison documents inmates who decline to continue with the grievance once a third party initiates the process.</p> <p>DCI has methods in place to receive third-party reports of sexual abuse and sexual harassment, primarily through the PCM. Individuals may call Crime Stoppers, file a grievance, the PREA Hotline, use institutional, or use regular mail. Posters and the PREA handbook provide information to access third-party reporting both on the website and in the visiting room and in offender manuals. Crime Stoppers then contacts the facility Warden or Deputy Warden. Offenders interviewed reported they were aware of the ability to report through a third party, such as a family or friend outside the facility if necessary.</p>

<b>115.61</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Staff is required to report immediately any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment, retaliation, or staff neglect or violation of responsibilities that may have contributed to an incident of sexual harassment or retaliation that occurred in the facility.</p> <p>Apart from reporting to their designated supervisor, staff has been directed to refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in this policy, to make treatment, investigation, and other security and management decisions.</p> <p>Medical and mental health practitioners are required to report sexual abuse as referenced above and the offender is informed of this requirement at the initiation of services and the limitations of confidentiality. LA statute requires that the facility report, on behalf of youth or on behalf of adults who are considered vulnerable, any allegations to the designated State or local service agency under mandatory reporting laws.</p> <p>All allegations of sexual abuse and sexual harassment are reported to Investigations, including third-party and anonymous reports. All allegations of sexual assault, sexual misconduct, or sexual harassment by either staff or offender may be reported to any staff member. The staff member who receives such reports, whether verbally or in writing, immediately notify the supervisor who ensures that an Unusual Occurrence Report (UOR) is completed. All PREA related UOR's go immediately up the chain of command.</p> <p>Any allegation of sexual abuse is reported to DPS&amp;C's PREA Coordinator and PREA Investigator immediately following the initial notification to the Warden. The assigned investigator immediately notifies the Victim Advocate (but no later than the next business day), that alleged sexual abuse has occurred. During interviews, staff expressed the importance and the requirement to report any knowledge of a PREA related incident or concern immediately to their supervisor. Staff noted that they would feel comfortable reporting any information regardless of the topic or individuals involved.</p>

<b>115.62</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Immediate steps are taken when the facility learns that an offender might be subject to a substantial risk of imminent sexual abuse. PREA time limits of 48 hours for initial response and 5 days for resolution are observed in this process and, in actuality, the initial response is virtually immediate. A</p> <p>When staff learns that an offender is subject to a substantial risk of imminent sexual abuse, they are trained to take immediate action to protect the alleged victim and to assume all reports of sexual victimization, regardless of the source of the report (third party, anonymous, verbal, etc.) are credible and respond accordingly. During interaction with staff, it was evident that staff have received training concerning the actions to be taken immediately upon receiving information concerning a PREA related incident or determining that an inmate is at risk.</p>

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<p data-bbox="244 230 695 255"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="244 315 422 340"><b>Auditor Discussion</b></p> <p data-bbox="244 400 1477 526">The facility has received no allegations of sexual abuse from other facilities in the past 12 months. No allegations were received from other confinement facilities that an offender was sexually abused while confined at DCI, but local policy is that such a notification would-be reported directly to the Warden and the Warden ensures that allegations are thoroughly investigated in the same manner as are all allegations.</p> <p data-bbox="244 562 1490 719">Upon receiving an allegation from an offender that he was sexually abused while confined at another facility, the Warden stated in his interview that he would notify their executive in writing. An email would usually be sent from the DCI warden to the other warden, or from investigator to investigator of the facility where the alleged abuse occurred. Notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and documentation is placed in the offender's Master Record. Documentation of the notification is also logged in the "case" logbook.</p> <p data-bbox="244 754 1453 846">Immediate steps are taken when it appears that an offender might be subject to a substantial risk of imminent sexual abuse. PREA time limits of 48 hours for initial response and 5 days for resolution are observed in the process and local policy repeats this as a requirement to be observed if it happens.</p>

