

# PREA Facility Audit Report: Final

Name of Facility: Wayne County Jail

Facility Type: Prison / Jail

Date Interim Report Submitted: 01/07/2022

Date Final Report Submitted: 06/15/2022

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Robert B. Latham	Date of Signature: 06/15/2022

AUDITOR INFORMATION	
Auditor name:	Latham, Robert
Email:	robertblatham@icloud.com
Start Date of On-Site Audit:	11/15/2021
End Date of On-Site Audit:	11/16/2021

FACILITY INFORMATION	
Facility name:	Wayne County Jail
Facility physical address:	1016 Andrew Jackson Drive, Waynesboro, Tennessee - 38485
Facility mailing address:	1016 Andrew Jackson Drive, Waynesboro, Tennessee - 38485

Primary Contact	
Name:	Katy Lineberry
Email Address:	katy.lineberry@waynecountytn.gov
Telephone Number:	9317229720

Warden/Jail Administrator/Sheriff/Director	
Name:	Captain Billy Horton, J.A.
Email Address:	billy.horton@waynecountytn.gov
Telephone Number:	(931)722-9746

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

Facility Health Service Administrator On-site	
Name:	HSA Mercedes Jones, LPN
Email Address:	waynecotn.admin@qchcweb.net
Telephone Number:	(931)722-9745

Facility Characteristics	
Designed facility capacity:	128
Current population of facility:	131
Average daily population for the past 12 months:	103
Has the facility been over capacity at any point in the past 12 months?	Yes
Which population(s) does the facility hold?	Both females and males
Age range of population:	19-82
Facility security levels/inmate custody levels:	Minimum, Medium, Maximum
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	25
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	0
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	38

AGENCY INFORMATION	
Name of agency:	Wayne County Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	1016 Andrew Jackson Drive, Waynesboro, Tennessee - 38485
Mailing Address:	1016 Andrew Jackson Drive, Waynesboro, Tennessee - 38485
Telephone number:	9317223615

Agency Chief Executive Officer Information:	
<b>Name:</b>	Sheriff Shane Fisher
<b>Email Address:</b>	sheriff.fisher@waynecountytn.gov
<b>Telephone Number:</b>	(931) 722-3615

Agency-Wide PREA Coordinator Information			
<b>Name:</b>	Katy Lineberry	<b>Email Address:</b>	katy.lineberry@waynecountytn.gov

SUMMARY OF AUDIT FINDINGS	
<p>The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.</p> <p>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.</p>	
<b>Number of standards exceeded:</b>	
0	
<b>Number of standards met:</b>	
45	
<b>Number of standards not met:</b>	
0	

# POST-AUDIT REPORTING INFORMATION

## GENERAL AUDIT INFORMATION

### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2021-11-15
2. End date of the onsite portion of the audit:	2021-11-16

### Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	<ol style="list-style-type: none"><li>1. Center for Hope</li><li>2. Maury Regional Medical Center Emergency Department</li><li>3. Just Detention International</li></ol>

## AUDITED FACILITY INFORMATION

14. Designated facility capacity:	128
15. Average daily population for the past 12 months:	103
16. Number of inmate/resident/detainee housing units:	7
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No  <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	134
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	2
40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0

41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0
43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	2
44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	0
46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	5
47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	No text provided.
<b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b>	
49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	25
50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	38
51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0
52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
<b>INTERVIEWS</b>	
<b>Inmate/Resident/Detainee Interviews</b>	
<b>Random Inmate/Resident/Detainee Interviews</b>	

53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	11
54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None
55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	Inmates were selected from all seven housing units.
56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	9
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.  <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Corroboration strategies included discussions with staff and interviews with inmates.</p>
<p><b>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>2</p>
<p><b>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Corroboration strategies included discussions with staff and interviews with inmates.</p>
<p><b>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Corroboration strategies included discussions with staff and interviews with inmates.</p>
<p><b>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Corroboration strategies included discussions with staff and interviews with inmates.</p>
<p><b>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>2</p>
<p><b>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Corroboration strategies included discussions with staff and interviews with inmates.</p>
<p><b>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Corroboration strategies included discussions with staff and interviews with inmates.</p>



68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	5
69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.  <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	Corroboration strategies included discussions with staff and interviews with inmates.
70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.
<b>Staff, Volunteer, and Contractor Interviews</b>	
<b>Random Staff Interviews</b>	
71. Enter the total number of RANDOM STAFF who were interviewed:	12
72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	<input checked="" type="checkbox"/> Length of tenure in the facility <input checked="" type="checkbox"/> Shift assignment <input checked="" type="checkbox"/> Work assignment <input checked="" type="checkbox"/> Rank (or equivalent) <input checked="" type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None
If "Other," describe:	Gender, race, ethnicity, and languages spoken were considered.
73. Were you able to conduct the minimum number of RANDOM STAFF interviews?	<input checked="" type="radio"/> Yes  <input type="radio"/> No

74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
<b>Specialized Staff, Volunteers, and Contractor Interviews</b>	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	12
76. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
78. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
79. Were you able to interview the PREA Compliance Manager?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

<p><b>80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Agency contract administrator</li> <li><input checked="" type="checkbox"/> Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment</li> <li><input type="checkbox"/> Line staff who supervise youthful inmates (if applicable)</li> <li><input type="checkbox"/> Education and program staff who work with youthful inmates (if applicable)</li> <li><input checked="" type="checkbox"/> Medical staff</li> <li><input type="checkbox"/> Mental health staff</li> <li><input checked="" type="checkbox"/> Non-medical staff involved in cross-gender strip or visual searches</li> <li><input checked="" type="checkbox"/> Administrative (human resources) staff</li> <li><input checked="" type="checkbox"/> Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff</li> <li><input checked="" type="checkbox"/> Investigative staff responsible for conducting administrative investigations</li> <li><input type="checkbox"/> Investigative staff responsible for conducting criminal investigations</li> <li><input checked="" type="checkbox"/> Staff who perform screening for risk of victimization and abusiveness</li> <li><input checked="" type="checkbox"/> Staff who supervise inmates in segregated housing/residents in isolation</li> <li><input checked="" type="checkbox"/> Staff on the sexual abuse incident review team</li> <li><input checked="" type="checkbox"/> Designated staff member charged with monitoring retaliation</li> <li><input checked="" type="checkbox"/> First responders, both security and non-security staff</li> <li><input checked="" type="checkbox"/> Intake staff</li> <li><input type="checkbox"/> Other</li> </ul>
<p><b>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b></p>	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> Yes</li> <li><input type="radio"/> No</li> </ul>
<p><b>a. Enter the total number of VOLUNTEERS who were interviewed:</b></p>	<p>3</p>

<p><b>b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)</b></p>	<p><input type="checkbox"/> Education/programming</p> <p><input type="checkbox"/> Medical/dental</p> <p><input type="checkbox"/> Mental health/counseling</p> <p><input checked="" type="checkbox"/> Religious</p> <p><input type="checkbox"/> Other</p>
<p><b>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>a. Enter the total number of CONTRACTORS who were interviewed:</b></p>	<p>2</p>
<p><b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b></p>	<p><input type="checkbox"/> Security/detention</p> <p><input type="checkbox"/> Education/programming</p> <p><input checked="" type="checkbox"/> Medical/dental</p> <p><input type="checkbox"/> Food service</p> <p><input type="checkbox"/> Maintenance/construction</p> <p><input type="checkbox"/> Other</p>
<p><b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b></p>	<p>No text provided.</p>

## SITE REVIEW AND DOCUMENTATION SAMPLING

### Site Review

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

<p><b>84. Did you have access to all areas of the facility?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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### Was the site review an active, inquiring process that included the following:

<p><b>85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
88. Informal conversations with staff during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	No text provided.

### Documentation Sampling

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

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

## SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

### Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	3
<b>Total</b>	0	0	0	3

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0
<b>Total</b>	0	0	0	0

## Sexual Abuse and Sexual Harassment Investigation Outcomes

### Sexual Abuse Investigation Outcomes

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

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

	Ongoing	Referred for Prosecution	Indicted/Court Case Filed	Convicted/Adjudicated	Acquitted
Inmate-on-inmate sexual abuse	0	0	0	0	1
Staff-on-inmate sexual abuse	1	0	0	0	1
<b>Total</b>	1	0	0	0	2

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	0	0	1
Staff-on-inmate sexual abuse	0	0	0	0
<b>Total</b>	0	0	0	1

**Sexual Harassment Investigation Outcomes**

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0
<b>Total</b>	0	0	0	0

**Sexual Abuse and Sexual Harassment Investigation Files Selected for Review**

**Sexual Abuse Investigation Files Selected for Review**

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/sampled:	2
99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)

**Inmate-on-inmate sexual abuse investigation files**

100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	1
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101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
<b>Staff-on-inmate sexual abuse investigation files</b>	
103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	2
104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
<b>Sexual Harassment Investigation Files Selected for Review</b>	
106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	0
a. Explain why you were unable to review any sexual harassment investigation files:	There were no reported sexual harassment allegations.
107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)
<b>Inmate-on-inmate sexual harassment investigation files</b>	
108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0



<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p> <input type="radio"/> Yes  <input type="radio"/> No  <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files) </p>
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<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p> <input type="radio"/> Yes  <input type="radio"/> No  <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files) </p>
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**Staff-on-inmate sexual harassment investigation files**

<p>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
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<p>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p> <input type="radio"/> Yes  <input type="radio"/> No  <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files) </p>
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<p>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p> <input type="radio"/> Yes  <input type="radio"/> No  <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files) </p>
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<p>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>No text provided.</p>
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**SUPPORT STAFF INFORMATION**

**DOJ-certified PREA Auditors Support Staff**

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

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

121. Who paid you to conduct this audit?

- The audited facility or its parent agency
- My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)
- A third-party auditing entity (e.g., accreditation body, consulting firm)
- Other

## Standards

### Auditor Overall Determination Definitions

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

### Auditor Discussion Instructions

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

115.11	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Organizational Chart</li> <li>3. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Documents (Corrective Action):</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA) updated April 18, 2022</li> </ol> <p><b>Interviews:</b></p> <ol style="list-style-type: none"> <li>1. PREA Coordinator</li> <li>2. PREA Compliance Manager</li> </ol> <p><b>Site Review Observations:</b></p> <p>Observations during on-site review of physical plant</p> <p><b>Findings (By Provision):</b></p> <p><b>115.11 (a)</b></p> <p>PAQ: The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment in facilities it operates directly or under contract. The facility has a policy outlining how it will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. The policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment. The policy includes sanctions for those found to have participated in prohibited behaviors. The policy includes a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of inmates.</p> <p>Policy: Pages 1-5 The Wayne County Sheriff's Office (WCSO) is committed to zero tolerance of any form of sexual abuse and sexual harassment in facilities it operates directly or with which it holds contracts for the confinement of inmates. Sexual abuse in correctional facilities is a public safety issue that can impact order and security. The policy outlines the facility's approach to preventing, detecting, and responding to such conduct. The policy includes definitions of prohibited behaviors regarding sexual misconduct, sexual abuse and sexual harassment and includes sanctions for those found to have participated in prohibited behaviors. The policy addresses prevention of sexual abuse and sexual harassment through the designations of a PREA Coordinator, supervision and monitoring, criminal background checks, staff training, inmate education, PREA information and educational materials. The policy addresses detection of sexual abuse and sexual harassment through inmate education, staff training, and intake screening for risk of sexual victimization and abusiveness. The policy addresses responding to sexual abuse and sexual harassment through the various ways of reporting, investigations, disciplinary sanctions for inmates and staff, victim advocacy, access to emergency medical treatment and crisis intervention services, sexual abuse incident reviews, data collection, and data review for corrective action.</p> <p><b>115.11 (b)</b></p> <p>PAQ: The agency employs or designates an upper-level, agency-wide PREA Coordinator. The PREA Coordinator has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards at the facility. The position of the PREA Coordinator is in the agency's organizational structure. The PREA Coordinator reports to the Captain.</p> <p>WCSO employs an upper-level, agency-wide PREA Coordinator. The PREA Coordinator is identified on the WCSO organizational chart as the PREA Coordinator. She confirmed she has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in the jail.</p> <p><b>115.11 (c)</b></p> <p>PAQ: WCSO does not have a designated PREA Compliance Manager.</p> <p><b>Conclusion and Corrective Action:</b></p> <p>Based upon the review and analysis of the available evidence, the auditor has determined the agency and facility is fully compliant with this standard requiring a zero-tolerance policy toward sexual abuse and sexual harassment and the designation of a PREA Coordinator. Corrective action is complete.</p> <p><b>115.11 (a)</b></p> <p>Policy was updated to be inclusive of definitions of prohibited behaviors regarding sexual abuse and sexual harassment and sanctions for those found to have participated in prohibited behaviors (April 18, 2022).</p>

115.12	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Contract: Tennessee Department of Corrections (TDOC)</li> <li>3. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Interview:</b></p> <ol style="list-style-type: none"> <li>1. Agency Contract Administrator</li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.12 (a)</b></p> <p>N/A - The agency does not contract with private agencies or other entities for the confinement of its inmates.</p> <p>PAQ: The agency has entered into or renewed a contract for the confinement of inmates since the last PREA audit. All of the above contracts require contractors to adopt and comply with PREA Standards. Since the last PREA audit:</p> <ol style="list-style-type: none"> <li>1. The number of contracts for the confinement of inmates that the agency entered into or renewed with private entities or other government agencies: 1</li> </ol> <p>Policy states when the Wayne County Sheriff's Office contracts for the confinement of its inmates with private agencies or other entities, including other government agencies, it shall include in any new contract or contract renewal the entity's obligation to adopt and comply with PREA standards.</p> <p>TDOC contracts with WCSO for the confinement of its inmates. The contract language is as follows, "Contract will comply with the Prison Rape Elimination Act of 2003, 42, U.S.C. 15601 et seq., (PREA) and with all applicable PREA Standards for preventing, detecting, monitoring, investigating, and eradicating any form of sexual abuse in the performance of the Contract."</p> <p><b>115.12 (b)</b></p> <p>N/A - The agency does not contract with private agencies or other entities for the confinement of its inmates.</p> <p>Policy states when the Wayne County Sheriff's Office contracts for the confinement of its inmates with private agencies or other entities, including other government agencies, it shall include in any new contract or contract renewal the entity's obligation to adopt and comply with PREA standards.</p> <p>TDOC contracts with WCSO for the confinement of its inmates. The contract language is as follows, "Contract will comply with the Prison Rape Elimination Act of 2003, 42, U.S.C. 15601 et seq., (PREA) and with all applicable PREA Standards for preventing, detecting, monitoring, investigating, and eradicating any form of sexual abuse in the performance of the Contract."</p> <p><b>Conclusion:</b></p> <p>Based upon the review and analysis of the available evidence, the auditor has determined the agency is fully compliant with this standard regarding contracting with other entities for the confinement of inmates. No corrective action is required.</p>

115.13	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Staffing Plan</li> <li>3. 2021 Staffing Plan Assessment</li> <li>4. Daily Staffing Assessment Form</li> <li>5. Supervisory Monitoring Logs (Unannounced Rounds)</li> <li>6. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Documents (Corrective Action):</b></p> <ol style="list-style-type: none"> <li>1. Supervisory Monitoring Logs (Unannounced Rounds) (April 25, 2022)</li> <li>2. 2022 Staffing Plan Assessment (January 19, 2022)</li> </ol> <p><b>Interviews:</b></p> <ol style="list-style-type: none"> <li>1. Warden or Designee (Captain)</li> <li>2. PREA Coordinator</li> <li>3. Intermediate or Higher-Level Facility Staff</li> </ol> <p><b>Site Review Observations:</b></p> <p>Observations during onsite review of facility</p> <p><b>Findings (by provision):</b></p> <p><b>115.13 (a)</b></p> <p>PAQ: Since the last PREA audit:</p> <ol style="list-style-type: none"> <li>1. The average daily number of inmates: 103</li> <li>2. The average daily number of inmates on which the staffing plan was predicated: 128</li> </ol> <p>Policy states in the process of creating and revising a staffing plan to provide for adequate levels of staffing and video monitoring to protect inmates against sexual abuse, the Wayne County Sheriff's Office shall ensure that the following factors are taken into consideration:</p> <ol 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 findings 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 facility's physical plan;</li> <li>6. The composition of the inmate population;</li> <li>7. The number and placement of supervisory staff;</li> <li>8. 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; and</li> <li>11. Any other relevant factors.</li> </ol> <p>The auditor reviewed the facility staffing plan for verification the staffing plan fully inclusive of the standard provision requirements.</p> <p>The Captain and PREA Coordinator confirmed the facility regularly develops a staffing plan, maintains adequate staffing levels to protect inmates against sexual abuse, considers video monitoring as part of the plan, and documents the plan. When assessing staffing levels and the need for video monitoring, the staffing plan considers: generally accepted detention and correctional practices; any judicial findings of inadequacy; any findings of inadequacy from Federal investigative agencies; any findings of inadequacy from internal or external oversight bodies; all components of the facility's physical plant (including "blind spots" or areas where staff or inmates may be isolated); the composition of the inmate population; the number and placement of supervisory staff; institution programs occurring on a particular shift; any applicable State or local laws, regulations, or standards; the prevalence of substantiated and unsubstantiated incidents of sexual abuse; and any other relevant factors.</p> <p><b>115.13 (b)</b></p> <p>PAQ: Each time the staffing plan is not complied with, the facility documents and justifies all deviations from the staffing plan.</p> <p>Policy states the Wayne County Sheriff's Office shall make its best efforts to comply with the staffing and video monitoring</p>

plan and, in circumstances where it is not complied with, shall document and justify all deviations. The 115.13 Daily Staffing Assessment form shall document deviations from the staffing plan and show measures taken to solve any issues with staffing inadequacies.

The Captain confirmed he checks for compliance with the staffing plan by reviewing daily deviations of the staffing plan.

The auditor reviewed the Daily Staffing Assessment Form. The form includes areas to document the reasons for deviation and measures taken to meet compliance with the staffing plan.

**115.13 (c)**

PAQ: At least once every year the agency or facility, in collaboration with the PREA Coordinator, reviews the staffing plan to see whether adjustments are needed to:

1. The staffing plan;
2. Prevailing staffing patterns;
3. The deployment of monitoring technology; or
4. The allocation of agency or facility resources to commit to the staffing plan to ensure compliance with the staffing plan.