<b>115.64</b>	<b>Staff first responder duties</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>There were 30 allegations in the past year that an inmate was sexually abused and the responding staff member had to separate the alleged victim and abuser in only one case. There was 1 case that was reported in enough time for collecting physical evidence and the required first responder steps were followed in that case. No non-security staff was the first responder in any of the cases.</p> <p>All staff interviewed, including non-uniformed staff, were well familiar with proper steps and procedures for initial responses to an incident, and all had their PREA card with the required steps in their possession.</p> <p>The first staff member receiving the report/allegation and/or the appropriate supervisor advised the one victim not to shower or otherwise hygienically clean; or, if the assault was oral, not to eat, drink, or brush their teeth or otherwise take any action that could damage or destroy physical evidence pending completion of the gathering of that evidence and/or the initial investigation.</p> <p>First responders secure the alleged crime scene if feasible and if forensic evidence may exist. The only persons allowed to enter a secured crime scene are the assigned investigator(s), medical staff, and/or the Warden, as needed. The crime scene remains secured until released by the investigator.</p> <p>Investigators 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.</p> <p>Louisiana law requires all biological evidence collected in cases involving homicide and rape to be held in secure custody indefinitely or turned over to the local Sheriff's Office if they are handling the criminal investigation.</p> <p>The alleged victim will be promptly escorted under appropriate security to the infirmary for assessment. If transporting the alleged victim to the infirmary or a hospital emergency room, the victim is instructed to undress over a clean sheet in order to collect any potential forensic evidence that may fall from his person. The sheet, along with the victim's clothing, is collected as evidence and placed in a paper bag with an appropriate chain of evidence form attached.</p> <p>When released from the infirmary or emergency room, the alleged victim is to be segregated from the alleged aggressor and screened by a mental health professional with appropriate referrals made.</p> <p>The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and not be determined by the person's status as an offender or staff.</p> <p>Alleged aggressors who are offenders are held in segregation pending investigation and remain there until the investigation is complete unless other circumstances require the transfer of the alleged offender aggressor. The offender accused of predatory behavior is always evaluated by mental health staff prior to the disciplinary hearing of the violation.</p> <p>DCI conducts mental health evaluations of abusers within 60 days of learning of such abuse and after treatment when deemed appropriate by mental health practitioners, and documents this utilizing the Mental Health Evaluation for Substantiated Cases of Sexual Assault Form.</p> <p>In any case where the alleged aggressor is a staff member, there is no contact between the alleged aggressor and the alleged offender/victim without the approval of the Warden.</p> <p>Interviews with the DPS&amp;C PREA Coordinator and a contracts staff report that DCI and LA DPS&amp;C have no contracts or agreements that would limit DCI's ability to remove the alleged staff sexual abuser from contact with any offender pending the outcome of the investigation or of a determination of whether and to what extent any staff discipline is warranted.</p>

<b>115.65</b>	<b>Coordinated response</b>
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	<b>Auditor Overall Determination: Meets Standard</b>
	<b>Auditor Discussion</b>



Each supervisor and senior staff member interviewed was aware of the steps required by the various parties following any incident and, as would be expected, most line staff were aware of just their own requirements and some of the requirements of their supervisors.

Actions Required After Report of Sexual Abuse:

- When staff learns that an offender is subject to a substantial risk of imminent sexual abuse, take immediate action to protect the alleged victim. Staff report and respond to all allegations of sexually abusive behavior and sexual harassment. Assume all reports of sexual victimization, regardless of the source of the report (third party, anonymous, verbal, etc.) are credible and respond accordingly. Only specified employees should be informed of the incident, as it is important to respect the victim's security, identity, and privacy.
- All allegations of sexual abuse are to be handled in a confidential manner throughout the investigation.
- All conversations and contact with the victim should be sensitive, supportive, and non-judgmental.

Initial Response: Upon the report or discovery of an incident of sexual abuse/sexual assault, the first security staff member to respond shall:

- Intervene in any assaults and separate the alleged victim and abuser.
- Detain the abuser.
- Call for emergency medical care for the victim, if necessary.
- Immediately notify your supervisor and remain on the scene until relieved by responding personnel.
- Preserve and protect the crime scene until appropriate steps can be taken to collect any evidence.
- Request that the alleged victim not take any actions that could destroy physical evidence, including bathing, brushing teeth, changing clothes, defecating, smoking, drinking, or eating.
- Ensure that the alleged victim does not take any actions that could destroy physical evidence, including bathing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.
- If the first responder is not a correctional officer the responder is still required to request that the alleged victim not take any actions that could destroy physical evidence; remain with the alleged victim and notify security staff.
- Apart from responding to designated supervisors, employees are not to reveal any information related to the incident to anyone other than to the staff involved with investigating the alleged incident.
- Document detailed description of:
  - Victim and abuser locations and affect (emotions, appearance, etc.)
  - Wounds and where they are
  - Anything the victim or abuser reported to you

Shift Supervisor will follow the below procedures:

- Notify immediately the warden or designee, the PREA Compliance Manager, and the Investigator. The Investigator assumes control.
- Assign an officer to remain at the crime scene to protect the area.
- Attend to the victim. Ensure the alleged victim is assessed by medical staff and housed in the Infirmary Isolation cells.

Do not speak loudly or call unnecessary attention to the victim.

- A security staff member is placed outside the cell or area for direct observation to ensure these actions are not performed. The alleged victim must not be left alone until evaluated by Mental Health Staff for suicide risk.
- The alleged abuser remains in the dry cell/area under direct supervision of a same sex correctional officer to ensure he does not destroy potential evidence.
- After the investigator has completed the interview, separate and apart from the alleged victim, the alleged abuser is referred to medical for further assessment and treatment as deemed necessary by healthcare providers. Visible injuries are documented both photographically and in writing and placed in the abuser's medical record.
- Thereafter, the alleged abuser is held in segregation pending further investigation.
- A brief inquiry will be made to each individual separately and apart from each other to determine if the sexual contact was consensual or non-consensual. Note: Designated staff interpreters will be used when communicating with victims with limited English proficiency, unless exigent circumstances exist which will be fully documented.
- Ensure all persons who played an active role in the response document their actions, providing as much detail as possible, and ensure that they remain on duty until properly debriefed and relieved as appropriate.
- Ensure referrals to EAP for staff in need of crisis intervention counseling.
- Incidents are fully documented.

- o Log Book o
- Security Video o
- Photos

#### Facility Crime Scene

- Start a crime scene log. Everyone who enters the crime scene area must sign the log. Document each person entering the crime scene, the time of entry, and the time of departure. Note: Only persons allowed to enter the crime scene are assigned investigators, medical staff, and the Warden or designee.
- Video and photograph the crime scene area before removal of any items from the area.
- Identify staff that will touch and/or handle evidence.

Notifications Required when Sexual Abuse is Alleged: Ensure the below notifications are made within two hours of the occurrence:

- Warden
- PREA Compliance Manager
- Investigator
- Health Care Authority
- Mental Health

For allegations of sexually abusive behavior in which an employee is the alleged abuser, only the Warden and investigator are notified of the specifics of the allegation. They make notifications and referrals to outside law enforcement agencies and licensing boards as appropriate.

Note: In every case where the alleged abuser is an employee, contractor, or volunteer there is to be no contact between the alleged abuser and the alleged victim pending the outcome of an investigation.

#### Evidence Protocol

If the abuse occurred within 72 hours, procedures will be followed in accordance with DCI policy 02-01-007- "Crimes Committed on Grounds of DCI".

#### Responsibility when Sexual Harassment is Alleged

Some offender allegations rise only to the level of sexual harassment. For allegations of sexual harassment, responding supervisory staff:

- Ensure that the alleged victim and abuser are separated.
- A brief inquiry will be made to each individual separate and apart from each other to ascertain if the sexual behavior was consensual or nonconsensual.
- Ensure that your supervisor and the investigator are notified.
- Incidents of this sort are fully documented.
- The incidents are investigated and the alleged abuser may be segregated pending the outcome of the investigation.
- The alleged victim is referred to Mental Health for re-assessment to determine if any issues need to be addressed. · If the allegation is substantiated, the abuser is referred for administrative disciplinary sanctions and re-assessed to determine if any issues need to be addressed.

#### Responsibility When Sexual Activity is Alleged

Not all reports or allegations require a full response protocol. For reports or allegations of sexual activity where the involved inmates independently report a non-coercive consensual sexual encounter, responding supervisory staff:

- Ensure that the involved individuals are separated.
- A brief inquiry will be made to each individual independently to ascertain if the sexual encounter was consensual or nonconsensual
- Notify your supervisor and the Investigator.
- If the Investigator determines the behavior is in fact sexual activity, the involved inmates are referred for administrative disciplinary sanctions. The disciplinary board refers the offender to mental health for an assessment as to whether an offender's mental disabilities or mental illness contributed to his behavior when determining what type of sanction, if any, should be imposed.
- The involved individuals are always re-assessed to determine if any issues need to be addressed.

In other cases, there may be insufficient reason to proceed (the alleged victim credibly recanted, or the alleged abuser was not in the facility on the date of the allegation, etc.) and the response protocol may be terminated. These incidents are still reported.

<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Interviews with the DPS&C PREA Coordinator and a DCI Contracts staff report that DCI and LA DPS&C have no contracts or agreements that would limit DCI's ability to remove the alleged staff sexual abuser from contact with any offender pending the outcome of the investigation or of a determination of whether and to what extent any staff discipline is warranted.

<b>115.67</b>	<b>Agency protection against retaliation</b>
	<p data-bbox="244 230 695 253"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="244 320 421 342"><b>Auditor Discussion</b></p> <p data-bbox="244 461 1493 689">Retaliation is prohibited in DPS&amp;C. If detected or alleged, the appropriate supervisor is directed to immediately contact the facility investigative section. Staff is trained to also report any claims of retaliation against inmates and other staff for reporting abuse, as well as any staff neglect or violation of responsibility that may have contributed to an incident or retaliation. The Assistant Warden for Administration is responsible for collaborating with the Investigator to monitor retaliation. Interview of the Assistant Warden indicates a system of informal checks and maintaining sensitivity to housing changes, disciplinary reports, job changes, etc. He indicated he maintains contact even in cases determined to be unfounded. Further, his interview and the PCM interview both indicated that the 90 days was a guideline and had been exceeded on occasion when it appeared advisable.</p> <p data-bbox="244 734 1469 857">There are multiple protection measures in place for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with an investigation. To the maximum extent possible, staff referenced in an offender’s grievance or ARP are moved until the conclusion of the investigation. Mental health services are always available to inmates by writing to mental health.</p> <p data-bbox="244 869 1453 925">Except in instances where DCI determines that a report of sexual abuse is unfounded, the facility does the following for at least 90 days following a report of sexual abuse:</p> <ul data-bbox="244 936 1469 1261" style="list-style-type: none"> <li>· Monitor the conduct and treatment of offenders or staff who report sexual abuse to see if there are changes that may suggest possible retaliation by other inmates or staff;</li> <li>· Monitor the conduct and treatment of inmates who suffered sexual abuse to see if there are changes that may suggest possible retaliation by other inmates or staff;</li> <li>· Act promptly to remedy any retaliation;</li> <li>· Monitor offender disciplinary reports;</li> <li>· Monitor offender housing changes;</li> <li>· Monitor offender program changes;</li> <li>· Monitor negative performance review of staff;</li> <li>· Monitor reassignments of staff;</li> <li>· Continue monitoring beyond 90 days if the initial monitoring indicates a continuing need.</li> </ul> <p data-bbox="244 1305 1477 1541">Inmates receive a periodic status check for at least 90 days following a report of sexual abuse; the DCI investigator monitors the conduct and treatment of inmates or staff who reported the sexual abuse and inmates who were reported to have suffered sexual abuse. If any changes suggest retaliation, the investigator discusses them with the PREA Compliance Manager and Deputy Warden in order to act promptly to remedy any such retaliation. Items monitored include offender disciplinary reports, housing or program changes, or negative performance reviews or reassignments of staff. Such monitoring continues beyond 90 days if the initial monitoring period indicates a continuing need. The reason is documented on the PREA Agency Protection against Retaliation for Inmates/Staff Form. If an offender who is being monitored for retaliation is transferred, the PREA Compliance Manager at the sending facility follows up with the receiving facility to ensure continuity of retaliation monitoring.</p>