Policy states at least once every year, and in collaboration with the PREA Coordinator, the Wayne County Sheriff's Office shall conduct an assessment to determine whether adjustments are needed to the staffing plan and the deployment of video monitoring systems and other technologies.

The PREA Coordinator confirmed she is consulted regarding any assessments of, or adjustments to, the staffing plan. She confirmed the assessments did not occur in 2019 and 2020. The assessments are documented through the Annual PREA Staffing Plan Assessment.

The auditor reviewed the 2021 Facility Annual Staffing Report for verification it is inclusive of the standard provision requirements.

**115.13 (d)**

PAQ: The facility requires that intermediate-level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. The facility documents unannounced rounds. The unannounced rounds cover all shifts. The facility prohibits staff from alerting other staff of the conduct of such rounds.

Policy states supervisors shall conduct and document unannounced rounds covering all shifts, and all areas of the facility, to identify and deter staff sexual abuse or harassment. The Wayne County Sheriff's Office policy prohibits staff members who are aware of these rounds from alerting other staff as to when or where these rounds are occurring, unless related to the legitimate operational needs of the facility. The PREA Coordinator shall determine how and when the unannounced rounds will be conducted and shall review all documentation from the rounds. Supervisors will complete the 115.13.1 Supervisory Monitoring Log form to document unannounced rounds.

The auditor reviewed documentation showing that unannounced rounds are occurring as required by policy, the exception of being conducted in all areas of the facility. The facility records the unannounced rounds on the Supervisory Monitoring Log.

An interview with the Nightshift Supervisor confirmed she conducts unannounced rounds. They are conducted on all shifts and she stated she conducts the unannounced rounds at random times and does not announce the purpose of the rounds. She documents them on the Supervisory Monitoring Log.

**Conclusion and Corrective Action:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding supervision and monitoring. Corrective action is complete.

**115.13 (c)**

Staffing plan reviews were not occurring annually. A 2022 staffing plan review was completed (January 19, 2022).

**115.13 (d)**

Unannounced rounds were updated to include all areas of the facility (April 25, 2022).

115.14	<b>Youthful inmates</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Interviews:</b></p> <ol style="list-style-type: none"> <li>1. Line Staff who Supervise Youthful Inmates</li> <li>2. Education and Program Staff who Work with Youthful Inmates</li> <li>3. Youthful Inmates</li> </ol> <p><b>Site Review Observations:</b></p> <p>Observations during on-site review of physical plant</p> <p><b>Findings (By Provision):</b></p> <p><b>115.14 (a)</b></p> <p>PAQ: The facility prohibits placing youthful inmates in a housing unit in which a youthful inmate will have sight, sound, or physical contact with any adult inmate through use of a shared dayroom or other common space, shower area, or sleeping quarters. The facility does not have housing units to which youthful offenders are assigned that provide sight and sound separation between youthful and adult offenders in dayrooms, common areas, showers, and sleeping quarters. The facility does not place youthful inmates in the SAME HOUSING UNIT as adults.</p> <p>In the past 12 months:</p> <ol style="list-style-type: none"> <li>1. The number of youthful inmates housed at this facility: 0; The facility never holds youthful inmates.</li> <li>2. The number of housing units to which youthful offenders are assigned that provide sight and sound separation between youthful and adult offenders in dayrooms, common areas, showers, and sleeping quarters: 0</li> <li>3. The number of youthful inmates placed in the SAME HOUSING UNIT as adults in this facility: 0</li> </ol> <p>Policy states the Wayne County Sheriff's Office does not house youthful inmates unless exigent circumstances arise. If such circumstances arise, the WCSO will either:</p> <ol style="list-style-type: none"> <li>a. Maintain sight and sound separation between youthful inmates and adult inmates, or</li> <li>b. Provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact.</li> </ol> <p>The WCSO will transport youthful inmates to and from their current housing facility during the trial process.</p> <p><b>PREA Site Review:</b></p> <p>The auditor observed not youthful inmates.</p> <p><b>Review:</b></p> <p>There were no youthful inmates on the daily population report for the two days of the audit.</p> <p><b>115.14 (b)</b></p> <p>PAQ: The facility maintains sight, sound, and physical separation between youthful inmates and adult inmates in areas OUTSIDE HOUSING UNITS. The agency always provides direct staff supervision in areas OUTSIDE HOUSING UNITS where youthful inmates have sight, sound, or physical contact with adult inmates.</p> <p>Policy states the Wayne County Sheriff's Office does not house youthful inmates unless exigent circumstances arise. If such circumstances arise, the WCSO will either:</p> <ol style="list-style-type: none"> <li>a. Maintain sight and sound separation between youthful inmates and adult inmates, or</li> <li>b. Provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact.</li> </ol> <p><b>115.14 (c)</b></p> <p>PAQ: The facility documents the exigent circumstances of each instance in which youthful inmates' access to large-muscle exercise, legally required education services, and other programs and work opportunities was denied.</p> <p>In the past 12 months, the number of youthful inmates who have been placed in isolation in order to separate them from adult inmates: 0</p> <p><b>Conclusion:</b></p> <p>Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding youthful inmates. No corrective action is required.</p>



115.15	<b>Limits to cross-gender viewing and searches</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 1086 300"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="240 304 376 331"><b>Documents:</b></p> <ol data-bbox="240 336 943 434" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Cross Gender Searches Form</li> <li>3. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 461 584 488"><b>Documents (Corrective Action):</b></p> <ol data-bbox="240 492 1469 622" style="list-style-type: none"> <li>1. Training Curriculum: cross-gender pat-down searches and searches of transgender and intersex inmates (November 30, 2021)</li> <li>2. Staff Training Records Confirming Receipt of the Searches Training (May 2, 2022)</li> <li>3. Cross-Gender Searches Form (November 30, 2021)</li> </ol> <p data-bbox="240 649 363 676"><b>Interviews:</b></p> <ol data-bbox="240 680 596 779" style="list-style-type: none"> <li>1. Random Sample of Staff</li> <li>2. Random sample of Inmates</li> <li>3. Transgender or Intersex Inmates</li> </ol> <p data-bbox="240 806 528 833"><b>Site Review Observations:</b></p> <p data-bbox="240 837 679 864">Observations during onsite review of facility</p> <p data-bbox="240 900 507 927"><b>Findings (By Provision):</b></p> <p data-bbox="240 931 349 958"><b>115.15 (a)</b></p> <p data-bbox="240 963 1337 990">PAQ: The facility does not conduct cross-gender strip or cross-gender visual body cavity searches of inmates.</p> <p data-bbox="240 1025 469 1052">In the past 12 months:</p> <ol data-bbox="240 1057 1433 1155" style="list-style-type: none"> <li>1. The number of cross-gender strip or cross-gender visual body cavity searches of inmates: 0</li> <li>2. The number of cross-gender strip or cross-gender visual body cavity searches of inmates that did not involve exigent circumstances or were performed by non-medical staff: 0</li> </ol> <p data-bbox="240 1182 1481 1312">Policy states the Wayne County Sheriff's Office shall not conduct cross-gender strip searches (meaning a search that requires a person to remove or arrange clothing so as to permit a visual inspection of their breasts, buttocks, or genitalia) or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners.</p> <p data-bbox="240 1339 352 1366"><b>115.15 (b)</b></p> <p data-bbox="240 1370 1474 1469">PAQ: The facility does not permit cross-gender pat-down searches of female inmates, absent exigent circumstances. The facility does not restrict female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision.</p> <p data-bbox="240 1473 469 1500">In the past 12 months:</p> <ol data-bbox="240 1505 1485 1603" style="list-style-type: none"> <li>1. The number of pat-down searches of female inmates that were conducted by male staff: 0</li> <li>2. The number of pat-down searches of female inmates conducted by male staff that did not involve exigent circumstance(s): 0</li> </ol> <p data-bbox="240 1630 1457 1693">Policy states cross-gender inmate frisk/pat searches of female inmates by male employees is prohibited except in exigent circumstances.</p> <p data-bbox="240 1720 1485 1818">Female inmates interviewed confirmed no male staff have performed a pat-down search of their body. Staff interviewed confirmed they are restricted from conducting cross-gender pat-down searches. No staff interviewed provided an example of a circumstance that would warrant such a search.</p> <p data-bbox="240 1845 352 1872"><b>115.15 (c)</b></p> <p data-bbox="240 1877 1426 1975">PAQ: Facility policy requires that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches be documented. Facility policy requires that all cross-gender pat-down searches of female inmates be documented.</p> <p data-bbox="240 2002 1474 2101">Policy states the facility shall document all cross-gender strip searches and body cavity searches of inmates and all cross-gender pat-down searches of female inmates. The 115.15 Cross Gender Searches form will be completed to document any cross-gender searches.</p> <p data-bbox="240 2128 1485 2154">The auditor reviewed the Cross Gender Searches Form. The form allows users to document all cross-gender strip searches,</p>

cross-gender visual body cavity searches, and cross-gender pat-down searches.

**115.15 (d)**

PAQ: The facility has implemented policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera). Policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit.

Policy states the facility shall enable 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. Staff members of the opposite gender shall announce their presence when entering an inmate housing unit.

Staff interviews confirmed staff of the opposite gender announce their presence when entering a housing unit that houses inmates of the opposite gender. Interviews also confirmed inmates are able to dress, shower and performing bodily functions without being viewed by staff of the opposite gender. Interviews with inmates corroborated that staff announce their presence when entering a housing unit that houses inmates of the opposite gender. All inmates stated they are never fully naked in full view of staff of the opposite gender.

**PREA Site Review:**

Inmates are able to shower, perform bodily functions, and change clothing behind the privacy of a shower curtain. Staff are required to verbally announce prior to entering a living unit where inmates of the opposite gender are housed. Also, the auditor observed signs at the entrance to each living unit reminding staff to make the announcements.

**115.15 (e)**

PAQ: The facility has a policy prohibiting staff from searching or physically examining a transgender or intersex inmates for the sole purpose of determining the inmate's genital status. No such searches occurred in the past 12 months.

Policy states no staff member shall conduct a search of a transgender or intersex inmate solely for the purpose of determining genital status. If the inmate's genital status is unknown, it may be determined 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.

Interviews with staff confirmed they are aware of the policy prohibiting them from searching or physically examining a transgender or intersex inmate for the purpose of determining the inmate's genital status. No inmates identified as transgender or intersex.

**115.15 (f)**

The percent of all security staff who received training on conducting cross-gender pat-down searches and searches of transgender and intersex inmates in a professional and respectful manner, consistent with security needs: 100%

Policy states security staff employees shall be trained in how to conduct cross-gender pat-down searches, and 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.

Staff interviewed confirmed they have received training on how to conduct cross-gender pat down searches and searches of transgender and intersex inmates in a professional and respectful manner, consistent with security needs.

The auditor has requested the training curriculum and staff training records to verify the training has been completed.

**Conclusion and Corrective Action:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is compliant with this standard regarding limits to cross-gender viewing and searches. Corrective action is complete.

**115.15 (c)**

A form to document cross-gender searches was developed (November 30, 2021).

**115.15 (f)**

Staff training on conducting cross-gender pat-down searches and searches of transgender and intersex inmates was completed (May 2, 2022). The training curriculum was uploaded (November 30, 2021).

115.16	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="240 306 376 329"><b>Documents:</b></p> <ol data-bbox="240 338 1177 499" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Policy Subsection: Inmates with Disabilities and Inmates who are Limited English Proficient</li> <li>3. AVAZA Language Services Corporation</li> <li>4. PREA Pamphlets (English and Spanish)</li> <li>5. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 530 584 557"><b>Documents (Corrective Action):</b></p> <ol data-bbox="240 566 882 728" style="list-style-type: none"> <li>1. Staff Training: AVAZA Language Services (February 28, 222)</li> <li>2. PREA Pamphlet: Braille (May 18, 2022)</li> <li>3. PREA Pamphlet: Limited Reading Skills (May 18, 2022)</li> <li>4. Inmates with Disabilities Procedures (May 18, 2022)</li> <li>5. Kiosk: PREA Information Available in Spanish (June 6, 2022)</li> </ol> <p data-bbox="240 759 363 786"><b>Interviews:</b></p> <ol data-bbox="240 795 882 884" style="list-style-type: none"> <li>1. Agency Head or Designee (Captain)</li> <li>2. Random Sample of Staff</li> <li>3. Inmates (with disabilities or who are limited English proficient)</li> </ol> <p data-bbox="240 893 509 920"><b>Site Review Observations:</b></p> <p data-bbox="240 929 679 956">Observations during onsite review of facility</p> <p data-bbox="240 987 504 1014"><b>Findings (By Provision):</b></p> <p data-bbox="240 1023 349 1050"><b>115.16 (a)</b></p> <p data-bbox="240 1059 1474 1113">PAQ: The agency has established procedures to provide disabled inmates 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.</p> <p data-bbox="240 1144 1490 1534">Policy states the Wayne County Sheriff's Office shall 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, or those who have intellectual, psychiatric or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include, when necessary to ensure effective communication with inmates who are deaf or hard of hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In addition, WCSO Programs Staff shall 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, limited reading skills, or who are blind or have low vision. WCSO Programs Staff is not required to take actions that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title II of the Americans with Disabilities Act, 28 CFR 35.164.</p> <p data-bbox="240 1568 1490 1733">WCSO uses AVAZA Language Services Corporation for language interpreting services, including American Sign Language (ASL). If an inmate is deaf or hearing impaired, the inmate will be offered the use of the TDD Phone in the booking area. This service allows the inmate to communicate while at the WCJ so that his/her needs are met according to PREA. A designated Programs Staff Member will be assigned to an inmate for assistance if they are blind or have low vision or if they have intellectual, psychiatric, or speech disabilities.</p> <p data-bbox="240 1765 1490 1818">The Captain confirmed the agency has established procedures to provide disabled inmates 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.</p> <p data-bbox="240 1850 1490 1904">Two inmates with cognitive disabilities confirmed they were provided information about sexual abuse and sexual harassment that they are able to understand.</p> <p data-bbox="240 1935 1458 1998"><b>PREA Site Review:</b> The auditor did not observe posted PREA information, available in manners that accommodate non-English proficient inmates, in the housing areas. Spanish language information was observed in the intake/reception area.</p> <p data-bbox="240 2029 349 2056"><b>115.16 (b)</b></p> <p data-bbox="240 2065 1458 2154">PAQ: The agency has established procedures to provide inmates with limited English proficiency 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.</p>

Policy states the Wayne County Sheriff's Office shall take reasonable steps to ensure meaningful access to all aspects of its efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who have limited English proficiency, including by providing interpreters who can interpret effectively, accurately, and impartially.

WCSO uses AVAZA Language Services Corporation for language interpreting services, including American Sign Language (ASL).

**115.16 (c)**

PAQ: Agency policy prohibits use of inmate interpreters, inmate readers, or other types of inmate assistants 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 § 115.364, or the investigation of the inmate's allegations. The agency or facility documents the limited circumstances in individual cases where inmate interpreters, readers, or other types of inmate assistants are used.

In the past 12 months, the number of instances where inmate interpreters, readers, or other types of inmate assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the inmate's safety, the performance of first-response duties under § 115.364, or the investigation of the inmate's allegations: 0

Policy states the Wayne County Sheriff's Office shall not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise an inmate's safety, the performance of first responder duties, or the investigation of an inmate's allegations.

Staff interviews confirmed the agency would use a Spanish speaking staff member or a language service for interpretation. No staff interviewed had any knowledge of inmate interpreters, inmate readers, or any other types of inmate assistants being used in relation to allegations of sexual abuse or sexual harassment.

**Conclusion and Corrective Action:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding inmates with disabilities and inmates who are limited English proficient. Corrective action is complete.

**115.16 (a)**

The agency developed written materials to ensure effective communication with inmates with disabilities, including inmates who have intellectual disabilities, limited reading skills, or who are blind or have low vision. The PREA pamphlet is available in Braille and for inmates with limited reading skills and inmates who have intellectual disabilities (May 18, 2022).

**115.16 (b)**

The agency updated the kiosk to include Spanish language PREA information in the housing areas (June 6, 2022).

115.17	<b>Hiring and promotion decisions</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Criminal Record Background Checks</li> <li>3. Self-Declaration of Sexual Abuse/Sexual Harassment</li> <li>4. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Documents (Corrective Action):</b></p> <ol style="list-style-type: none"> <li>1. Five Year Criminal Record Background Checks (December 18, 2021)</li> <li>2. Criminal Record Background Checks: Contractors (December 12, 2021)</li> <li>3. Self-Declaration Form Updated to Consider Sexual Harassment (May 13, 2022)</li> <li>4. PREA Questionnaire for Prior Institutional Employers (May 13, 2022)</li> </ol> <p><b>Interviews:</b></p> <ol style="list-style-type: none"> <li>1. Administrative (Human Resources) Staff</li> </ol> <p><b>Findings (By Provision):</b></p> <p><b>115.17 (a)</b></p> <p>PAQ: Agency policy prohibits hiring or promoting anyone who may have contact with inmates, and prohibits enlisting the services of any contractor who may have contact with inmates, who:</p> <ol style="list-style-type: none"> <li>1. Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997);</li> <li>2. Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or</li> <li>3. Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.</li> </ol> <p>Policy states the Wayne County Sheriff's Office shall not hire or promote anyone who may have contact with inmates, or retain the services of any contractor who may have contact with inmates, who -</p> <ol style="list-style-type: none"> <li>1. Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution; or</li> <li>2. Has been convicted of, or civilly or administratively adjudicated for, engaging or attempting to engage in sexual activity in the community facilitated by force, threats of force, or coercion, or if the victim did not consent or was unable to consent.</li> </ol> <p>The 115.17 PREA Employment Questionnaire form will be completed upon application for employment.</p> <p>The auditor reviewed a Self-Declaration of Sexual Abuse/Sexual Harassment for one person hired in the 12 months preceding the audit and observed the three (3) questions regarding past conduct were asked and answered. Further examples were provided through corrective action (May 13, 2022).</p> <p>The HR staff interview supported the documented evidence. The facility asks all applicants and employees about previous misconduct in written applications for hiring and promotions and in written self-evaluations conducted as part of reviews for current employees.</p> <p><b>115.17 (b)</b></p> <p>PAQ: Agency policy requires the consideration of any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.</p> <p>Policy states the Wayne County Sheriff's Office shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to retain the services of any contractor, who may have contact with inmates.</p> <p>The HR staff confirmed the department considers prior incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with the inmates.</p> <p>Sexual harassment was added to the PREA Self Declaration Form through corrective action (May 13, 2022).</p> <p><b>115.17 (c)</b></p> <p>PAQ: Agency policy requires that before it hires any new employees who may have contact with inmates, it (a) conducts criminal background record checks, and (b) consistent with federal, state, and local law, makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending</p>

investigation of an allegation of sexual abuse.