<b>115.68</b>	<b>Post-allegation protective custody</b>
	<p data-bbox="244 1771 695 1794"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="244 1861 421 1883"><b>Auditor Discussion</b></p> <p data-bbox="244 1951 1469 2029">This standard is compliant as noted in elements of 115.43 above. This area was reviewed in detail and documents were provided by the facility during the CA period reflecting rapid return of victim offenders to their housing units once they were determined to be victims by the investigation.</p>

<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination: Meets Standard</b>
	<b>Auditor Discussion</b>

DPS&C's head of investigations also is responsible for oversight of PREA Investigators, and is a position that oversees all investigations for the Department and works in conjunction with the Wardens and individual investigators. All investigation case reports are required to be concluded, reviewed, and forwarded to Headquarters within 30 days of receiving the initial allegation. In the event an extension of the 30-day time period is needed, a request is submitted to the Headquarters Director of Investigations. This position also tracks SAFE/SANE evaluations and enters required data into the annual State report on investigations.

Incidents involving criminal acts of sexual assault and sexual misconduct where local law enforcement is not conducting the investigation should be investigated by an investigator who is acting under the authority of DPS&C's HQ-level PREA Investigator. If an investigator is not assigned to the reporting prison, one is assigned to the facility by the Chief of Operations. In actual practice, the agency or facility refers all criminal sexual assault cases to the East Feliciana Parish Sheriff's Office.

Prompt attention is given to providing objective and thorough investigations pertaining to sexual abuse and/or sexual harassment that are conducted regardless of how they are reported. When sexual abuse is alleged, DCI uses investigators who have received special training in sexual assault and sexual misconduct investigations; crime scene management; elimination of contamination; evidence collection protocol; and crisis intervention.

Investigations include the collection of and preservation of direct and circumstantial evidence as well as interviews with the victim(s), the suspected perpetrator(s), and any witnesses. Investigators also check for prior reports or complaints that may have been filed against the suspected perpetrator. Any physical and DNA evidence is collected in accordance with DCI policy 02-01- 007 – Crimes Committed on the Grounds of DCI.

Per the investigator interview, investigators are trained to be objective and consider the facts of the allegation(s) and not weigh the individuals' status as an offender or as an employee.

Offender victims are not subjected to a polygraph examination as a condition of preceding with an investigation.

Investigations (both criminal and administrative) review all details including what staff actions or inactions may have led to the sexual abuse and/or sexual harassment and these later receive Sexual Assault Incident Reviews per DOC policy.

Investigative reports are compiled in accordance with DPS&C Form E (Standardized Case Report Format) which includes descriptions of the physical evidence and testimonial evidence as well as the reasoning behind credibility assessments and facts and findings.

Substantiated allegations of sexual abuse are referred for criminal prosecution and there were 5 within the past 12 months prior to the audit. Investigative reports of unsubstantiated or unfounded claims are maintained in accordance with the Department Records Management Program, which requires that reports from the active year plus 6 years be archived. In an investigation of recent sexual assault or sexual misconduct occurring within 72 hours, steps to be taken by the Warden or designee include the referral for forensic examination and detailed preservation and study of the scene.

The Warden reports he is always notified and an investigation initiated as directed. Based upon the initial inquiry and/or evidence that the allegation represents possible criminal activity, the Warden notifies local law enforcement and the facility investigative section. At the initiation of the investigation, the alleged victim(s) and alleged aggressor(s) are immediately separated if not already done. The Warden or PREA Compliance Manager coordinates with the assigned investigator in decisions regarding the housing and management of the alleged offender/victim(s), alleged inmates, and any alleged offender/witness(es) so as not to inadvertently interfere with the criminal investigation.

Investigations of sexual abuse occurring more than 72 hours after the incident is relatively similar, except that a determination is made based upon the amount of time that has passed since the alleged incident as to whether the alleged offender aggressor should be placed in a dry cell to preserve forensic evidence.

Substantiated allegations are forwarded to the local District Attorney for a decision regarding prosecution, and the PREA Investigator works with the District Attorney's Office to ensure appropriate criminal prosecution of substantiated cases of sexual assault. Cases sent for criminal prosecution are maintained as long as the alleged abuser is incarcerated or the employee is still employed, plus five years. The release of the accused abuser (offender or staff) does not constitute grounds for termination of an investigation.

	<b>Auditor Overall Determination: Meets Standard</b>
	<b>Auditor Discussion</b>
	Per policy and interviews with the investigator, Warden and PCM, neither DPS&C nor DCI imposes a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

<b>115.73</b>	<b>Reporting to inmates</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>DPS&amp;C policy is that inmates shall be notified of the outcome of investigations into allegations made by the offender that he suffered sexual abuse. Following the conclusion of an investigation into an offender’s allegation that the offender suffered sexual abuse, the investigator interviewed stated that he informs the offender as to whether the allegation was determined to be substantiated, unsubstantiated or unfounded. If the prison did not conduct the investigation, it requests the relevant information from the investigative entity in order to inform the offender of the investigative findings. The PREA Coordinator and Investigators report that all 30 of the investigations of alleged sexual abuse had documented results reported back to the inmate after completion of the administrative investigations; there were no external agency investigations.</p> <p>There were no completed criminal investigations information reported back to offenders.</p> <p>Following an offender’s allegation that an employee has committed sexual abuse against him unless it has been determined that the allegation is unfounded or unless the offender has been released from custody, the offender is informed of the following:</p> <ul style="list-style-type: none"> <li>• The employee is no longer posted within the offender’s housing unit;</li> <li>• The employee is no longer employed;</li> <li>• The facility learns of the employee’s indictment on charges related to sexual abuse; The</li> <li>• facility learns of the employee’s conviction on charges related to sexual abuse.</li> </ul> <p>Following an offender’s allegation that an offender has committed sexual abuse against him, he is notified of the following:</p> <ul style="list-style-type: none"> <li>• The alleged abuser has been indicted on a charge related to sexual abuse; The</li> <li>• alleged abuser has been convicted on a charge related to sexual abuse.</li> <li>• These notifications are documented in the case report.</li> </ul> <p>The investigator indicated that all notifications use the Notification of “Outcome of PREA Allegation” form for substantiating the delivery of the outcome information and notice.</p>

<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>



All employees are subject to disciplinary sanctions up to and including termination for violating Department Regulations regarding the "Prison Rape Elimination Act" and regarding "Sexual Harassment and Unlawful Discrimination based Upon Sex". Termination is the presumptive disciplinary sanction for an employee who engages in sexual abuse.

The seriousness of the conduct is taken into account in determining the appropriate response according to the interview with the Warden. Regarding sexual harassment, "repeated" for the purpose of counseling sessions is more than three complaints. A third alleged sexual harassment complaint against a staff member requires a formal counseling session with the appropriate supervisor to discuss the complaint. Serious sexual harassment complaints, even if committed once, are still addressed by the Warden or leadership designee.

Alleged inappropriate touching of a romantic nature by staff, whether wanted or unwanted, are evaluated on a case by case basis to determine if the incident is a violation of PREA. Disciplinary sanctions are commensurate with the nature and circumstances of the acts committed, the employees' disciplinary history, and the sanctions imposed for comparable offenses.

Substantiated cases of sexual abuse and/or sexual harassment are reported to local law enforcement regardless of whether the employee is terminated or resigns to avoid termination. Those employees with licensure are reported to the appropriate licensing boards.

In the past 12 months, no staff who may have violated agency policy related to sexual abuse or harassment and have departed after termination; no staff were disciplined with less than termination for violations and none were reported to law enforcement for these violations in the past 12 months. No contractors or volunteers were reported to law enforcement or licensing authorities during this same period.

<b>115.77</b>	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Contractors and volunteers who engage in sexual abuse are prohibited from having contact with inmates and banned from the institution indefinitely. Violations of this policy by contractors and volunteers are reported to law enforcement and the respective licensing board. No contractors or volunteers were reported to law enforcement or licensing boards during this 12month period.

115.78	<b>Disciplinary sanctions for inmates</b>
	<p data-bbox="244 230 695 253"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="244 320 421 342"><b>Auditor Discussion</b></p> <p data-bbox="244 405 1437 562">No inmates were found guilty in the past 12 months pursuant to a formal disciplinary of engaging in offender-on-offender sexual abuse are written up on a rule violation as enumerated in Disciplinary Rules and Procedures for Adult Inmates. All sexual contact between inmates is prohibited and violators will be charged with the appropriate rule #21 (a-e) violation. Sanctions are commensurate with the nature and circumstances of the abuse committed and include the offender's disciplinary history and comparable offenses by other inmates.</p> <p data-bbox="244 595 1465 656">Inmates are disciplined for violations of rules for engaging in sexual conduct with an employee. Inmates and staff are informed that there is no consenting to sexual activity in the Department of Corrections between an employee and offender.</p> <p data-bbox="244 689 1477 846">Mental health staff interviewed indicated that the disciplinary process takes into consideration the mental faculties of the offender who perpetrated the act when determining the sanctions. In these cases, a referral to mental health is made and the report is deferred until the completion of the mental health evaluation. Reports of sexual abuse and/or sexual harassment made in good faith and based on a reasonable belief that the alleged conduct occurred is not false reporting or considered lying. Decisions are based on the preponderance of the evidence.</p> <p data-bbox="244 880 999 902">There were no offender-on-offender PREA findings of sexual abuse this past year.</p>