During the past 12 months:

The number of persons hired who may have contact with inmates who have had criminal background record checks: 14

Policy states before hiring new employees who may have contact with inmates, the Wayne County Sheriff's Office shall:

- a. Perform a criminal background records check; and
- b. 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.

The HR staff confirmed the department performs criminal background record checks and considers pertinent civil or administrative adjudications for all newly hired employees who may have contact with the inmates and all employees, who may have contact with inmates who are being considered for promotions.

The auditor reviewed records of background checks of personnel hired in the past 12 months for verification they are conducted in compliance with the standard provision.

**115.17 (d)**

PAQ: Agency policy requires that a criminal background records check be completed before enlisting the services of any contractor who may have contact with inmates.

During the past 12 months:

1. The number of contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with inmates: 1
2. The percent of contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with inmates: 100%

Policy states the Wayne County Sheriff's Office shall also perform a criminal background records check before retaining the services of any contractor who may have contact with inmates.

The HR staff confirmed the department performs criminal background record checks and considers pertinent civil or administrative adjudications for all contractors who may have contact with the inmates and all contractors, who may have contact with inmates who are being considered for promotions.

The auditor reviewed records of background checks of contractors who might have contact with inmates for verification they are conducted in compliance with the standard provision.

**115.17 (e)**

PAQ: Agency policy requires that either criminal background records checks be conducted at least every five years of current employees and contractors who may have contact with inmates or that a system is in place for otherwise capturing such information for current employees.

Policy states the Wayne County Sheriff's Office shall 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.

The interview with the HR staff confirmed WCSO requires that criminal background records checks be conducted at least every five years of current employees and contractors who may have contact with inmates.

The auditor reviewed records of criminal background records checks of twenty-three personnel for verification they are conducted in compliance with the standard provision. Two of the records indicated the staff did not have criminal background records checks completed at least every five years. The facility corrected the omission and completed the two criminal background records checks (December 18, 2021).

**115.17 (f)**

Policy states the Wayne County Sheriff's Office shall not hire or promote anyone who may have contact with inmates, or retain the services of any contractor who may have contact with inmates, who -

1. Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution; or
2. Has been convicted of, or civilly or administratively adjudicated for, engaging or attempting to engage in sexual activity in the community facilitated by force, threats of force, or coercion, or if the victim did not consent or was unable to consent.

The Wayne County Sheriff's Office shall ask all applicants and employees who may have direct contact with inmates about previous misconduct described in this section, in:

- a. Written applications and/or interviews for hiring or promotion; and
- b. Interviews or written self-evaluations conducted as part of reviews of current employees.

The Wayne County Sheriff's Office shall impose on its current employees a continuing affirmative duty to disclose any of the misconduct described in this section.

The auditor reviewed a Self-Declaration of Sexual Abuse/Sexual Harassment for one person hired in the 12 months preceding the audit and observed the three (3) questions regarding past conduct were asked and answered. No further examples have been provided for additional persons hired in the 12 months preceding the audit, annual employee evaluations, or promotions.

**115.17 (g)**

PAQ: Agency policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

Policy states material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

**115.17 (h)**

Policy states unless prohibited by law, the Wayne County Sheriff's Office shall 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.

The HR staff confirmed when a former employee applies for work at another institution, upon request from that institution, facility provides information on substantiated allegations of sexual abuse or sexual harassment involving the former employee.

**Conclusion and Corrective Action:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding hiring and promotion decisions. Corrective action is complete.

**115.17 b)**

The Self-Declaration Form was updated to consider sexual harassment and examples were provided (May 13, 2022).

**115.17 (c)**

The facility provided examples of the PREA Questionnaires for Prior Institutional Employers (May 13, 2022).

**115.17 (d)**

The facility provided examples of criminal record background checks for contractors (December 12, 2021).

**115.17 (e)**

The facility provided examples of five-year criminal record background checks (December 18, 2021).

**115.17 (f)**

The facility provided Self-Declaration Forms for documentation regarding past conduct is asked and answered in written applications and/or interviews for hiring or promotion and interviews or written self-evaluations conducted as part of reviews of current employees.

<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Facility Schematics</li> <li>3. Description of Video Monitoring Updates</li> <li>4. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Interviews:</b></p> <ol style="list-style-type: none"> <li>1. Agency Head or Designee/ Superintendent (Captain)</li> </ol> <p><b>Site Review Observations:</b></p> <p>Observations during on-site review of physical plant</p> <p><b>Findings (By Provision):</b></p> <p><b>115.18 (a)</b></p> <p>PAQ: The agency or facility has not acquired a new facility or made a substantial expansion or modification to existing facilities since the last PREA audit.</p> <p>Policy states when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the Wayne County Sheriff's Office shall consider the effect of the design, acquisition, expansion, or modification on its ability to protect inmates from sexual abuse.</p> <p>The Captain confirmed the facility would consider the ability to protect inmates from sexual abuse when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities. Also, the agency would consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse.</p> <p><b>115.18 (b)</b></p> <p>PAQ: The agency or facility has installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since the last PREA audit.</p> <p>The Captain confirmed when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency's ability to protect inmates from sexual abuse. He stated body cameras are available to all staff for inmates' and officers' protection.</p> <p><b>Conclusion:</b></p> <p>Based upon the review and analysis of the available evidence, the auditor has determined the agency and facility is fully compliant with this standard regarding upgrades to facilities and technologies. No corrective action is required.</p>



115.21	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Policy Subsection: Responsive Planning</li> <li>3. Tennessee Best Practice Guidelines for Sexual Assault Response Services</li> <li>4. MOU: Maury Regional Medical Center</li> <li>5. MOU: Center for Hope</li> <li>6. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Interviews:</b></p> <ol style="list-style-type: none"> <li>1. PREA Coordinator</li> <li>2. Random Sample of Staff</li> <li>3. SAFEs/SANes (Denver Health Medical Center)</li> <li>4. Inmates who Reported a Sexual Abuse – none identified</li> </ol> <p><b>Findings (By Provision):</b></p> <p><b>115.21 (a)</b></p> <p>PAQ: The facility is responsible for conducting administrative or criminal sexual abuse investigations (including inmate-on-inmate sexual abuse or staff sexual misconduct).</p> <p>Policy states to the extent the Wayne County Sheriff's Office is responsible for investigating allegations of sexual abuse, it shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.</p> <p>Staff interviews confirmed they are knowledgeable of the agency's protocol for obtaining usable physical evidence if a inmates alleges sexual abuse. They were also knowledgeable that the Wayne County Sheriff's Office is responsible for investigating allegations of sexual abuse</p> <p><b>115.21 (b)</b></p> <p>PAQ: The protocol was adapted from or otherwise based on the most recent edition of the DOJ'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.</p> <p>Policy states the protocol shall be developmentally appropriate for youth where applicable, and, as appropriate, shall be adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011.</p> <p>Investigations follow the Tennessee Best Practice Guidelines for Sexual Assault Response Services.</p> <p><b>115.21 (c)</b></p> <p>PAQ: The facility offers all inmates who experience sexual abuse access to forensic medical examinations. Forensic medical examinations are offered without financial cost to the victim. Where possible, examinations are conducted by Sexual Assault Forensic Examiners (SAFes) or Sexual Assault Nurse Examiners (SANes). When SANes or SAFes are not available, a qualified medical practitioner performs forensic medical examinations.</p> <p>In the past 12 months:</p> <ol style="list-style-type: none"> <li>1. The number of forensic medical exams conducted: 0</li> <li>2. The number of exams performed by SANes/SAFes: 0</li> </ol> <p>The number of exams performed by a qualified medical practitioner: 0</p> <p>Forensic medical examinations are conducted at Maury Regional Medical Center. The jail has an MOU with Maury Regional Medical Center for these services.</p> <p>The auditor contacted the Maury Regional Medical Center Emergency Department and determined services would be available to inmate victims of sexual abuse at Wayne County Jail. The hospital does not employ SANes or SAFes, but qualified medical practitioners are available to perform forensic medical examinations.</p> <p><b>115.21 (d)</b></p>

PAQ: The facility makes a victim advocate from a rape crisis center available to the victim, in person or by other means. These efforts are documented. If and when a rape crisis center is not available to provide victim advocate services, the facility provides a qualified staff member from a community-based organization or a qualified agency staff member.

Policy states the Wayne County Sheriff's Office shall 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. The agency shall maintain copies of agreements or documentation showing attempts to enter into such agreements.

The Wayne County Sheriff's Office shall attempt to make available to the victim an advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocacy services, the Wayne County Sheriff's Office shall make available a qualified staff member from a community-based organization, or a qualified agency staff member to provide these services.

Victim advocates are available from Center of Hope. The auditor contacted a sexual assault victims advocate with Center of Hope and determined the center would provide victim advocacy services to victims of sexual abuse. Services would be provided at no cost to the victim. The auditor reviewed an MOU with the center for services.

The PREA Coordinator confirmed victim advocates are available from Center of Hope.

**115.21 (e)**

PAQ: If requested by the victim, a victim advocate, or qualified agency staff member, or qualified community-based organization staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information, and referrals.

Policy states when requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member shall accompany the victim throughout the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals.

The auditor contacted a sexual assault victims advocate with Center of Hope and determined the center would provide victim advocacy services to victims of sexual abuse to include accompanying and supporting the victim through the forensic medical examination process and investigatory interviews and providing emotional support, crisis intervention, information, and referrals.

The PREA Coordinator confirmed if requested by the victim, a victim advocate, or qualified agency staff member, or qualified community-based organization staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information, and referrals. She confirmed the jail has a MOU with Center of Hope for qualified victim advocates.

**115.21 (f)**

PAQ: If the agency is not responsible for administrative or criminal investigating allegations of sexual abuse and relies on another agency to conduct these investigations, the agency has requested that the responsible agency follow the requirements of paragraphs §115.321 (a) through (e) of the standards.

Policy states to the extent the Wayne County Sheriff's Office is not responsible for investigating allegations of sexual abuse, it shall request that the investigating agency follow the requirements of this section.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding evidence protocol and forensic medical examinations. No corrective action is required.

115.22	<b>Policies to ensure referrals of allegations for investigations</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1086 300"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="242 304 376 333"><b>Documents:</b></p> <ol data-bbox="242 338 943 434" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Website</li> <li>3. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="242 463 352 492"><b>Interview:</b></p> <ol data-bbox="242 497 632 557" style="list-style-type: none"> <li>1. Agency Head or Designee (Captain)</li> <li>2. Investigative Staff</li> </ol> <p data-bbox="242 586 504 616"><b>Findings (By Provision):</b></p> <p data-bbox="242 620 349 649"><b>115.22 (a)</b></p> <p data-bbox="242 654 1485 714">PAQ: The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.</p> <p data-bbox="242 743 467 772">In the past 12 months:</p> <ol data-bbox="242 777 1149 873" style="list-style-type: none"> <li>1. The number of allegations of sexual abuse and sexual harassment that were received: 3</li> <li>2. The number of allegations resulting in an administrative investigation: 1</li> <li>3. The number of allegations referred for criminal investigation: 2</li> </ol> <p data-bbox="242 902 1437 931">Referring to allegations received in the past 12 months, all administrative and/or criminal investigations were completed.</p> <p data-bbox="242 960 1469 1021">Policy states the Wayne County Sheriff's Office shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.</p> <p data-bbox="242 1050 1469 1111">The Captain confirmed the agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse or sexual harassment.</p> <p data-bbox="242 1140 1035 1169">The auditor reviewed three investigative reports for allegations of sexual abuse.</p> <p data-bbox="242 1198 352 1227"><b>115.22 (b)</b></p> <p data-bbox="242 1232 1469 1426">The agency has a policy that requires that allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, including the agency if it conducts its own investigations, unless the allegation does not involve potentially criminal behavior. Agency policy regarding the referral of allegations of sexual abuse or sexual harassment for criminal investigation is not published on the agency website or made publicly available via other means. The agency documents all referrals of allegations of sexual abuse or sexual harassment for criminal investigation.</p> <p data-bbox="242 1456 1481 1585">Policy states it is the Wayne County Sheriff's Office's policy to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The Wayne County Sheriff's Office shall document all such referrals. The Wayne County Sheriff's Office shall publish this policy on its website at <a href="http://www.waynetnso.com">www.waynetnso.com</a>.</p> <p data-bbox="242 1615 1465 1711">The investigator interviewed confirmed agency policy requires that allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior.</p> <p data-bbox="242 1740 927 1769">The auditor reviewed the website and observed the published policy.</p> <p data-bbox="242 1798 349 1827"><b>115.22 (c)</b></p> <p data-bbox="242 1832 1485 1892">If a separate entity is responsible for conducting criminal investigations, such publication shall describe the responsibilities of both the agency and the investigating entity.</p> <p data-bbox="242 1921 1067 1951">Wayne County Sheriff's Office is responsible for conducting criminal investigations.</p> <p data-bbox="242 1980 376 2009"><b>Conclusion:</b></p> <p data-bbox="242 2013 1465 2074">Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding policies to ensure referrals of allegations for investigations. No corrective is required.</p>

115.31	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="240 306 376 329"><b>Documents:</b></p> <ol data-bbox="240 338 943 499" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. PREA Employee Training Curriculum</li> <li>3. Staff Receipts of PREA</li> <li>4. Training Records</li> <li>5. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 530 363 553"><b>Interviews:</b></p> <ol data-bbox="240 562 517 589" style="list-style-type: none"> <li>1. Random Sample of Staff</li> </ol> <p data-bbox="240 620 505 647"><b>Findings (By Provision):</b></p> <p data-bbox="240 656 349 683"><b>115.31 (a)</b></p> <p data-bbox="240 692 1257 719">PAQ: The agency trains all employees who may have contact with inmates on the ten required topics.</p> <p data-bbox="240 750 1493 911">Policy states the Wayne County Sheriff's Office is committed to communicating to the inmates at its jail, to its employees, and to contractors and volunteers, the following information through the training, education and orientation programs described in this section: (1) The Wayne County Sheriff's Office's zero tolerance policy; (2) The Wayne County Sheriff's Office's policies to prevent, detect, and respond to sexual abuse and sexual harassment; and (3) Other rights and obligations under this policy.</p> <p data-bbox="240 943 1238 969">The Wayne County Sheriff's Office shall train all employees who may have contact with inmates on:</p> <ol data-bbox="240 978 1485 1368" style="list-style-type: none"> <li>1. Its zero-tolerance policy for sexual abuse, sexual harassment and retaliation;</li> <li>2. How to fulfill their responsibilities regarding prevention, detection, reporting, and response to sexual abuse and sexual harassment;</li> <li>3. Inmates' right to be free from sexual abuse and sexual harassment;</li> <li>4. The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment;</li> <li>5. The dynamics of sexual abuse and sexual harassment in confinement;</li> <li>6. The common reactions of sexual abuse and sexual harassment victims;</li> <li>7. How to detect and respond to signs of threatened and actual sexual abuse;</li> <li>8. How to avoid inappropriate relationships with inmates;</li> <li>9. How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates;</li> <li>10. How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.</li> </ol> <p data-bbox="240 1400 1474 1489">The auditor reviewed PREA training records, PowerPoints, and training curricula. All of the staff interviewed reported receiving the training topics annually, with a majority reporting they received the training in late 2021. The auditor confirmed this by reviewing the 2021 training logs for thirty staff.</p> <p data-bbox="240 1520 352 1547"><b>115.31 (b)</b></p> <p data-bbox="240 1556 1445 1619">PAQ: Training is tailored to the unique needs and attributes and gender of the inmates at the facility. Employees who are reassigned from facilities housing the opposite gender are given additional training.</p> <p data-bbox="240 1650 1453 1740">Policy states training shall be tailored to the gender of the inmates at the employee's facility. The employee shall receive additional training if the employee is reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa.</p> <p data-bbox="240 1771 783 1798">Staff are trained to work with inmates of both genders.</p> <p data-bbox="240 1830 352 1856"><b>115.31 (c)</b></p> <p data-bbox="240 1865 1482 1955">PAQ: Between trainings the agency provides employees who may have contact with inmates with refresher information about current policies regarding sexual abuse and harassment. The frequency with which employees who may have contact with inmates receive refresher training on PREA requirements: Annually</p> <p data-bbox="240 1986 1489 2112">Policy states all current employees shall receive this training, and the Wayne County Sheriff's Office shall provide each employee with refresher training every year to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures. In years in which an employee does not receive refresher training, the Wayne County Sheriff's Office shall provide refresher information on current sexual abuse and sexual harassment policies.</p>

The auditor reviewed the training curricula and staff training logs for 2021.

**115.31 (d)**

PAQ: The agency documents that employees who may have contact with inmates understand the training they have received through employee signature or electronic verification.

Policy states employees shall be required to confirm their understanding of the received training. Signed documentation will be maintained. The 115.31 Staff Receipt of PREA form shall be completed by each employee serving as verification of the employee's review and understanding of the contents of this policy.

The auditor reviewed Staff Receipts of PREA for 2021. Staff sign that they have received training.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding employee training. No corrective action is required.

115.32	<b>Volunteer and contractor training</b>
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

**The following evidence was analyzed in making the compliance determination:**

**Documents:**

1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)
2. PREA Training Curriculum
3. Volunteer and Contractor Receipt of PREA
4. Training Records
5. WCSO Pre-Audit Questionnaire (PAQ)

**Documents (Corrective Action):**

1. Volunteer and Contractor Receipts of PREA (May 23, 2022)

**Interviews:**

Volunteers or Contractors who have Contact with Inmates

**Findings (By Provision):**

**115.32 (a)**

PAQ: All volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response.