<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<p data-bbox="242 230 695 255"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="242 315 421 340"><b>Auditor Discussion</b></p> <p data-bbox="242 421 1477 680">Staff report 100% of inmates reporting prior victimization were referred to medical or mental health. No inmates reported prior victimization or were determined to have previously perpetrated sexual abuse during screening. If the PREA screening indicates that an offender has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, or that an offender perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, mental health staff interviewed state that they ensure that the offender is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening. The Classification Department completes an Availability of Mental Health Counseling Form upon intake for those inmates with a history of sexual victimization or who have previously perpetrated sexual abuse and this form is forwarded to the Mental Health Director for completion and placement into the Mental Health Section of the Medical Record.</p> <p data-bbox="242 716 1469 840">Any information related to sexual victimization or abusiveness that occurred in an institutional setting is limited to treatment staff (and others only as necessary) in order to develop treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State or local law. All staff interviewed were aware of the privacy standards for the offender's medical and or mental health information.</p> <p data-bbox="242 875 1461 929">Medical and mental health practitioners stated they obtain informed consent from inmates before reporting information regarding prior sexual victimization that did not occur in an institutional setting unless the offender is under the age of 18.</p>

115.82	<b>Access to emergency medical and mental health services</b>
	<p data-bbox="242 230 695 255"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="242 315 422 340"><b>Auditor Discussion</b></p> <p data-bbox="242 416 1474 544">The policy is that inmates receive timely, unimpeded access to emergency medical treatment and crisis intervention services in accordance with the professional judgment rendered by medical and mental health practitioners. The medical staff supervisor interviewed supports this and it also appears very evident at DCI, especially with their significant number of aging inmates and those in Dialysis.</p> <p data-bbox="242 575 1422 633">All PREA incident cards (carried by every staff member) list the preliminary steps to protect the offender victim and include the immediate notification of medical and mental health staff.</p> <p data-bbox="242 667 1474 929">Victims of sexual abuse or sexual harassment are evaluated and treated, and also receive follow-up services that include treatment plans and referrals upon discharge. DCI offers all victims of sexual abuse forensic medical examinations at an outside facility, without financial cost to the victim, when evidentiary or medically appropriate. Such examinations are performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) when possible. If SAFEs or SANEs cannot be made available, the examination is performed by other qualified medical practitioners. DCI documents efforts it has made to provide SAFEs and SANEs and these personnel are, in fact, normally available. The facility primarily utilizes Lane Regional Medical Center but can also use Our Lady of the Lake, which is somewhat larger in size. Both have access to SAFE/SANE on duty at most times and according to the PCM and medical interviews, DCI will call ahead to ensure one is at the facility.</p> <p data-bbox="242 960 1485 1088">Testing at Our Lady of the Lake or Lane Memorial for sexually transmitted diseases and other diseases as determined by the attending physician and counseling are made available to the alleged victim when appropriate. Referral to MH always occurs and after-incident support is offered. Documentation of all initial emergent care and follow-up is maintained within the medical record and appropriately maintained in regard to privacy issues.</p>

115.83	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Community-level of care is the DCI target performance level for medical and mental health services rendered to victims. Random and specialized staff interviewed all felt that this is achieved and likely surpassed when considering many other underserved areas of the state.</p> <p>Inmates who have been victimized by sexual abuse in any prison, jail, lock-up or juvenile facility are offered medical and mental health evaluations and, as appropriate, treatment. Follow-up services and treatment plans, as well as referrals for continuing care following transfer or placement in other facilities, are provided for victims. Interviews indicated care and counseling often continue for numerous months but can also continue throughout the incarceration.</p> <p>Mental health evaluations are conducted on all-known offender-on-offender abusers within 60 days of learning of the abuse. DCI frequently offers a sex offender program to such inmates.</p> <p>Victims of sexual abuse are offered tests for sexually transmitted infections as appropriate. These services are at no cost to the victim regardless of whether the victim names the abuser or cooperates with any investigation.</p>

<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>The prison conducts a Sexual Abuse Incident Review within 30 days of the conclusion of every sexual abuse investigation unless the allegation is determined to be unfounded. In the past 12 months, there were 10 criminal and/or administrative investigations of alleged sexual abuse completed at the facility, excluding only "unfounded" incidents, and all received incident reviews within 30 days of the investigation conclusion. The review team includes upper management officials, (Deputy Warden, or Assistant Wardens, and PREA Compliance Manager, etc.) with input from line supervisors, investigators, and medical or mental health practitioners. The review team prepares a Sexual Abuse Incident Review Form that follows the elements of the Standard. The completed form is maintained in the investigative file and a copy is sent to the Warden and the PREA Compliance Manager.</p> <p>The review team members interviewed all agreed that the review considers the following:</p> <ul style="list-style-type: none"> <li>• A need to change policy or practice to better prevent, detect, or respond to sexual abuse;</li> <li>• Was the abuse motivated by race, ethnicity, gender identity, lesbian, gay, bisexual, transgender, or intersex identification status or the perceived status;</li> <li>• An examination of the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;</li> <li>• Adequacy of staffing levels in the area;</li> <li>• Considers whether monitoring technology should be deployed are augmented; A</li> <li>• report of the findings is submitted to the Warden.</li> </ul> <p>Recommendations for improvement that are in the Warden's control are considered and normally implemented. Documentation is provided if a recommendation from the Incident Review team is not implemented.</p> <p>In the past 12 months, 10 administrative investigations (after excluding Unfounded case determinations) of alleged sexual abuse were completed at the facility and all were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents.</p>

<b>115.87</b>	<b>Data collection</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>

The LA DPS&C monitoring instrument is used to collect and track uniform data of sexual abuse at facilities. This incidentbased data instrument includes all the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice’s Bureau of Justice Statistics. An aggregated assessment is made of the data annually and included in a compiled report by the PREA Coordinator for placement on the DOC website, and the PREA Coordinator and PCM interviews state that this is the procedure that is followed.

DPS&C Procedures for Reporting to the United States Department of Justice:

- DPS&C’s HQ-level PREA Investigator prepares the annual Survey of Sexual Victimization (SSV Report) for State Prison Systems report, containing required statistics for DPS&C owned and operated facilities.
- A separate Incident Form is prepared for each substantiated sexual victimization allegation reported at a Department facility and is created by the PREA Investigator at the facility where the incident occurred.
- These forms are submitted by the PREA Investigator to the United States Department of Justice by September 1st of each year for the statistics accumulated the prior calendar year.
- A second report is completed by DPS&C’s PREA Investigator which includes all privately- operated prisons and transitional work programs under contract to or under cooperative endeavor agreement with the DPS&C. The Department’s PREA Investigator maintains any reports concerning a substantiated sexual victimization allegation occurring at all state privately operated prisons and all transitional work programs under contract or cooperative agreement with the DPS&C.
- The Department’s PREA Investigator submits copies of both SSV reports to the Secretary and the Chief of Operations prior to September 1st of each year. The aggregate numbers of the SSV reports’ statistics from the state facilities, privately operated prison facilities and transitional work programs are posted on DPS&C’s website by October 1st of each year.
- The Department maintains sexual abuse data collected pursuant to La. R.S. 115.87 for at least 10 years after the date of initial collection.

<b>115.88</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	The LA DPS&C monitoring instrument is used to collect and track uniform data of sexual abuse at facilities. This incidentbased data instrument includes data necessary to review facility trends and identify areas needing further review or consideration. An aggregated assessment is made of the data annually and included in a compiled report by the PREA Coordinator.



115.89	<b>Data storage, publication, and destruction</b>
	<p data-bbox="244 230 695 255"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="244 315 421 340"><b>Auditor Discussion</b></p> <p data-bbox="244 400 1474 495">Reviews of all data collected are used to assess and improve the effectiveness of sexual abuse prevention, detection, and response policies, practices, and training, including identifying problem areas in DPS&amp;C. DCI’s annual report contains statistics for the financial reporting year and can be compared to the previous year data.</p> <p data-bbox="244 524 1490 654">Investigations (both criminal and administrative) review all details, including what staff actions or inactions may have led to the sexual abuse and/or sexual harassment, and these are reviewed at each successive level per DOC policy. Investigative reports are compiled in accordance with DPS&amp;C’s Standardized Case Report Format, which includes descriptions of physical and testimonial evidence as well as the reasoning behind credibility assessments and findings.</p> <p data-bbox="244 683 1477 745">The Warden and PCM stated that the Warden approves the Annual Reports and submits them to the parent agency (DPS&amp;C). Review of this data is accomplished at each level for analysis, determining trends or needs, etc.</p> <p data-bbox="244 775 1477 837">For annual reporting purposes redaction is not needed as it (the report) only contains statistical data and does not make reference to any individual(s).</p>

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Warden, PREA Compliance manager and staff were extremely supportive and made all efforts to ensure full access and ease of audit operation for the auditors, both before and after the site visit and during the time at the prison. Interviews were facilitated and efficiently managed. Timely access to all supporting documentation requested was provided as well as escort to any areas requested. No barriers were encountered in data review, interviews or site review.</p>

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination: Meets Standard</b>
	<b>Auditor Discussion</b>
	The LA DPS&C PREA Coordinator publishes all required reporting data and makes an annual report regarding all sexual abuse data from DPS&C facilities available to the public through DPS&C's website <a href="http://www.doc.la.gov">www.doc.la.gov</a>

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

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

	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
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<b>115.13 (d)</b>	<b>Supervision and monitoring</b>	
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	Has the facility/agency implemented a policy and practice of having intermediate-level or higherlevel supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
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	Is this policy and practice implemented for night shifts as well as day shifts?	yes
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	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
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<b>115.14 (a)</b>	<b>Youthful inmates</b>	
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	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
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<b>115.14 (b)</b>	<b>Youthful inmates</b>	
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	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
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	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
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<b>115.14 (c)</b>	<b>Youthful inmates</b>	
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	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
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	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
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	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
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<b>115.15 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
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	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
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<b>115.15 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	na
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	na
<b>115.15 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	na