The number of volunteers and contractors, who have contact with inmates, who have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response: 38

Policy states the Wayne County Sheriff's Office shall ensure that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the Wayne County Sheriff's Office's sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

The auditor reviewed the training curriculum and found it to be inclusive of the training requirements.

Two volunteers and three contractors interviewed confirmed they have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response.

**115.32 (b)**

PAQ: 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, but all volunteers and contractors who have contact with inmates shall be notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

Policy states the level and type of training provided to volunteers and contractors shall be based on the services they provide and the level of contact they have with inmates, but all volunteers and contractors who have contact with inmates shall be notified of the Wayne County Sheriff's Office's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report such incidents.

**115.32 (c)**

PAQ: The agency maintains documentation confirming that volunteers and contractors understand the training they have received.

Policy states the Wayne County Sheriff's Office shall maintain documentation confirming that volunteers and contractors understand the training they have received. Volunteers and Contractors who have contact with inmates on a recurring basis shall be provided a copy of this policy prior to admission to the facility to begin their assignment or task. The 115.32.1 Volunteer and Contractor Receipt of PREA form serves as verification of the contractor or volunteer's review and understanding of the contents of this policy and shall be completed by each volunteer and contractor who has contact with inmates on a recurring basis.

The auditor reviewed training logs for volunteers and contractors. The facility provided Volunteer and Contractor Receipts of PREA confirming that volunteers and contractors understand the training they have received (May 23, 2022).

**Conclusion and Corrective Action:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding volunteer and contractor training. Corrective action is complete.

**115.32 (c)**

The agency provided Volunteer and Contractor Receipts of PREA (May 23, 2022).

115.33	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="240 306 376 333"><b>Documents:</b></p> <ol data-bbox="240 338 943 533" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. PREA Brochure: End the Silence</li> <li>3. PREA Brochure: What You Need to Know</li> <li>4. Inmate PREA Training Acknowledgement Form</li> <li>5. AVAZA Language Services Corporation</li> <li>6. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 564 584 591"><b>Documents (Corrective Action):</b></p> <ol data-bbox="240 595 975 790" style="list-style-type: none"> <li>1. Inmate PREA Training Acknowledgement Forms (December 10, 2021)</li> <li>2. Staff Training: AVAZA Language Services (February 28, 2022)</li> <li>3. PREA Pamphlet: Braille (May 18, 2022)</li> <li>4. PREA Pamphlet: Limited Reading Skills (May 18, 2022)</li> <li>5. Inmates with Disabilities Procedures (May 18, 2022)</li> <li>6. Kiosk: PREA Information Available in Spanish (June 6, 2022)</li> </ol> <p data-bbox="240 822 363 848"><b>Interviews:</b></p> <ol data-bbox="240 853 549 916" style="list-style-type: none"> <li>1. Intake Staff</li> <li>2. Random Sample of Inmates</li> </ol> <p data-bbox="240 947 528 974"><b>Site Review Observations:</b></p> <p data-bbox="240 978 762 1005">Observations during on-site review of physical plant</p> <p data-bbox="240 1037 505 1064"><b>Findings (By Provision):</b></p> <p data-bbox="240 1068 349 1095"><b>115.33 (a)</b></p> <p data-bbox="240 1099 1477 1162">PAQ: Inmates receive information at time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment.</p> <p data-bbox="240 1193 719 1220">Of inmates admitted during the past 12 months:</p> <p data-bbox="240 1225 842 1252">The number who were given this information at intake: 1110</p> <p data-bbox="240 1256 850 1283">The percent who were given this information at intake: 100%</p> <p data-bbox="240 1314 1453 1413">Policy states during the intake process, inmates shall receive information explaining the Wayne County Sheriff's Office's zero- tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.</p> <p data-bbox="240 1444 1497 1570">The auditor reviewed the PREA Brochure: End the Silence. The PREA Coordinator stated that inmates sign a receipt for the pamphlet at intake. Also, the PAQ indicates all new intakes receive the PREA brochure when they're processed. However, no documentation has been provided to verify that the inmates have received information at time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment.</p> <p data-bbox="240 1601 352 1628"><b>115.33 (b)</b></p> <p data-bbox="240 1632 1370 1659">PAQ: Of inmates admitted during the past 12 months whose length of stay in the facility was for 30 days or more:</p> <ol data-bbox="240 1664 999 1727" style="list-style-type: none"> <li>1. The number who received such education within 30 days of intake: 467</li> <li>2. The percent who received such education within 30 days of intake: 100%</li> </ol> <p data-bbox="240 1758 1477 1883">Policy states within 30 days of intake, the Wayne County Sheriff's Office shall provide comprehensive education to inmates either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and the Wayne County Sheriff's Office's policies and procedures for responding to such incidents.</p> <p data-bbox="240 1915 1433 2013">Inmates interviewed confirmed they were told about their right not to be sexually abused and sexually harassed, how to report sexual abuse or sexual harassment, and their right not to be punished for reporting sexual abuse or sexual harassment. They stated they received PREA education within a month.</p> <p data-bbox="240 2045 1382 2072">The auditor reviewed the PREA Brochure: What You Need to Know to ensure that relevant information is covered.</p> <p data-bbox="240 2103 349 2130"><b>115.33 (c)</b></p> <p data-bbox="240 2134 852 2161">PAQ: All inmates were not educated within 30 days of intake.</p>



Agency policy requires that inmates who are transferred from one facility to another be educated regarding their rights to be free from both sexual abuse/harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents to the extent that the policies and procedures of the new facility differ from those of the previous facility.

Policy states current inmates shall be educated and 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.

The PREA Coordinator stated she ensures inmates are educated on the agency's zero-tolerance policy on sexual abuse and sexual harassment through the inmates signing the Inmate PREA Training Acknowledgement form.

The auditor reviewed twenty-eight PREA Training Acknowledgement Forms. Five of the twenty-eight forms indicated the education was received past 30 days of intake.

**115.33 (d)**

PAQ: Inmate PREA education is available in accessible formats for all inmates including those who are: deaf, otherwise disabled, as well as to inmates who have limited reading skills.

Inmate PREA education was NOT available in accessible formats for all inmates including those who are: Limited English proficient or visually impaired

Policy states the Wayne County Sheriff's Office shall take appropriate steps to ensure that inmates with disabilities have an equal opportunity to benefit from all aspects of the Wayne County Sheriff's Office's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include – when necessary to ensure effective communication with inmates who are deaf or hard of hearing – providing access to interpreters who can interpret effectively, accurately, and impartially.

The Wayne County Sheriff's Office shall take reasonable steps to ensure meaningful access to all aspects of its efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who have limited English proficiency, including by providing interpreters who can interpret effectively, accurately, and impartially.

A designated Programs Staff Member will be assigned to an inmate for assistance if they are blind or have low vision or if they have intellectual, psychiatric, or speech disabilities.

The auditor did not observe Inmate PREA education available in accessible formats for all inmates including those who are: Limited English proficient or visually impaired.

**115.33 (e)**

PAQ: The agency maintains documentation of inmates participation in PREA education sessions.

Policy states the Wayne County Sheriff's Office shall maintain documentation of inmate participation in these education sessions.

The auditor reviewed the PREA Training Acknowledgement Form.

**115.33 (f)**

PAQ: The agency ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, inmates handbooks, or other written formats.

Policy states in addition to providing such education, the facility shall ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats.

The auditor reviewed the PREA Brochures: What You Need to Know and End the Silence. Additional information should be available through posters and other means, such as the kiosk. If an inmate were to not have access to the brochures they would not access to the required information.

**Conclusion and Corrective Action:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding inmate education. Corrective action is complete.

**115.33 (a)**

The agency provided Inmate PREA Training Acknowledgement forms for 20 inmates interviewed and 10 additional inmates the auditor randomly selected from the inmate roster (December 10, 2021).

**115.33 (d)**

The agency developed written materials to ensure effective communication with inmates with disabilities, including inmates

who have intellectual disabilities, limited reading skills, or who are blind or have low vision. The PREA pamphlet is available in Braille and for inmates with limited reading skills and inmates who have intellectual disabilities (May 18, 2022).

**115.33 (f)**

The agency updated the kiosk to include PREA information (English and Spanish) in the housing areas (June 6, 2022).

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

**The following evidence was analyzed in making the compliance determination:**

**Documents:**

1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)
2. WCSO Pre-Audit Questionnaire (PAQ)

**Documents (Corrective Action):**

1. Special Investigator Receipt of PREA (May 26, 2022)
2. Specialized Training Topics (May 23, 2022)

**Interviews:**

1. Investigative Staff

**Findings (By Provision):**

**115.34 (a)**

PAQ: Agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.

Policy states in addition to the general training provided to all employees, the Wayne County Sheriff's Office shall ensure that, to the extent it conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings.

An interview with Investigative Staff confirmed he received training specific to conducting sexual abuse and sexual harassment investigations in confinement settings. He stated he received the training required by §115.31 and completed NIC specialized training topics.

The auditor has requested documentation of the annual training required by §115.31 and specialized training topics to verify compliance with the training requirements.

**115.34 (b)**

Specialized training includes techniques for interviewing juvenile sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

Policy states specialized training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

An interview with Investigative Staff confirmed he received training specific to conducting sexual abuse and sexual harassment investigations in confinement settings. He stated he received the training required by §115.31 and completed NIC specialized training topics.

The auditor requested documentation of the specialized training topics to verify compliance with the training requirements.

**115.34 (c)**

PAQ: The agency maintains documentation showing that investigators have completed the required training. The number of investigators currently employed who have completed the required training: 3

Policy states documentation confirming that investigators have completed the required specialized training in conducting sexual abuse investigations shall be maintained. The 115.34 Special Investigator Receipt of PREA form will document such confirmation.

The auditor requested documentation of the annual training required by §115.31 and specialized training topics to verify compliance with the training requirements.

**Conclusion and Corrective Action:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding specialized training for investigations. Corrective action is complete.

**115.34 (a)**

NIC certificates for the three special investigators was provided May 23, 2022.

**115.34 (b)**

Documentation of the annual training for the three investigators, required by §115.31 was provided May 26, 2022.

115.35	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Documents (Corrective Action):</b></p> <ol style="list-style-type: none"> <li>1. Medical Staff Receipt of PREA (June 3, 2022)</li> <li>2. Specialized Training Topics (June 2, 2022)</li> </ol> <p><b>Interviews:</b></p> <ol style="list-style-type: none"> <li>1. Medical Staff and Mental Health Staff</li> </ol> <p><b>Findings (By Provision):</b></p> <p><b>115.35 (a)</b></p> <p>PAQ: The agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities.</p> <ol style="list-style-type: none"> <li>1. The number of all medical and mental health care practitioners who work regularly at this facility who received the training: 3</li> <li>2. The percent of all medical and mental health care practitioners who work regularly at this facility who received the training required by agency policy: 100%</li> </ol> <p>Policy states the Wayne County Sheriff's Office shall ensure that all full-time and part-time medical and mental health care practitioners who work regularly in its facility have been trained in:</p> <ol style="list-style-type: none"> <li>1. How to detect and assess signs of sexual abuse and sexual harassment;</li> <li>2. How to preserve physical evidence of sexual abuse;</li> <li>3. How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and</li> <li>4. How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.</li> </ol> <p>An interview with medical staff confirmed they have received the specialized training topics regarding sexual abuse and sexual harassment.</p> <p>The auditor requested documentation of the annual training required by §115.31 and specialized training topics to verify compliance with the training requirements.</p> <p><b>115.35 (b)</b></p> <p>PAQ: The jail does not employ medical staff that conduct forensic exams. Forensic medical examinations are performed offsite.</p> <p>An interview with medical staff confirmed forensic medical examinations are not conducted at the jail. Forensic examinations would be conducted at Maury Regional Medical Center.</p> <p><b>115.35 (c)</b></p> <p>PAQ: The agency maintains documentation showing that medical and mental health practitioners have completed the required training.</p> <p>Policy states employees shall be required to confirm their understanding of the received training. Signed documentation will be maintained.</p> <p>The 115.31 Staff Receipt of PREA form shall be completed by each employee serving as verification of the employee's review and understanding of the contents of this policy.</p> <p>The auditor requested documentation of the annual training required by §115.31 and specialized training topics to verify compliance with the training requirements.</p> <p><b>115.35 (d)</b></p> <p>Medical and mental health care practitioners shall also receive the training mandated for employees under § 115.331 or for contractors and volunteers under § 115.332, depending upon the practitioner's status at the agency.</p> <p>Policy is silent on this standard provision.</p> <p>The auditor requested documentation of the annual training required by §115.31 and specialized training topics to verify compliance with the training requirements.</p>

**Conclusion and Corrective Action:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding specialized training for medical and mental health care. Corrective action is complete.

**115.35 (a)**

NIC certificates for two medical and mental health staff was provided June 2, 2022.

**115.35 (d)**

Documentation of the annual training for two medical and mental health staff, required by §115.31 was provided June 3, 2022.

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Risk Screening Instrument</li> <li>3. Reassessments</li> <li>4. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Interviews:</b></p> <ol style="list-style-type: none"> <li>1. PREA Coordinator</li> <li>2. Staff Responsible for Risk Screening</li> <li>3. Random Sample of Inmates</li> </ol> <p><b>Site Review Observations:</b></p> <p>Observations during on-site review of physical plant</p> <p><b>Findings (By Provision):</b></p> <p><b>115.41 (a)</b></p> <p>PAQ: The agency has a policy that requires screening (upon admission to a facility or transfer to another facility) for risk of sexual abuse victimization or sexual abusiveness toward other inmates.</p> <p>Policy states upon admission to the facility, inmates shall be screened by staff to perform the initial intake screening process in order to obtain information relevant to housing, cell, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p>The Staff Responsible for Risk Screening confirmed they screen inmates upon admission to the facility or transfer from another facility for risk of sexual abuse victimization or sexual abusiveness toward other inmates.</p> <p>Twenty inmates were interviewed with the inmate interview protocol. They all confirmed they were asked questions like the following examples at intake:</p> <ol style="list-style-type: none"> <li>1. Have you been in jail or prison before?</li> <li>2. Have you ever been sexually abused?</li> <li>3. Do you identify with being gay, lesbian, or bisexual?</li> <li>4. Do you think you might be in danger of sexual abuse at the facility?</li> </ol> <p><b>115.41 (b)</b></p> <p>PAQ: The policy requires that inmates be screened for risk of sexual victimization or risk of sexually abusing other inmates within 72 hours of their intake.</p> <p>In the past 12 months:</p> <ol style="list-style-type: none"> <li>1. The number of inmates entering the facility (either through intake or transfer) whose length of stay in the facility was for 72 hours or more who were screened for risk of sexual victimization or risk of sexually abusing other inmates within 72 hours of their entry into the facility: 765</li> <li>2. The percent of inmates entering the facility (either through intake or transfer) whose length of stay in the facility was for 72 hours or more who were screened for risk of sexual victimization or risk of sexually abusing other inmates within 72 hours of their entry into the facility: 100%</li> </ol> <p>Policy states intake screening shall ordinarily take place within 72 hours of arrival at the facility.</p> <p>The Staff Responsible for Risk Screening confirmed they screen inmates for risk of sexual victimization or risk of sexually abusing other inmates within 72 hours of their intake.</p> <p>Twenty inmates were interviewed with the inmate interview protocol. They all stated they were asked the questions within three days of intake.</p> <p>The auditor reviewed examples of risk screens for inmates interviewed, and additional documentation for the 12-month audit period. Twenty-five risk screens were reviewed. Two of the twenty-five risk screens were conducted past 72 hours.</p> <p>PREA Site Review: Staff Responsible for Risk Screening reviewed the screening instrument and intake process. Resident files and risk screens are maintained in her office. Initial screening takes place within 72 hours of arrival at the facility. Information received during risk screening that suggests a resident might be at risk for sexual abuse or for abusing other</p>

residents is used to make housing and program assignments.

**115.41 (c)**

PAQ: Risk assessment is conducted using an objective screening instrument.

The auditor observed the objective screening instrument, examples for inmates interviewed, and additional documentation for the 12-month audit period.

**115.41 (d)**

Policy states the intake screening shall 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;
2. The age of the inmate;
3. The physical build of the inmate;
4. Whether the inmate has previously been incarcerated;
5. Whether the inmate's criminal history is exclusively nonviolent;
6. Whether the inmate has prior convictions for sex offenses against an adult or child;
7. Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
8. Whether the inmate has previously experienced sexual victimization;
9. The inmate's perception of his or her own vulnerability to sexual abuse or sexual harassment; and
10. Whether the inmate is detained solely for civil immigration purposes.

The auditor reviewed the inmate risk screen and found it to be inclusive of the required information. Additionally, the Staff Responsible for Risk Screening confirmed the initial risk screening considers all aspects required by the standard.

**115.341 (e)**

Policy states the screening shall identify past victims and/or predators and assess vulnerability to sexual abuse victimization.

The auditor observed the risk screening instrument considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing inmates for risk of being sexually abusive.

The interview with the Staff Responsible for Risk Screening confirmed the initial risk screening considers all of the required criteria. The process for conducting the initial screening includes the inmate answering the questions. If they can't read or don't understand then a staff member reads it to them. The staff know to call the PREA Coordinator if there are three "yes" answers. This would indicate a risk of sexual victimization or risk of sexually abusing other inmates.

**115.41 (f)**

PAQ: The policy requires that the facility reassess each inmate's risk of victimization or abusiveness within a set time period, not to exceed 30 days after the inmate's arrival at the facility, based upon any additional, relevant information received by the facility since the intake screening.

In the past 12 months:

1. The number of inmates entering the facility (either through intake or transfer) who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake: 467
2. The percent of inmates entering the facility (either through intake or transfer) who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake: 100%

Policy states a reassessment of the inmate's risk level of victimization or abusiveness will be conducted by the appropriate staff member. The reassessment shall occur within thirty (30) days of inmate arrival at the facility. The reassessment will include any additional relevant information received by the facility since the initial intake screening.

The 115.41.1 PREA Risk Assessment form will be used for completing the reassessment.

The interview with the Staff Responsible for Risk Screening confirmed the reassessments occur 30 days after arrival at the facility.

The twenty inmates interviewed stated they had reassessments within 30 days of arrival at the facility.

The auditor reviewed examples of reassessments for inmates interviewed, and additional documentation for the 12-month audit period. Thirty reassessments were reviewed. Four of the thirty reassessments were conducted within 30 days of arrival at the facility. One of the reassessments was conducted due to the availability of new information.

**115.41 (g)**



Policy states a reassessment of the inmate's risk level of victimization or abusiveness will be conducted by the appropriate staff member. The reassessment shall occur when warranted, due to referral, request, incident of sexual abuse, or receipt of additional information that may impact the inmate's risk of victimization or abusiveness.

The interview with the Staff Responsible for Risk Screening confirmed reassessment shall occur when warranted, due to referral, request, incident of sexual abuse, or receipt of additional information that may impact the inmate's risk of victimization or abusiveness.

The auditor reviewed examples of reassessments for inmates interviewed, and additional documentation for the 12-month audit period. One of the reassessments was conducted due to the availability of new information.

**115.41 (h)**

PAQ: The policy prohibits disciplining inmates for refusing to answer (or for not disclosing complete information related to questions regarding:

- Whether or not the inmate has a mental, physical, or developmental disability;
- Whether or not the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming;
- Whether or not the inmate has previously experienced sexual victimization; and
- The inmate's own perception of vulnerability.

Policy states inmates may not be disciplined for refusing to answer, or for not disclosing complete information, in response to questions asked pursuant to the following:

- a. Whether the inmate has a mental, physical, or developmental disability;
- b. Whether the inmate is or is perceived to be LGBTI or Gender Non-Conforming;
- c. Whether the inmate has previously experienced sexual victimization; or
- d. The inmate's own perception of vulnerability

The interview with the Staff Responsible for Risk Screening confirmed inmates may refuse to answer without repercussion.

**115.41 (i)**

Policy states all information concerning an event of inmate sexual abuse or sexual harassment is to be treated as confidential. Apart from reporting to designated supervisors or officials, staff shall not reveal any information related to a sexual abuse report to anyone except as specified by the Wayne County Sheriff's Office policy. This information should never be shared with other inmates.

The Wayne County Sheriff's Office shall implement appropriate controls on the dissemination of responses to questions asked pursuant to Screening for risk of Victimization and Abusiveness in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates.

The PREA Coordinator/Staff Responsible for Risk Screening confirmed the agency has outlined who can have access to a inmates' risk assessment within the facility, to protect sensitive information from exploitation. She stated officers keep information confidential and the risk screen information is maintained in the inmates' files.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility fully meets this standard regarding screening for risk of victimization and abusiveness. No corrective action is required.

115.42	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="242 210 451 235"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1086 295"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="242 306 376 331"><b>Documents:</b></p> <ol data-bbox="242 338 943 398" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="242 432 363 456"><b>Interviews:</b></p> <ol data-bbox="242 463 820 555" style="list-style-type: none"> <li>1. PREA Coordinator</li> <li>2. Staff Responsible for Risk Screening</li> <li>3. Transgendered/Intersex/Gay/Lesbian/Bisexual Inmates</li> </ol> <p data-bbox="242 589 528 613"><b>Site Review Observations:</b></p> <p data-bbox="242 620 762 645">Observations during on-site review of physical plant</p> <p data-bbox="242 678 504 703"><b>Findings (By Provision):</b></p> <p data-bbox="242 710 349 734"><b>115.42 (a)</b></p> <p data-bbox="242 741 1406 837">PAQ: The agency/facility uses information from the risk screening required by § 115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p data-bbox="242 871 1481 967">Policy states upon admission to the facility, inmates shall be screened by staff to perform the initial intake screening process in order to obtain information relevant to housing, cell, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p data-bbox="242 1001 1490 1095">The PREA Coordinator/Staff Responsible for Risk Screening confirmed the facility uses information from the risk screening to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p data-bbox="242 1128 349 1153"><b>115.42 (b)</b></p> <p data-bbox="242 1160 1334 1184">PAQ: The agency/facility makes individualized determinations about how to ensure the safety of each inmate.</p> <p data-bbox="242 1218 1477 1274">Policy states screening of inmates should only be used as a guideline for determining appropriate housing and services and should never be used as the sole reason for deprivation of a program or privilege.</p> <p data-bbox="242 1308 1406 1364">The Staff Responsible for Risk Screening stated risk screening provides information to be used to determine housing assignments.</p> <p data-bbox="242 1397 349 1422"><b>115.42 (c)</b></p> <p data-bbox="242 1429 1481 1485">PAQ: The agency or facility makes housing and program assignments for transgender or intersex inmates in the facility on a case-by-case basis.</p> <p data-bbox="242 1518 1473 1648">Policy states in deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, the facility shall consider the transgender or intersex inmate's own views with respect to his or her own safety. The agency shall consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems.</p> <p data-bbox="242 1682 1490 1776">The PREA Coordinator confirmed housing and programming assignments for transgender or intersex inmates are made on a case-by-case basis whether a placement would ensure the inmates' health and safety, and whether the placement would present management or security problems.</p> <p data-bbox="242 1809 1086 1834">No inmates identified as transgender or intersex during the onsite phase of the audit.</p> <p data-bbox="242 1868 349 1892"><b>115.42 (d)</b></p> <p data-bbox="242 1899 1469 1955">PAQ: Placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety experienced by the inmate.</p> <p data-bbox="242 1989 1485 2045">Policy states placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety experienced by the inmate.</p> <p data-bbox="242 2078 1418 2134">The PREA Coordinator/Staff Responsible for Risk Screening confirmed placement and programming assignments are reassessed at least twice each year to review any threats to safety experienced by the inmate.</p>

**115.342 (e)**

PAQ: A transgender or intersex inmate's own views with respect to his or her own safety shall be given serious consideration.

Policy states in deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, the facility shall consider the transgender or intersex inmate's own views with respect to his or her own safety.

The PREA Coordinator/Staff Responsible for Risk Screening confirmed transgender or intersex inmates' views of their safety are given serious consideration in placement and programming assignments.

**115.42 (f)**

Policy states transgender and intersex inmates shall be given the opportunity to shower separately from other inmates.

The PREA Coordinator stated transgender and intersex inmates are given the opportunity to shower separately from other inmates. She elaborated that all inmates shower individually in one-person showers.

No inmates identified as transgender or intersex during the onsite phase of the audit.

PREA Site Review: The auditor observed all inmates shower individually behind the privacy of a shower curtain.

**115.42 (g)**

Policy states the Wayne County Sheriff's Office shall not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status unless pursuant to a legal settlement or judgment.

The PREA Coordinator confirmed the facility does not have a special housing unit for lesbian, gay, bisexual, transgender, or intersex inmates.

One female inmate identified as gay and one female inmate identified as pansexual. Both inmates stated they have not been put in a housing area only for gay, lesbian, bisexual, transgender, or intersex inmates. No inmates identified as transgender or intersex during the onsite phase of the audit.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding use of screening information. No corrective action is required.

115.43	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="240 306 376 333"><b>Documents:</b></p> <ol data-bbox="240 338 943 434" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Housing Unit Placement Form</li> <li>3. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 463 363 490"><b>Interviews:</b></p> <ol data-bbox="240 495 1390 658" style="list-style-type: none"> <li>1. Warden or Designee (Captain)</li> <li>2. PREA Coordinator</li> <li>3. Staff Responsible for Risk Screening</li> <li>4. Staff who Supervise Inmates in Segregated Housing</li> <li>5. Inmates in Segregated Housing (for risk of sexual victimization/who allege to have suffered sexual abuse) - none</li> </ol> <p data-bbox="240 687 528 714"><b>Site Review Observations:</b></p> <p data-bbox="240 719 762 745">Observations during on-site review of physical plant</p> <p data-bbox="240 777 504 804"><b>Findings (By Provision):</b></p> <p data-bbox="240 808 349 835"><b>115.43 (a)</b></p> <p data-bbox="240 840 1469 936">PAQ: The agency has a policy prohibiting the placement of 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.</p> <p data-bbox="240 967 1485 1028">The number of inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment: 0</p> <p data-bbox="240 1059 1453 1187">Policy states inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless the Wayne County Sheriff's Office has assessed all available alternatives and has determined that there is no available alternative means of separation from likely abusers. If the facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.</p> <p data-bbox="240 1218 1485 1314">The Captain confirmed agency policy prohibit placing inmates at high risk for sexual victimization or who have alleged sexual abuse in involuntary segregated housing in lieu of other housing areas, unless an assessment has determined there are no available alternative means of separation from potential abusers.</p> <p data-bbox="240 1346 352 1373"><b>115.43 (b)</b></p> <p data-bbox="240 1377 1422 1438">Policy states if an involuntary segregated housing assignment is made pursuant to this section, the facility shall clearly document:</p> <ol data-bbox="240 1442 959 1503" style="list-style-type: none"> <li>1. The basis for the facility's concern for the inmate's safety; and</li> <li>2. The reason why no alternative means of separation can be arranged.</li> </ol> <p data-bbox="240 1534 1469 1630">Staff Who Supervise Inmates In Segregated Housing confirmed when inmates are placed in segregated housing for protection from sexual abuse or after having alleged sexual abuse they still have access to programs; privileges; education; and work opportunities.</p> <p data-bbox="240 1662 1485 1722">No inmates were in segregated housing (for risk of sexual victimization/who allege to have suffered sexual abuse) during the onsite phase of the audit.</p> <p data-bbox="240 1753 352 1780"><b>115.43 (c)</b></p> <p data-bbox="240 1785 1390 1845">PAQ: In the past 12 months, the number of inmates at risk of sexual victimization who were assigned to involuntary segregated housing for longer than 30 days while awaiting alternative placement: 0</p> <p data-bbox="240 1877 1422 1937">Policy states the facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged. Such an assignment shall not ordinarily exceed a period of 30 days.</p> <p data-bbox="240 1968 1390 2029">The Captain confirmed inmates at high risk for sexual victimization or who have alleged sexual abuse are placed in involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged.</p> <p data-bbox="240 2060 1469 2121">Staff Who Supervise Inmates in Segregated Housing confirmed inmates are placed in involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged.</p>

No inmates were in segregated housing (for risk of sexual victimization/who allege to have suffered sexual abuse) during the onsite phase of the audit.

**115.43 (d)**

PAQ: From a review of case files of inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months, the number of case files that include BOTH:

1. A statement of the basis for facility's concern for the inmate's safety; and
2. The reason or reasons why alternative means of separation could not be arranged: N/A

**115.43 (e)**

Policy states every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.

The 115.42 Housing Unit Placement form will be completed to document reasoning for certain housing placements.

Staff Who Supervise Inmates in Segregated Housing confirmed once an inmate is assigned to involuntary segregated housing, the facility reviews the inmate's circumstances every 30 days to determine if continued placement in involuntary segregated housing is needed. She elaborated that the facility has not had any involuntary segregated housing.

No inmates were in segregated housing (for risk of sexual victimization/who allege to have suffered sexual abuse) during the onsite phase of the audit.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding protective custody. No corrective action is required.

115.51	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="240 306 376 329"><b>Documents:</b></p> <ol data-bbox="240 338 943 465" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. PREA Brochure: End the Silence</li> <li>3. PREA Brochure: What You Need to Know</li> <li>4. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 499 584 521"><b>Documents (Corrective Action):</b></p> <ol data-bbox="240 530 938 658" style="list-style-type: none"> <li>1. PREA Brochure: End the Silence Updated (May 13, 2022)</li> <li>2. PREA Brochure: What You Need to Know Updated (May 18, 2022)</li> <li>3. Phone System Reprogrammed (May 23, 2022)</li> <li>4. Hotline Number Painted/Repainted in Living Units (May 13, 2022)</li> </ol> <p data-bbox="240 692 363 714"><b>Interviews:</b></p> <ol data-bbox="240 723 732 848" style="list-style-type: none"> <li>1. PREA Coordinator</li> <li>2. Random Sample of Staff</li> <li>3. Random Sample of Inmates</li> <li>4. Inmates who Reported a Sexual Abuse (none)</li> </ol> <p data-bbox="240 882 528 904"><b>Site Review Observations:</b></p> <p data-bbox="240 913 762 936">Observations during on-site review of physical plant</p> <p data-bbox="240 969 504 992"><b>Findings (By Provision):</b></p> <p data-bbox="240 1001 349 1023"><b>115.51 (a)</b></p> <p data-bbox="240 1032 1450 1095">PAQ: The agency has established procedures allowing for multiple internal ways for inmates to report privately to agency officials about:</p> <ol data-bbox="240 1104 1134 1196" style="list-style-type: none"> <li>1. Sexual abuse or sexual harassment;</li> <li>2. Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment;</li> <li>3. Staff neglect or violation of responsibilities that may have contributed to such incidents.</li> </ol> <p data-bbox="240 1229 1457 1355">Policy states inmates shall be encouraged to immediately report pressure, threats, or instances of sexual abuse or sexual harassment, as well as possible retaliation by other inmates or employees for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Inmates who are victims of sexual abuse have the option to report an incident in the following ways:</p> <ol data-bbox="240 1364 564 1489" style="list-style-type: none"> <li>a. Tell a staff member.</li> <li>b. Dial 11*75 and report.</li> <li>c. Report on our Kiosk.</li> <li>d. Have a family member call in.</li> </ol> <p data-bbox="240 1523 1457 1680">Staff interviews confirmed inmates can privately report sexual abuse or sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, or staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment by calling the hotline number. Inmates stated they would report sexual abuse or sexual harassment that happened to them or someone else by telling staff, calling the hotline, or writing a grievance.</p> <p data-bbox="240 1713 1474 1771">PREA Site Review: The auditor reviewed the telephone system and other reporting methods. The hotline number is painted on the walls above the telephones. Some numbers needed to be repainted. The inmates can file a grievance with the kiosk.</p> <p data-bbox="240 1805 349 1827"><b>115.51 (b)</b></p> <p data-bbox="240 1836 1466 1962">PAQ: The agency provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of the agency. The agency has a policy requiring inmates detained solely for civil immigration purposes be provided information on how to contact relevant consular officials and relevant officials of the Department of Homeland Security.</p> <p data-bbox="240 1995 1477 2121">Policy states the Wayne County Sheriff's Office shall also provide at least one way for inmates to report abuse, harassment, retaliation, and staff neglect to a public or private entity that is not part of the Wayne County Sheriff's Office, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request.</p>

Inmates can report to the Center of Hope 24-hour hotline and the Waynesboro Police Department.

No reporting method allowed the inmates to remain anonymous upon request.

Wayne County Jail does not detain persons solely for civil immigration purposes.

The PREA Coordinator identified the Center of Hope 24-hour hotline and the Waynesboro Police Department as ways inmates can report sexual abuse or sexual harassment to a public or private entity that is not part of the agency. Inmates stated they would report sexual abuse or sexual harassment that happened to them or someone else by telling staff, calling the hotline, or writing a grievance. Many inmates did not feel they could make a report without having to give their name.

PREA Site Review: The auditor reviewed the telephone system and other reporting methods. The inmates were not allowed to remain anonymous upon request.

**115.51 (c)**

PAQ: The agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties. Staff are required to document verbal reports. The time frame that staff are required to document verbal reports: immediately

Policy states staff shall accept reports made verbally, in writing, and anonymously from third parties and shall promptly document any verbal reports.

The PREA Brochure: What You Need to Know includes information about the inmates' right to report through multiple channels. Additionally, the PREA Brochure: End the Silence provides information on multiple ways to report.

Staff interviewed confirmed verbal reports would be documented.

Inmates interviewed confirmed they can make reports of sexual abuse or sexual harassment either in person or in writing and someone else (for example, a friend or relative) can make the report for them so that they do not have to be named.

**115.51 (d)**

PAQ: The agency has established procedures for staff to privately report sexual abuse and sexual harassment of inmates. Staff may contact the Center of Hope for an external route for reporting.

Staff are informed of these procedures in the following ways: Unknown

Policy states the Wayne County Sheriff's Office shall provide a method for staff to privately report sexual abuse and sexual harassment of inmates.

Staff interviews revealed they would privately report sexual abuse and sexual harassment of inmates by calling the hotline.

**Conclusion and Corrective Action:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding inmate reporting. Corrective action is complete.

**115.51 (b)**

No reporting method allowed the inmates to remain anonymous upon request. The telephone system was reprogrammed (May 23, 2022) to allow inmates to call 11\*75 and make anonymous reports to the Center of Hope. The End the Silence PREA Brochure was updated to inform inmates of this reporting method (May 13, 2022).

**115.51 (d)**

The PAQ indicated staff may contact the Center of Hope for an external route for reporting. The staff PREA brochure was updated to provide staff this information (May 18, 2022).

115.52	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Interviews:</b></p> <p>Inmates who Reported a Sexual Abuse - none</p> <p><b>Site Review Observations:</b></p> <p>Observations during on-site review of physical plant</p> <p><b>Findings:</b></p> <p>This standard does not apply to Wayne County Jail. All grievances regarding sexual abuse are investigated externally by the Wayne County Sheriff's Office.</p> <p>Although there is a grievance procedure available for the inmates, policy dictates that PREA allegations are not officially utilized by the inmates in this capacity. All allegations of sexual abuse or sexual harassment shall be forwarded to the Wayne County Sheriff's Office for investigation.</p> <p><b>Conclusion:</b></p> <p>Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding exhaustion of administrative remedies. No corrective action is required.</p>



115.53	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="240 304 376 331"><b>Documents:</b></p> <ol data-bbox="240 338 943 533" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. MOU: Center of Hope</li> <li>3. PREA Brochure: End the Silence</li> <li>4. PREA Brochure: What You Need to Know</li> <li>5. Discharge Referral Page</li> <li>6. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 562 363 589"><b>Interviews:</b></p> <ol data-bbox="240 595 735 723" style="list-style-type: none"> <li>1. Warden or Designee (Captain)</li> <li>2. PREA Compliance Manager</li> <li>3. Random Sample of Inmates</li> <li>4. Inmates who Reported a Sexual Abuse – none</li> </ol> <p data-bbox="240 752 507 779"><b>Findings (By Provision):</b></p> <p data-bbox="240 786 347 813"><b>115.53 (a)</b></p> <p data-bbox="240 819 1489 880">PAQ: The facility provides inmates access to outside victim advocates for emotional support services related to sexual abuse by:</p> <ol data-bbox="240 887 1469 981" style="list-style-type: none"> <li>1. Giving inmates (by providing, posting, or otherwise making accessible) mailing addresses and telephone numbers (including toll-free hotline numbers where available) of local, State, or national victim advocacy or rape crisis organizations.</li> <li>2. Enabling reasonable communication between inmates and these organizations, in as confidential a manner as possible.</li> </ol> <p data-bbox="240 1010 1046 1037">Wayne County Jail does not detain persons solely for civil immigration purposes.</p> <p data-bbox="240 1066 1477 1227">Policy states the facility shall 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, and for persons detained solely for civil immigration purposes, immigrant services agencies. The facility shall enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible.</p> <p data-bbox="240 1256 1433 1317">Contact information for outside victim advocate services for emotional support related to sexual abuse is included in the PREA Brochure: End the Silence, PREA Brochure: What You Need to Know, and Discharge Referral Page.</p> <p data-bbox="240 1346 403 1373">Center of Hope:</p> <ul data-bbox="240 1379 719 1507" style="list-style-type: none"> <li>• 24 Hour Crisis Line: 931-381-8580</li> <li>• Toll Free Crisis Line: 855-465-4652</li> <li>• Office: 931-840-0916</li> <li>• Address: P.O. Box 1961, Columbia, TN 38402</li> </ul> <p data-bbox="240 1536 1318 1563">Inmates interviewed were unaware of services available outside of this facility for dealing with sexual abuse.</p> <p data-bbox="240 1592 1469 1653">The auditor suggests refresher education and providing additional information to the inmates to improve their knowledge of services available.</p> <p data-bbox="240 1682 1425 1742">PREA Site Review: The auditor tested the telephone system. Calls to the Center of Hope would have to be made upon request.</p> <p data-bbox="240 1783 347 1809"><b>115.53 (b)</b></p> <p data-bbox="240 1816 1457 1944">PAQ: The facility informs inmates, prior to giving them access to outside support services, the extent to which such communications will be monitored. The facility informs inmates, prior to giving them access to outside support services, of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply to disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant Federal, State, or local law.</p> <p data-bbox="240 1973 1477 2067">Policy states the facility shall inform inmates, prior to giving them access to outside advocates, of the extent to which such communications shall be monitored and the extent to which reports of abuse shall be forwarded to authorities in accordance with mandatory reporting laws.</p> <p data-bbox="240 2096 1477 2123">Inmates interviewed knew contacting the sexual abuse hotline or other outside services would be a free call, they knew they</p>

could make a call when needed and their conversation would be private.

Interviews with inmates confirmed they were knowledgeable of mandatory reporting rules when having conversations with people from outside services.

PREA Site Review: The auditor reviewed the telephone system, posters, and brochures. The facility informs inmates, prior to giving them access to outside support services, the extent to which such communications will be monitored.

**115.53 (c)**

PAQ: The agency or facility maintains memoranda of understanding (MOUs) or other agreements with community service providers that are able to provide inmates with emotional support services related to sexual abuse. The agency or facility maintains copies of those agreements.

Policy states the Wayne County Sheriff's Office shall 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. The agency shall maintain copies of agreements or documentation showing attempts to enter into such agreements.

The facility has an MOU with Center of Hope to provide inmates with emotional support services related to sexual abuse.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding inmate access to outside confidential support services and legal representation. No corrective action is required.

115.54	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="242 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="242 306 376 329"><b>Documents:</b></p> <ol data-bbox="242 338 943 499" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Website: Prison Rape Elimination Act (waynetnso.com)</li> <li>3. PREA Brochure: What You Need to Know</li> <li>4. PREA Brochure: End the Silence</li> <li>5. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="242 530 328 553"><b>§115.54</b></p> <p data-bbox="242 562 1465 589">PAQ: The agency or facility provides a method to receive third-party reports of inmate sexual abuse or sexual harassment.</p> <p data-bbox="242 620 1476 714">Policy states the Wayne County Sheriff's Office shall establish a method to receive third-party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate.</p> <p data-bbox="242 745 1310 772">The website states citizens can make third-party notifications of sexual abuse to the Wayne County Jail by:</p> <ul data-bbox="242 781 863 875" style="list-style-type: none"> <li>• Calling the National Sexual Assault Center:800-656-4673;</li> <li>• Calling the Center of Hope 931-381-8580; or</li> <li>• Emailing the PREA Coordinator: klineberry@waynetnso.com</li> </ul> <p data-bbox="242 907 1457 965">The PREA Brochures: What You Need to Know, and End the Silence inform inmates someone can make a report on their behalf.</p> <p data-bbox="242 996 376 1019"><b>Conclusion:</b></p> <p data-bbox="242 1028 1465 1086">Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding third-party reporting. No corrective action is required.</p>

115.61	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="240 306 376 329"><b>Documents:</b></p> <ol data-bbox="240 338 943 398" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 432 363 454"><b>Interviews:</b></p> <ol data-bbox="240 463 592 589" style="list-style-type: none"> <li>1. Warden or Designee (Captain)</li> <li>2. PREA Coordinator</li> <li>3. Random Sample of Staff</li> <li>4. Medical and Mental Health Staff</li> </ol> <p data-bbox="240 622 507 645"><b>Findings (By Provision):</b></p> <p data-bbox="240 654 347 676"><b>115.61 (a)</b></p> <p data-bbox="240 685 1126 712">PAQ: The agency requires all staff to report immediately and according to agency policy:</p> <ol data-bbox="240 721 1453 846" style="list-style-type: none"> <li>1. Any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency.</li> <li>2. Any retaliation against inmates or staff who reported such an incident.</li> <li>3. Any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</li> </ol> <p data-bbox="240 880 1493 1005">Policy states any staff member who has knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment; retaliation against inmates or staff who reported such an incident; and any staff neglect that may have contributed to such incident or retaliation, shall immediately report such incident or retaliation, in the manner specified by the Wayne County Sheriff's Office policy.</p> <p data-bbox="240 1039 1481 1128">Employees shall immediately report to the youth center PREA Compliance Manager any knowledge, suspicion, or information they receive regarding the retaliation against youth or employees who have reported an incident of sexual abuse or sexual harassment.</p> <p data-bbox="240 1162 1474 1252">Employees shall immediately report to their supervisor and the department of human services any employee neglect or violation of responsibilities that may have contributed to a PREA allegation or to the retaliation against a reporter of a PREA allegation.</p> <p data-bbox="240 1285 1474 1411">Interviews with staff confirmed the requirement to report any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</p> <p data-bbox="240 1444 352 1467"><b>115.61 (b)</b></p> <p data-bbox="240 1476 1434 1570">PAQ: Apart from reporting to designated supervisors or officials and designated State or local service agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.</p> <p data-bbox="240 1603 1441 1659">Policy states apart from reporting to designated supervisors or officials, staff shall not reveal any information related to a sexual abuse report to anyone except as specified by the Wayne County Sheriff's Office policy.</p> <p data-bbox="240 1693 1457 1783">Staff interviewed were knowledgeable that policy prohibits them from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.</p> <p data-bbox="240 1816 352 1839"><b>115.61 (c)</b></p> <p data-bbox="240 1848 1482 1937">Policy states medical and mental health practitioners shall report knowledge, suspicion, or information regarding sexual abuse, sexual harassment, retaliation, or staff neglect pursuant to this section. This information shall be provided to inmates, in writing, at the initiation of services.</p> <p data-bbox="240 1948 1490 2038">Any person involved in an internal inquiry in any capacity is not authorized to discuss the incident, its facts, or particulars with anyone who has not been officially authorized by the appointing authority. Revealing information related to an inquiry may result in disciplinary action.</p> <p data-bbox="240 2072 1493 2128">An interview with the LPN confirmed she discloses the limitations of confidentiality and her duty to report, at the initiation of services to an inmate. She confirmed she is required to report any knowledge, suspicion, or information regarding an incident</p>

of sexual abuse or sexual harassment to the PREA Coordinator and Captain. She stated she reported a sexual harassment allegation to the PREA Coordinator upon becoming aware of the incident.

**115.61 (d)**

Policy states medical and mental health practitioners shall 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. If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, the Wayne County Sheriff's Office shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.

The Captain and PREA Coordinator stated when the jail does not accept persons under the age of 18.

**115.61 (e)**

Policy states when the Wayne County Sheriff's Office conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.

The Captain confirmed allegations of sexual abuse and sexual harassment, including third-party and anonymous reports are reported to the Wayne County Sheriff's Office PREA Investigator.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding staff and agency reporting duties. No corrective action is required.

115.62	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="240 306 376 333"><b>Documents:</b></p> <ol data-bbox="240 338 943 400" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 432 363 459"><b>Interviews:</b></p> <ol data-bbox="240 463 608 557" style="list-style-type: none"> <li>1. Agency Head Designee (Captain)</li> <li>2. Warden or Designee (Captain)</li> <li>3. Random Sample of Staff</li> </ol> <p data-bbox="240 589 347 616"><b>Findings:</b></p> <p data-bbox="240 620 1481 714">PAQ: When the agency or facility learns that an inmate is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the inmates (i.e., it takes some action to assess and implement appropriate protective measures without unreasonable delay).</p> <p data-bbox="240 745 1493 804">In the past 12 months: The number of times the agency or facility determined that an inmate was subject to substantial risk of imminent sexual abuse: 0</p> <p data-bbox="240 835 1481 898">Policy states when it is learned that an inmate is subject to substantial risk of imminent sexual abuse, immediate action shall be taken to protect the inmate.</p> <p data-bbox="240 929 1469 987">The Captain confirmed immediate actions will be taken to protect an inmate who is subject to a substantial risk of imminent sexual abuse. Protective measures would include making sure housing assignments are based on risk.</p> <p data-bbox="240 1019 376 1046"><b>Conclusion:</b></p> <p data-bbox="240 1050 1466 1108">Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding agency protection duties. No corrective action is required.</p>

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 1086 300"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="240 309 376 336"><b>Documents:</b></p> <ol data-bbox="240 340 943 400" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 432 363 459"><b>Interviews:</b></p> <ol data-bbox="240 463 608 524" style="list-style-type: none"> <li>1. Agency Head Designee (Captain)</li> <li>2. Warden or Designee (Captain)</li> </ol> <p data-bbox="240 555 507 582"><b>Findings (By Provision):</b></p> <p data-bbox="240 586 349 613"><b>115.63 (a)</b></p> <p data-bbox="240 618 1493 714">PAQ: The agency has a policy requiring that, upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred.</p> <p data-bbox="240 745 1458 806">In the past 12 months, the number of allegations the facility received that an inmate was abused while confined at another facility: 0</p> <p data-bbox="240 837 1493 934">Policy states upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred.</p> <p data-bbox="240 965 352 992"><b>115.63 (b)</b></p> <p data-bbox="240 996 1473 1057">PAQ: Agency policy requires that the facility head provides such notification as soon as possible, but no later than 72 hours after receiving the allegation.</p> <p data-bbox="240 1088 1485 1115">Policy states such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.</p> <p data-bbox="240 1146 352 1173"><b>115.63 (c)</b></p> <p data-bbox="240 1178 1425 1205">PAQ: The agency or facility documents that it has provided such notification within 72 hours of receiving the allegation.</p> <p data-bbox="240 1236 820 1263">Policy states the agency shall document such notification.</p> <p data-bbox="240 1294 352 1321"><b>115.63 (d)</b></p> <p data-bbox="240 1326 1453 1386">PAQ: Agency/facility policy requires that allegations received from other facilities/agencies are investigated in accordance with the PREA standards.</p> <p data-bbox="240 1417 1310 1444">In the past 12 months, the number of allegations of sexual abuse the facility received from other facilities: 0</p> <p data-bbox="240 1476 1489 1536">Policy states the facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards.</p> <p data-bbox="240 1568 1497 1628">The Captain confirmed when the facility receives an allegation from another facility or agency that an incident of sexual abuse or sexual harassment occurred in the facility, the allegation is referred for investigation.</p> <p data-bbox="240 1659 376 1686"><b>Conclusion:</b></p> <p data-bbox="240 1691 1466 1751">Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding reporting to other confinement facilities. No corrective action is required.</p>

115.64	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Staff Straining Records</li> <li>3. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Interviews:</b></p> <ol style="list-style-type: none"> <li>1. Staff First Responders</li> <li>2. Random Sample of Staff</li> <li>3. Inmates who Reported a Sexual Abuse - none</li> </ol> <p><b>Findings (By Provision):</b></p> <p><b>115.64 (a)</b></p> <p>PAQ: The agency has a first responder policy for allegations of sexual abuse.</p> <ol style="list-style-type: none"> <li>1. The policy requires that, upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report separate the alleged victim and abuser.</li> <li>2. The policy requires that, upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.</li> <li>3. The policy requires that, if the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report 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.</li> <li>4. The policy requires that, if the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report 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.</li> </ol> <p>In the past 12 months, the number of allegations that a inmates was sexually abused: 0</p> <p>Of these allegations:</p> <ol style="list-style-type: none"> <li>1. The number of times the first security staff member to respond to the report separated the alleged victim and abuser: 0</li> <li>2. The number of allegations where staff were notified within a time period that still allowed for the collection of physical evidence: 0</li> <li>3. The number of times the first security staff member to respond to the report preserved and protected any crime scene until appropriate steps could be taken to collect any evidence: 0</li> <li>4. The number of times the first security staff member to respond to the report requested 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: 0</li> <li>5. The number of times the first security staff member to respond to the report ensured 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: 0</li> </ol> <p>The facility shall develop a written plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership. Staff and First Responders:</p> <ol style="list-style-type: none"> <li>a. Separate the inmate from the alleged perpetrator;</li> <li>b. Preserve and protect any crime scene until appropriate steps can be taken to collect evidence; and</li> <li>c. If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim - and ensure that the alleged abuser - not take any actions that could destroy physical evidence, including washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and</li> </ol> <p>Staff were knowledgeable of their first responder duties if they are the first person to be alerted that an inmate has allegedly been the victim of sexual abuse.</p> <p><b>115.64 (b)</b></p> <p>PAQ: The agencies policy requires that if the first staff responder is not a security staff member, that responder shall be required to:</p> <ol style="list-style-type: none"> <li>1. Request that the alleged victim not take any actions that could destroy physical evidence.</li> </ol>



2. Notify security staff.

Of the allegations that an inmate was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder: 0

Policy states when the first staff responder is not a security staff member, they shall request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff.

The first responder interviewed confirmed they would request that the alleged victim not take any actions that could destroy physical evidence. Interviews revealed staff would not share sensitive information with other staff and inmates. Staff were knowledgeable of their first responder duties.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding staff first responder duties. No corrective action is required.

115.65	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1026 297">The following evidence was analyzed in making the compliance determination:</p> <p data-bbox="240 306 365 333">Documents:</p> <ol data-bbox="240 338 943 434" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. PREA Incident Checklist</li> <li>3. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 465 341 492">Interview:</p> <ol data-bbox="240 497 576 524" style="list-style-type: none"> <li>1. Warden or Designee (Captain)</li> </ol> <p data-bbox="240 555 336 582">Findings:</p> <p data-bbox="240 586 1461 649">PAQ: The facility has developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p data-bbox="240 680 1489 806">The auditor reviewed the PREA Incident Checklist and found it to be inclusive of the actions that would be taken if there were to be an incident of sexual abuse. The plan clearly defines the roles and responsibilities of each person involved and the procedures to be followed in detail. Roles addressed include the First Responder, Shift Supervisor, PREA Coordinator and the PREA investigator.</p> <p data-bbox="240 837 1445 900">The Captain confirmed the jail has a coordinated response plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, and facility leadership.</p> <p data-bbox="240 931 373 958"><b>Conclusion:</b></p> <p data-bbox="240 963 1466 1025">Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding a coordinated response to an incident of sexual abuse. No corrective action is required.</p>

115.66	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Interview:</b></p> <ol style="list-style-type: none"> <li>1. Agency Head Designee (Captain)</li> </ol> <p><b>Findings (By Provision):</b></p> <p><b>115.66 (a)</b></p> <p>PAQ: The agency, facility, or any other governmental entity responsible for collective bargaining on the agency's behalf has not entered into or renewed any collective bargaining agreement or other agreement since the last PREA audit.</p> <p>Policy states the Wayne County Sheriff's Office or any governmental entity responsible for collective bargaining on the Wayne County Sheriff's Office's behalf shall not enter into or renew any collective bargaining agreement or other agreement that limits the Wayne County Sheriff's Office's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or a determination of whether and to what extent discipline is warranted.</p> <p>The Captain confirmed the jail has not entered into or renewed any collective bargaining agreements.</p> <p><b>115.66 (b)</b></p> <p>Policy states nothing in this section shall restrict the Wayne County Sheriff's Office entering into or renewing agreements that govern:</p> <ol style="list-style-type: none"> <li>a. The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions in this policy relating to the standard of evidence for substantiating allegations of sexual abuse/harassment and disciplinary sanctions for staff.</li> <li>b. Whether a no-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated.</li> </ol> <p>The Captain confirmed the jail has not entered into or renewed any collective bargaining agreements.</p> <p><b>Conclusion:</b></p> <p>Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding the preservation of ability to protect inmates from contact with abusers. No corrective action is required.</p>

115.67	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Protections Against Retaliation Form</li> <li>3. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Document (Corrective Action):</b></p> <ol style="list-style-type: none"> <li>1. Protections Against Retaliation Statement (May 23, 2022)</li> <li>2. Protections Against Retaliation Example (May 20, 2022)</li> </ol> <p><b>Interviews:</b></p> <ol style="list-style-type: none"> <li>1. Agency Head Designee (Captain)</li> <li>2. Warden or Designee (Captain)</li> <li>3. Designated Staff Member Charged with Monitoring Retaliation</li> <li>4. Inmates who Reported a Sexual Abuse - none present</li> </ol> <p><b>Findings (By Provision):</b></p> <p><b>115.67 (a)</b></p> <p>PAQ: The agency has 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.</p> <p>The Agency designates staff member(s) or charges department(s) with monitoring for possible retaliation.  The name(s) of the staff member(s): Katy Lineberry  The title(s) of the staff member(s): PREA Coordinator</p> <p>Policy states the Wayne County Sheriff's Office's policy is 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.</p> <p><b>115.67 (b)</b></p> <p>The agency shall employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmates 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.</p> <p>Policy states the Wayne County Sheriff's Office shall 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.</p> <p>The interview with the Captain confirmed the agency protects inmates and staff from retaliation for sexual abuse or sexual harassment allegations through housing changes and transfers, removal of alleged abusers, emotional support services.</p> <p>The PREA Coordinator stated the role she plays in preventing retaliation against inmates and staff who report sexual abuse or sexual harassment, or against those who cooperate with sexual abuse or sexual harassment investigations includes making requests for transfers, acting as the liaison between the inmate and the Center of Hope for counseling, and completing the retaliation monitoring form. The different measures she takes to protect those inmates and staff from retaliation include interviews and monitoring performance. She confirmed initiates contact with inmates who have reported sexual abuse as soon as its discovered and then every 30 says for 3 months.</p> <p><b>115.67 (c)</b></p> <p>PAQ: The agency and/or facility monitors the conduct or treatment of inmates or staff who reported sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation by inmates or staff.</p> <p>The length of time that the agency and/or facility monitors the conduct or treatment: 90 days</p> <p>The agency/facility acts promptly to remedy any such retaliation. The agency/facility continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.</p> <p>The number of times an incident of retaliation occurred in the past 12 months: 0</p>

Policy states for at least 90 days following a report of sexual abuse, the Wayne County Sheriff's Office shall monitor the conduct and treatment of inmates or staff who reported sexual abuse, and 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, and shall act promptly to remedy any such retaliation. The 115.67 Protections Against Retaliation form will document measures taken to protect staff and inmates from retaliation.

The Wayne County Sheriff's Office shall continue such monitoring beyond 90 days if the initial monitoring indicates an ongoing need. Monitoring shall include:

- a. Periodic in-person conversations with inmates and/or staff;
- b. Review of disciplinary incidents involving inmates;
- c. Review of housing or program changes; and
- d. Review of negative performance reviews or reassignments of staff.

The Captain stated measures he would take when he suspects retaliation would be take measures to protect the victim and investigate the allegation.

The PREA Coordinator stated things she looks for to detect possible retaliation includes inmate disciplinary reports and requests to change pods for inmates and negative performance reviews or reassignments of staff. She stated she would monitor the conduct and treatment of inmates and staff who report the sexual abuse of a inmates or were reported to have suffered sexual abuse for 90 days, but longer if necessary.

**115.67 (d)**

Policy states monitoring shall include periodic in-person conversations with inmates.

The PREA Coordinator stated monitoring would include status checks every 30 days.

**115.67 (e)**

Policy states the Wayne County Sheriff's Office's policy is to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff.

The Captain confirmed the agency protects an individual who cooperates with an investigation if they express a fear of retaliation. The agency shall take appropriate measures to protect that individual against retaliation.

**Conclusion and Corrective Action:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding agency protection against retaliation. Corrective action is complete.

**115.67 (d) and (e)**

The PREA Coordinator provided a signed and dated statement indicating procedures to ensure compliance with the standard (May 23, 2022). Additionally, the Protections Against Retaliation Form and an example were provided May 20, 2022.

115.68	<b>Post-allegation protective custody</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1086 300"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="242 306 376 331"><b>Documents:</b></p> <ol data-bbox="242 338 943 400" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="242 432 352 456"><b>Interview:</b></p> <ol data-bbox="242 463 576 492" style="list-style-type: none"> <li>1. Warden or Designee (Captain)</li> </ol> <p data-bbox="242 521 347 546"><b>Findings:</b></p> <p data-bbox="242 553 1477 647">PAQ: The agency has a policy prohibiting the placement of inmates who allege to have suffered sexual abuse in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been made that there is no available alternative means of separation from likely abusers.</p> <p data-bbox="242 678 1453 741">The number of inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment: 0</p> <p data-bbox="242 770 1458 833">In the past 12 months, the number of inmates who allege to have suffered sexual abuse who were assigned to involuntary segregated housing for longer than 30 days while awaiting alternative placement: 0</p> <p data-bbox="242 862 1453 925">From a review of case files of inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months, the number of case files that include BOTH:</p> <ul data-bbox="242 931 1126 994" style="list-style-type: none"> <li>• A statement of the basis for facility's concern for the inmate's safety; and</li> <li>• The reason or reasons why alternative means of separation could not be arranged: N/A</li> </ul> <p data-bbox="242 1023 1445 1086">If an involuntary segregated housing assignment is made, the facility affords each such inmate a review every 30 days to determine whether there is a continuing need for separation from the general population.</p> <p data-bbox="242 1115 1474 1178">WCSO policy states any use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse shall be subject to the requirements of standard 115.43.</p> <p data-bbox="242 1207 1485 1397">The Captain confirmed agency policy prohibits placing inmates at high risk for sexual victimization or who have alleged sexual abuse in involuntary segregated housing in lieu of other housing areas, unless an assessment has determined there are no available alternative means of separation from potential abusers. Inmates at high risk for sexual victimization or who have alleged sexual abuse placed in involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged. There have been no circumstances in which segregated housing was used to protect an inmate who was alleged to have suffered sexual abuse within the past 12 months.</p> <p data-bbox="242 1426 1490 1686">The PREA Coordinator confirmed when inmates are placed in segregated housing for protection from sexual abuse or after having alleged sexual abuse, they still have access to programs, privileges, education, and work opportunities (to the extent possible). If the facility restricts access to programs, privileges, education, or work opportunities, the facility documents and opportunities that have been limited, the duration of the limitations, and the reasons for such limitations. Inmates are placed in involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged. Once an inmate is assigned to involuntary segregated housing, the facility reviews the inmate's circumstances every 30 days to determine if continued placement in involuntary segregated housing is needed. She stated there has not been any involuntary segregated housing within the past 12 months.</p> <p data-bbox="242 1715 376 1740"><b>Conclusion:</b></p> <p data-bbox="242 1747 1465 1809">Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding post-allegation protective custody. No corrective action is required</p>

115.71	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p>Documents (Corrective Action):</p> <ol style="list-style-type: none"> <li>1. Special Investigator Receipt of PREA (May 26, 2022)</li> <li>2. Specialized Training Topics – pending (May 23, 2022)</li> </ol> <p><b>Interviews:</b></p> <ol style="list-style-type: none"> <li>1. Warden or Designee (Captain)</li> <li>2. PREA Coordinator</li> <li>3. Investigative Staff</li> <li>4. Inmates who Reported a Sexual Abuse - none</li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.71 (a)</b></p> <p>PAQ: The agency/facility has a policy related to criminal and administrative agency investigations.</p> <p>Policy (page 21, section O) states the Wayne County Sheriff's Office shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. It is the Wayne County Sheriff's Office's policy to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The Wayne County Sheriff's Office shall document all such referrals. The Wayne County Sheriff's Office shall publish this policy on its website at <a href="http://www.waynetnso.com">www.waynetnso.com</a>.</p> <p>The investigative staff confirmed he quickly initiates an investigation following an allegation of sexual abuse or sexual harassment. The length of time depends on the severity of the allegation. Anonymous or third-party reports of sexual abuse or sexual harassment are they investigated no differently. The auditor reviewed three investigative reports for allegations of sexual abuse.</p> <p><b>115.71 (b)</b></p> <p>Policy (page 21, section O) states where sexual abuse is alleged, the Wayne County Sheriff's Office shall use investigators who have received special training in sexual abuse investigations.</p> <p>The investigative staff confirmed he received training specific to conducting sexual abuse and sexual harassment investigations in confinement settings. He stated he received the training required by §115.31 and completed NIC specialized training topics.</p> <p>The auditor has requested documentation of training to verify compliance with the training requirements.</p> <p><b>115.71 (c)</b></p> <p>Policy (page 21, section O) states investigators shall:</p> <ol style="list-style-type: none"> <li>a. Gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data;</li> <li>b. Interview alleged victims, suspected perpetrators, and witnesses; and</li> <li>c. Review prior complaints and reports of sexual abuse involving the suspected perpetrator.</li> </ol> <p>The investigative staff confirmed the first steps in initiating an investigation are getting statements and getting an outline of what happened. The auditor reviewed three investigative reports for allegations of sexual abuse.</p> <p><b>115.71 (d)</b></p> <p>Policy (page 22, section O) states when the quality of evidence appears to support criminal prosecution, the Wayne County Sheriff's Office shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.</p> <p>The investigative staff confirmed when he discovers evidence that a prosecutable crime may have taken place, he consults with prosecutors before conducting compelled interviews. The auditor reviewed three investigative reports for allegations of sexual abuse.</p>

**115.71 (e)**

Policy (page 22, section O) states the credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as inmate or staff. The Wayne County Sheriff's Office shall not require an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with an investigation.

The investigative staff confirmed he basis the credibility of an alleged victim, suspect, or witness on an individual basis and not based on the person's status as inmate or staff. Everything is taken into consideration. He stated under no circumstances would he require an inmate who alleges sexual abuse to submit to a polygraph examination or truth-telling device as a condition for proceeding with an investigation.

**115.71 (f)**

Policy (page 22, section O) states administrative Investigations:

- a. Shall include an effort to determine whether staff actions or failures to act contributed to the abuse; and
- b. Shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

The investigative staff stated he looks at employee performance during an administrative investigation to determine whether staff actions or failures to act contributed to the sexual abuse. He confirmed he documents administrative investigations in written reports.

The auditor reviewed three investigative reports for allegations of sexual abuse. None of the cases involved substantiated allegations that they were referred for prosecution.

**115.71 (g)**

Policy (page 22, section O) states criminal Investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible.

The investigative staff stated criminal investigations are documented. The reports contain thorough descriptions of physical, testimonial, and documentary evidence, as well as attached copies of documentary evidence.

**115.71 (h)**

PAQ: Substantiated allegations of conduct that appear to be criminal are referred for prosecution. The number of substantiated allegations of conduct that appear to be criminal that were referred for prosecution since the last PREA: 0

The investigative staff stated he refers cases for prosecution when there are substantiated allegations of conduct that appear to be criminal.

**115.71 (i)**

PAQ: The agency retains all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

Policy (page 22, section O) states the Wayne County Sheriff's Office shall retain all written reports required by this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

**115.71 (j)**

Policy (page 22, section O) states the departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation.

The investigative staff stated when a staff member alleged to have committed sexual abuse terminates employment prior to a completed investigation into his/her conduct the investigation would continue.

**115.71 (l)**

Policy (page 22, section O) states when other agencies investigate sexual abuse, the Wayne County Sheriff's Office shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.

The Captain and PREA Coordinator confirmed when outside agencies investigate sexual abuse, the facility shall cooperate with outside investigators. Both stated the PREA Coordinator would remain informed about the progress of the investigation. The investigative staff stated when an outside agency investigates an incident of sexual abuse in the facility he would assist as needed.

**Conclusion and Corrective Action:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding criminal and administrative agency investigations. Corrective action is complete.

**115.71 (b)**



NIC certificates for the three special investigators was provided May 23, 2022. Documentation of the annual training for the three investigators, required by §115.31 was provided May 26, 2022.

115.72	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Interview:</b></p> <ol style="list-style-type: none"> <li>1. Investigative Staff</li> </ol> <p><b>Findings:</b></p> <p>PAQ: The agency imposes a standard of a preponderance of the evidence or a lower standard of proof when determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>Policy (page 22, section O) states the Wayne County Sheriff's Office shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated in administrative investigations.</p> <p>The investigative staff stated confirmed this policy.</p> <p><b>Conclusion:</b></p> <p>Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding evidentiary standard for administrative investigations. No corrective action is required.</p>

115.73	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="240 306 376 333"><b>Documents:</b></p> <ol data-bbox="240 338 943 434" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Inmate Notification of Investigative Outcome Form</li> <li>3. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 463 363 490"><b>Interviews:</b></p> <ol data-bbox="240 495 732 591" style="list-style-type: none"> <li>1. Warden or Designee (Captain)</li> <li>2. Investigative Staff</li> <li>3. Inmates who Reported a Sexual Abuse - none</li> </ol> <p data-bbox="240 620 501 647"><b>Findings (by provision):</b></p> <p data-bbox="240 651 352 678"><b>115.73 (a)</b></p> <p data-bbox="240 683 1473 779">PAQ: The agency has a policy requiring that any inmate who makes an allegation that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency.</p> <p data-bbox="240 808 469 835">In the past 12 months:</p> <ol data-bbox="240 840 1485 972" style="list-style-type: none"> <li>1. The number of criminal and/or administrative investigations of alleged inmates sexual abuse that were completed by the agency/facility: 3</li> <li>2. Of the investigations that were completed of alleged sexual abuse, the number of inmates who were notified, verbally or in writing, of the results of the investigation: 1</li> </ol> <p data-bbox="240 1001 1484 1128">Policy (page 23, section Q) states following an investigation into an inmate's allegation that he or she suffered sexual abuse, the Wayne County Sheriff's Office shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. If the Wayne County Sheriff's Office did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the inmate.</p> <p data-bbox="240 1158 1474 1254">The Captain and Investigator confirmed that when an inmate makes an allegation of sexual abuse, the inmate must be informed as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation.</p> <p data-bbox="240 1283 352 1310"><b>115.73 (b)</b></p> <p data-bbox="240 1314 1458 1377">PAQ: If an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity in order to inform the inmate of the outcome of the investigation.</p> <p data-bbox="240 1406 469 1433">In the past 12 months:</p> <ol data-bbox="240 1438 1477 1534" style="list-style-type: none"> <li>1. The number of investigations of alleged inmates sexual abuse in the facility that were completed by an outside agency: 2</li> <li>2. Of the outside agency investigations of alleged sexual abuse that were completed, the number of inmates alleging sexual abuse in the facility who were notified verbally or in writing of the results of the investigation: 1</li> </ol> <p data-bbox="240 1563 1473 1626">Policy (page 23, section Q) states if the Wayne County Sheriff's Office did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the inmate.</p> <p data-bbox="240 1655 1457 1718">The auditor reviewed three investigative reports for allegations of sexual abuse. One allegation required notification of the outcome of the investigation. The notification was made with the Inmate Notification of Investigative Outcome Form.</p> <p data-bbox="240 1747 352 1774"><b>115.73 (c)</b></p> <p data-bbox="240 1778 1484 1874">PAQ: Following an inmate's allegation that a staff member has committed sexual abuse against the inmates, the agency/facility subsequently informs the inmates (unless the agency/facility has determined that the allegation is unfounded) whenever:</p> <ol data-bbox="240 1879 1425 2011" style="list-style-type: none"> <li>1. The staff member is no longer posted within the inmate's unit;</li> <li>2. The staff member is no longer employed at the facility;</li> <li>3. The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or</li> <li>4. The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.</li> </ol> <p data-bbox="240 2040 1477 2103">There has not been a substantiated or unsubstantiated complaint (i.e., not unfounded) of sexual abuse committed by a staff member against an inmates in the past 12 months.</p> <p data-bbox="240 2132 1498 2159">Policy (page 23, section Q) states following an inmate's allegation that a staff member committed sexual abuse against him or</p>

her, the Wayne County Sheriff's Office shall subsequently inform the inmate whenever:

1. The staff member is no longer posted within the inmate's unit;
2. The staff member is no longer employed at the facility;
3. The Wayne County Sheriff's Office learns that the staff member has been charged with or indicted on a charge related to sexual abuse within the facility; or
4. The Wayne County Sheriff's Office learns that the staff member has been convicted on a charge related to sexual abuse within the facility.

The auditor observed the Inmate Notification of Investigative Outcome Form is inclusive of the standard provision requirements.

**115.73 (d)**

PAQ: Following an inmate's allegation that he or she has been sexually abused by another inmate in an agency facility, the agency subsequently informs the alleged victim whenever:

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

Policy (page 23, section Q) states following an inmate's allegation that he or she has been sexually abused by another inmate, the Wayne County Sheriff's Office shall subsequently inform the alleged victim whenever:

1. The Wayne County Sheriff's Office learns that the alleged abuser has been charged with or indicted on a charge related to sexual abuse within the facility; or
2. The Wayne County Sheriff's Office learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

The auditor observed the Inmate Notification of Investigative Outcome Form is inclusive of the standard provision requirements.

**115.73 (e)**

PAQ: The agency has a policy that all notifications to inmates described under this standard are documented.

In the past 12 months:

1. The number of notifications to inmates that were made pursuant to this standard: 1
2. The number of those notifications that were documented: 1

Policy (page 24, section Q) states all such notifications or attempted notifications shall be documented. The 115.73 Inmate Notification of Investigative Outcome form will be completed and serve as the notification required for each investigative outcome.

One allegation required notification of the outcome of the investigation. The notification was made with the Inmate Notification of Investigative Outcome Form.

**115.73 (f)**

Policy (page 24, section Q) states the Wayne County Sheriff's Office's obligation to report as outlined in this section shall terminate if the inmate is released from the agency's custody.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding reporting to inmates. No corrective action is required.

<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.76 (a)</b>  PAQ: Staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.</p> <p>Policy (page 24, section R) states staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.</p> <p><b>115.76 (b)</b>  In the past 12 months:</p> <ol style="list-style-type: none"> <li>1. The number of staff from the facility that have violated agency sexual abuse or sexual harassment policies: 1</li> <li>2. The number of those staff from the facility that have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies: 1</li> </ol> <p>Policy (page 24, section R) states termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.</p> <p><b>115.76 (c)</b>  PAQ: Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are 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.</p> <p>In the past 12 months, the number of staff from the facility that have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies: 0</p> <p>Policy (page 24, section R) states disciplinary sanctions for violations of the Wayne County Sheriff's Office policies relating to sexual abuse or sexual harassment shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.</p> <p><b>115.76 (d)</b>  PAQ: 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, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.</p> <p>In the past 12 months, the number of staff from the facility that have been reported to law enforcement or licensing boards following their termination (or resignation prior to termination) for violating agency sexual abuse or sexual harassment policies: 0</p> <p>Policy (page 24, section R) states 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, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.</p> <p><b>Conclusion:</b>  Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding disciplinary sanctions for staff. No corrective action is required.</p>

115.77	<b>Corrective action for contractors and volunteers</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1086 300"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="242 306 376 331"><b>Documents:</b></p> <ol data-bbox="242 338 943 400" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="242 432 352 456"><b>Interview:</b></p> <ol data-bbox="242 463 576 492" style="list-style-type: none"> <li>1. Warden or Designee (Captain)</li> </ol> <p data-bbox="242 521 501 548"><b>Findings (by provision):</b></p> <p data-bbox="242 555 349 582"><b>115.77 (a)</b></p> <p data-bbox="242 589 1473 680">PAQ: Agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. Agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with inmates.</p> <p data-bbox="242 712 1473 775">In the past 12 months, no contractors or volunteers have been reported to law enforcement agencies and relevant licensing bodies for engaging in sexual abuse of inmates.</p> <p data-bbox="242 801 1473 896">Policy (page 25, section R) states any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with inmates and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.</p> <p data-bbox="242 927 349 954"><b>115.77 (b)</b></p> <p data-bbox="242 960 1473 1023">PAQ: The facility takes appropriate remedial measures and considers whether to prohibit further contact with inmates in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p data-bbox="242 1055 1489 1146">Policy (page 25, section R) states the facility shall take appropriate remedial measures and shall consider whether to prohibit further contact with inmates, in the case of any other violation of the Wayne County Sheriff's Office sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p data-bbox="242 1178 1473 1240">The Captain stated actions the facility would take in the case of any violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer would include an investigation to determine of formal charges need to be pursued.</p> <p data-bbox="242 1272 376 1296"><b>Conclusion:</b></p> <p data-bbox="242 1303 1473 1364">Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding corrective action for contractors and volunteers. No corrective action is required.</p>

115.78	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="242 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="242 306 376 333"><b>Documents:</b></p> <ol data-bbox="242 338 943 400" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="242 432 363 459"><b>Interviews:</b></p> <ol data-bbox="242 463 576 490" style="list-style-type: none"> <li>1. Warden or Designee (Captain)</li> </ol> <p data-bbox="242 521 501 548"><b>Findings (by provision):</b></p> <p data-bbox="242 553 349 580"><b>115.78 (a)</b></p> <p data-bbox="242 584 1481 680">PAQ: Inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that the inmates engaged in inmates-on-inmates sexual abuse. Inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for inmates-on-inmates sexual abuse.</p> <p data-bbox="242 712 469 739">In the past 12 months:</p> <ol data-bbox="242 743 1361 806" style="list-style-type: none"> <li>1. The number of administrative findings of inmate-on-inmate sexual abuse that have occurred at the facility: 0</li> <li>2. The number of criminal findings of guilt for inmate-on-inmate sexual abuse that have occurred at the facility: 0</li> </ol> <p data-bbox="242 837 1458 900">Policy (page 24, section R) states all inmates found guilty of sexual abuse shall be institutionally disciplined in accordance with the facility disciplinary procedures.</p> <p data-bbox="242 931 349 958"><b>115.78 (b)</b></p> <p data-bbox="242 963 1493 1059">Policy (page 24, section R) states sanctions shall be 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.</p> <p data-bbox="242 1090 1490 1214">The Captain stated disciplinary sanctions inmates are subject to following an administrative or criminal finding that the inmate engaged in inmate-on-inmate sexual abuse may include reclassification and possibly loss of their privileges. Sanctions are proportionate to the nature and circumstances of the abuses committed, the inmates' disciplinary histories, and the sanctions imposed for similar offenses by other inmates with similar histories.</p> <p data-bbox="242 1245 349 1272"><b>115.78 (c)</b></p> <p data-bbox="242 1276 1441 1339">Policy (page 24, section R) states the disciplinary process shall consider whether an inmate's mental disability or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.</p> <p data-bbox="242 1370 1201 1397">The Captain stated mental disability or mental illness is considered when determining sanctions.</p> <p data-bbox="242 1429 349 1456"><b>115.78 (d)</b></p> <p data-bbox="242 1460 1490 1621">PAQ: The facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. If the facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse, the facility considers whether to require the offending inmate to participate in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives. Access to general programming or education is not conditional on participation in such interventions.</p> <p data-bbox="242 1653 1477 1749">Policy (page 24, section R) states if the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.</p> <p data-bbox="242 1780 1192 1807">The LPN confirmed inmates have the right to refuse therapy, counseling, or other interventions.</p> <p data-bbox="242 1839 349 1865"><b>115.78 (e)</b></p> <p data-bbox="242 1870 1477 1933">PAQ: The agency disciplines inmates for sexual contact with staff only upon finding that the staff member did not consent to such contact.</p> <p data-bbox="242 1964 1473 2027">Policy (page 24, section R) states an inmate may be disciplined for sexual conduct with an employee only upon finding that the employee did not consent to such contact.</p> <p data-bbox="242 2058 349 2085"><b>115.78 (f)</b></p> <p data-bbox="242 2089 1493 2148">PAQ: The agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the</p>

allegation.

Policy (page 24, section R) states inmates who deliberately allege false claims of sexual abuse can be disciplined.

**115.78 (g)**

PAQ: The agency prohibits all sexual activity between inmates. The agency deems such activity to constitute sexual abuse only if it determines that the activity is coerced.

Policy (page 1) states sexual activity between inmates, or employees/contractors/volunteers and inmates, regardless of consensual status, is strictly prohibited and subject to administrative and criminal disciplinary sanctions.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding interventions and disciplinary sanctions for inmates. No corrective action is required.



115.81	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Documents (Corrective Action):</b></p> <p>Inmate Interview and Documentation Review Updated (May 13, 2022)</p> <p>Inmate Interview and Documentation Review Sample (May 23, 2022)</p> <p><b>Interviews:</b></p> <ol style="list-style-type: none"> <li>1. Staff Responsible for Risk Screening</li> <li>2. Medical and Mental Health Staff</li> <li>3. Inmates who Disclose Sexual Victimization at Risk Screening</li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.81 (a) and (c)</b></p> <p>PAQ: All inmates at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.341 have not been offered a follow-up meeting with a medical or mental health practitioner. The follow-up meetings were not offered within 14 days of the intake screening. Medical and mental health staff maintain secondary materials (e.g., form, log) documenting compliance with the above required services.</p> <p>In the past 12 months, the number of inmates who disclosed prior victimization during screening who were offered a follow up meeting with a medical or mental health practitioner: 0%</p> <p>Policy (page 12, section E) states inmates identified during the intake screening as high risk for sexual victimization with a history of prior sexual victimization whether it occurred in an institutional setting or the community are assessed by mental health or other qualified professional within fourteen (14) days of the intake screening. Inmates at risk for sexual victimization will be identified, monitored, and counseled.</p> <p>Five inmates was identified as reporting prior sexual victimization during risk screening. Two inmates reported receiving a follow-up meeting within 2 weeks. Two inmates stated they were not offered follow-up meetings and they would have accepted the opportunity for a follow-up meeting. One inmate says she was offered a follow-up meeting but declined.</p> <p>The auditor requested documentation to verify the meetings are being offered as required by the standard.</p> <p><b>115.81 (b)</b></p> <p>N/A; The facility is not a prison.</p> <p><b>115.81 (d)</b></p> <p>PAQ: Information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners.</p> <p>Policy (page 6, section A) states apart from reporting to designated supervisors or officials, staff shall not reveal any information related to a sexual abuse report to anyone except as specified by the Wayne County Sheriff's Office policy. This information should never be shared with other inmates.</p> <p>The auditor observed that information is securely retained.</p> <p><b>115.81 (e)</b></p> <p>PAQ: 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 inmates is under the age of 18.</p> <p>Policy (page 18, section L) states medical and mental health practitioners shall 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.</p> <p>If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, the Wayne County Sheriff's Office shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.</p> <p>An interview with the LPN confirmed informed consent is required from inmates before reporting about prior sexual</p>

victimization that did not occur in an institutional setting. She confirmed informed consent from inmates is required for inmates 18 and older. The jail doesn't house minors.

**Conclusion and Corrective Action:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding medical and mental health screenings; history of sexual abuse. Corrective action is complete.

**115.81 (a)**

The Inmate Interview and Documentation Review was updated to document the 14 day follow up meetings (May 13, 2022). An example of the Inmate Interview and Documentation Review was provided (May 23, 2022) to show the procedure is in practice.

115.82	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="240 306 376 333"><b>Documents:</b></p> <ol data-bbox="240 338 943 434" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. PREA Brochure: What You Need to Know</li> <li>3. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 463 363 490"><b>Interviews:</b></p> <ol data-bbox="240 495 815 591" style="list-style-type: none"> <li>1. Medical and Mental Health Practitioners</li> <li>2. Inmates who Reported a Sexual Abuse</li> <li>3. Security Staff and Non-Security Staff First Responders</li> </ol> <p data-bbox="240 620 528 647"><b>Site Review Observations:</b></p> <p data-bbox="240 651 754 678">Observations during onsite review of physical plant</p> <p data-bbox="240 707 501 734"><b>Findings (by provision):</b></p> <p data-bbox="240 743 349 770"><b>115.82 (a)</b></p> <p data-bbox="240 775 1481 1005">PAQ: Inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment. Medical and mental health practitioners maintain secondary materials (e.g., form, log) documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services concerning contraception and sexually transmitted infection prophylaxis.</p> <p data-bbox="240 1034 1442 1131">Policy (page 19, section M) states inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment.</p> <p data-bbox="240 1160 1489 1220">Wayne County Jail provides resident victims of sexual abuse timely, unimpeded access to emergency medical treatment and crisis intervention services through local hospitals for medical treatment and Mobile Crisis for crisis intervention.</p> <p data-bbox="240 1249 1469 1346">The LPN stated inmate victims of sexual abuse receive timely and unimpeded access to emergency medical treatment and crisis intervention services according to policy guidelines. The nature and scope of these services is not determined according to their professional judgment. She stated there is a sexual assault specialist at Wayne medical Center.</p> <p data-bbox="240 1375 352 1402"><b>115.82 (b)</b></p> <p data-bbox="240 1406 1445 1503">Policy (page 19, section M) states if no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall immediately notify the appropriate medical and mental health practitioners.</p> <p data-bbox="240 1532 1474 1592">Staff were knowledgeable of their first responder duties if they are the first person to be alerted that an inmate has allegedly been the victim of sexual abuse.</p> <p data-bbox="240 1621 352 1648"><b>115.82 (c)</b></p> <p data-bbox="240 1653 1492 1883">PAQ: Inmate victims of sexual abuse while incarcerated are 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. Medical and mental health practitioners maintain secondary materials documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and 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.</p> <p data-bbox="240 1912 1493 2009">Policy (page 19, section M) states inmate victims of sexual abuse while incarcerated shall be 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.</p> <p data-bbox="240 2038 1445 2098">The LPN confirmed victims of sexual abuse are offered timely information about access to emergency contraception and sexually transmitted infection prophylaxis.</p> <p data-bbox="240 2128 352 2154"><b>115.82 (d)</b></p>

PAQ: Treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Policy (page 19, section M) states treatment services shall be provided to the victim - without financial cost to the victim - and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

The auditor observed inmates are informed of treatment services are provided to every victim without financial cost in the PREA Brochure: What You Need to Know.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the agency and facility is fully compliant with this standard regarding access to emergency medical and mental health services. No corrective action is required.

115.83	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="240 306 376 333"><b>Documents:</b></p> <ol data-bbox="240 338 943 434" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. PREA Brochure: What You Need to Know</li> <li>3. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 463 363 490"><b>Interviews:</b></p> <ol data-bbox="240 495 730 557" style="list-style-type: none"> <li>1. Medical and Mental Health Staff</li> <li>2. Inmates who Reported a Sexual Abuse - none</li> </ol> <p data-bbox="240 586 528 613"><b>Site Review Observations:</b></p> <p data-bbox="240 618 762 645">Observations during on-site review of physical plant</p> <p data-bbox="240 674 501 701"><b>Findings (by provision):</b></p> <p data-bbox="240 705 349 732"><b>115.83 (a)</b></p> <p data-bbox="240 741 1461 804">PAQ: The facility offers 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.</p> <p data-bbox="240 833 1484 929">Policy (page 20, section M) states the facility shall offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been sexually abused in a prison, jail, lockup, community corrections facility, or juvenile justice facility.</p> <p data-bbox="240 958 1484 1021">The auditor observed medical facilities during the site review. Additionally, services are available at Maury Regional Medical Center.</p> <p data-bbox="240 1050 349 1077"><b>115.83 (b)</b></p> <p data-bbox="240 1081 1474 1178">Policy (page 20, section M) states the evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.</p> <p data-bbox="240 1207 1430 1303">The LPN interviewed confirmed evaluation and treatment of inmates who have been victimized would include follow-up medical and mental health services and referrals when needed. She confirmed victims are given timely information and access to all lawful pregnancy-related services if pregnancy results from sexual abuse while incarcerated.</p> <p data-bbox="240 1332 349 1359"><b>115.83 (c)</b></p> <p data-bbox="240 1364 1466 1426">Policy (page 20, section M) states the facility shall provide such victims with medical and mental health services consistent with the community level of care.</p> <p data-bbox="240 1456 349 1482"><b>115.83 (d)</b></p> <p data-bbox="240 1487 1323 1514">PAQ: Female victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests.</p> <p data-bbox="240 1543 1474 1606">Policy (page 20, section M) states inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests, as medically necessary.</p> <p data-bbox="240 1635 1442 1697">The LPN confirmed inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. Additionally, Maury Regional Medical Center personnel provide information and treatment for possible pregnancy.</p> <p data-bbox="240 1727 349 1753"><b>115.83 (e)</b></p> <p data-bbox="240 1758 1426 1821">PAQ: If pregnancy results from sexual abuse while incarcerated, victims receive timely and comprehensive information about, and timely access to, all lawful pregnancy-related medical services.</p> <p data-bbox="240 1850 1484 1946">Policy (page 20, section M) states if pregnancy results from the conduct described in this section, victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services, such as prenatal care and access to pregnancy termination services, where available.</p> <p data-bbox="240 1975 1493 2072">Maury Regional Medical Center medical personnel provide information and treatment for possible pregnancy. The medical staff confirmed victims of sexual abuse would be offered timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.</p> <p data-bbox="240 2101 349 2128"><b>115.83 (f)</b></p> <p data-bbox="240 2132 1442 2159">PAQ: Inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically</p>

appropriate.

Policy (page 20, section M) states inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections, as medically appropriate.

Maury Regional Medical Center medical personnel provide information and treatment for sexually transmitted infections and possible pregnancy. The RN confirmed victims of sexual abuse shall be offered tests for sexually transmitted infections as medically appropriate.

**115.83 (g)**

PAQ: Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Policy (page 20, section M) states ongoing treatment services shall be provided to the victim without financial cost to the victim and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

The PREA Brochure: What You Need to Know informs the inmates all victim support services, access to community advocates and forensic medical treatment are provided at no cost.

**115.83 (h)**

N/A; The facility is a jail.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding ongoing medical and mental health care for sexual abuse victims and abusers. No corrective action is required.

115.86	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="240 306 376 329"><b>Documents:</b></p> <ol data-bbox="240 338 943 434" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Sexual Abuse Critical Incident Review Form</li> <li>3. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="240 463 363 486"><b>Interviews:</b></p> <ol data-bbox="240 495 576 591" style="list-style-type: none"> <li>1. Warden or Designee (Captain)</li> <li>2. PREA Coordinator</li> <li>3. Incident Review Team</li> </ol> <p data-bbox="240 620 501 647"><b>Findings (by provision):</b></p> <p data-bbox="240 656 349 683"><b>115.86 (a)</b></p> <p data-bbox="240 692 1477 748">PAQ: The facility conducts a sexual abuse incident review at the conclusion of every sexual abuse criminal or administrative investigation unless the allegation has been determined to be unfounded.</p> <p data-bbox="240 777 1469 837">In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility, excluding only "unfounded" incidents: 0</p> <p data-bbox="240 866 695 893">All sexual abuse allegations were unfounded.</p> <p data-bbox="240 922 1437 983">Policy (page 20, section N) states the Wayne County Sheriff's Office shall conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, unless the allegation has been determined to be unfounded.</p> <p data-bbox="240 1012 349 1039"><b>115.86 (b)</b></p> <p data-bbox="240 1048 1417 1108">PAQ: The facility ordinarily conducts a sexual abuse incident review within 30 days of the conclusion of the criminal or administrative sexual abuse investigation.</p> <p data-bbox="240 1137 1469 1198">In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents: 0</p> <p data-bbox="240 1227 695 1254">All sexual abuse allegations were unfounded.</p> <p data-bbox="240 1283 1425 1310">Policy (page 20, section N) states the review shall ordinarily occur within 30 days of the conclusion of the investigation.</p> <p data-bbox="240 1339 349 1366"><b>115.86 (c)</b></p> <p data-bbox="240 1375 1414 1435">PAQ: The sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners.</p> <p data-bbox="240 1464 1414 1525">Policy (page 20, section N) states the review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.</p> <p data-bbox="240 1554 1437 1650">The Captain confirmed the facility has a sexual abuse incident review team; the team includes upper-level management officials and allows for input from line supervisors, investigators, and medical staff. Information is used to make improvements as needed.</p> <p data-bbox="240 1680 349 1706"><b>115.86 (d)</b></p> <p data-bbox="240 1715 1477 1812">PAQ: The facility prepares a report of its findings from sexual abuse incident reviews, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section, and any recommendations for improvement and submits such report to the facility head and PREA Coordinator.</p> <p data-bbox="240 1841 847 1868">Policy (pages 20-21, section N) states the review team shall:</p> <ol data-bbox="240 1877 1469 2136" style="list-style-type: none"> <li>a. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;</li> <li>b. Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility;</li> <li>c. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;</li> <li>d. Assess the adequacy of staffing levels in that area during different shifts;</li> </ol>

- e. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and
- f. Prepare a report of its findings, including determinations made pursuant to this section, and any recommendations for improvement and submit the report to the facility head and the agency PREA Coordinator.

The 115.86 Sexual Abuse Critical Incident Review form will be completed