<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes

<b>115.15 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes

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

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



	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes

<b>115.16 (c)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
<b>115.17 (a)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
<b>115.17 (b)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
<b>115.17 (c)</b>	<b>Hiring and promotion decisions</b>	

	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
<b>115.17 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
<b>115.17 (e)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
<b>115.17 (f)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
<b>115.17 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	

	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
<b>115.21 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
<b>115.21 (b)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
<b>115.21 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
<b>115.21 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	

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

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

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

	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
<b>115.33 (c)</b>	<b>Inmate education</b>	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes

<b>115.33 (d)</b>	<b>Inmate education</b>	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes

<b>115.33 (e)</b>	<b>Inmate education</b>	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes

<b>115.33 (f)</b>	<b>Inmate education</b>	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes

<b>115.34 (a)</b>	<b>Specialized training: Investigations</b>	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

<b>115.34 (b)</b>	<b>Specialized training: Investigations</b>	
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	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.34 (c)</b>	<b>Specialized training: Investigations</b>	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

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



<b>115.35 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.35 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
<b>115.41 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
<b>115.41 (b)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
<b>115.41 (c)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
<b>115.41 (d)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes

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

<b>115.41 (e)</b>	<b>Screening for risk of victimization and abusiveness</b>	
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	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes

<b>115.41 (f)</b>	<b>Screening for risk of victimization and abusiveness</b>	
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	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
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<b>115.41 (g)</b>	<b>Screening for risk of victimization and abusiveness</b>	
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	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes

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

	When making housing or other program assignments for transgender or intersex inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems?	yes
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<b>115.42 (d)</b>	<b>Use of screening information</b>	
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	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
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<b>115.42 (e)</b>	<b>Use of screening information</b>	
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	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
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<b>115.42 (f)</b>	<b>Use of screening information</b>	
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	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
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<b>115.42 (g)</b>	<b>Use of screening information</b>	
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	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
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	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
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	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
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<b>115.43 (a)</b>	<b>Protective Custody</b>	
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	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
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	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
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<b>115.43 (b)</b>	<b>Protective Custody</b>	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
<b>115.43 (c)</b>	<b>Protective Custody</b>	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
<b>115.43 (d)</b>	<b>Protective Custody</b>	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
<b>115.43 (e)</b>	<b>Protective Custody</b>	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
<b>115.51 (a)</b>	<b>Inmate reporting</b>	

	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes

<b>115.51 (b)</b>	<b>Inmate reporting</b>	
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	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes

<b>115.51 (c)</b>	<b>Inmate reporting</b>	
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	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes

<b>115.51 (d)</b>	<b>Inmate reporting</b>	
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	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
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<b>115.52 (a)</b>	<b>Exhaustion of administrative remedies</b>	
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	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
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<b>115.52 (b)</b>	<b>Exhaustion of administrative remedies</b>	
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	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
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	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (e)</b>	<b>Exhaustion of administrative remedies</b>	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (f)</b>	<b>Exhaustion of administrative remedies</b>	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes

	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (g)</b>	<b>Exhaustion of administrative remedies</b>	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes

<b>115.53 (a)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	yes
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
<b>115.53 (b)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
<b>115.53 (c)</b>	<b>Inmate access to outside confidential support services</b>	



	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
<b>115.54 (a)</b>	<b>Third-party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
<b>115.61 (a)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
<b>115.61 (b)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
<b>115.61 (c)</b>	<b>Staff and agency reporting duties</b>	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
<b>115.61 (d)</b>	<b>Staff and agency reporting duties</b>	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes

<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including thirdparty and anonymous reports, to the facility's designated investigators?	yes
<b>115.62 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
<b>115.63 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.63 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.63 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
<b>115.64 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes

<b>115.64 (b)</b>	<b>Staff first responder duties</b>	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
<b>115.65 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
<b>115.66 (a)</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
<b>115.67 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
<b>115.67 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
<b>115.67 (c)</b>	<b>Agency protection against retaliation</b>	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes

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

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

	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
<b>115.71 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
<b>115.71 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
<b>115.73 (c)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes

	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (d)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (e)</b>	<b>Reporting to inmates</b>	
	Does the agency document all such notifications or attempted notifications?	yes
<b>115.76 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.76 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
<b>115.76 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
<b>115.76 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
<b>115.77 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes

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



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

<b>115.82 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
<b>115.82 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
<b>115.83 (b)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
<b>115.83 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
<b>115.83 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
<b>115.83 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
<b>115.83 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.83 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	

	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes
<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
<b>115.86 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.86 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
<b>115.86 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.86 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

<b>115.87 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
<b>115.87 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
<b>115.87 (c)</b>	<b>Data collection</b>	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
<b>115.87 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.87 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
<b>115.87 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes

<b>115.88 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
<b>115.88 (b)</b>	<b>Data review for corrective action</b>	

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

	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	yes
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes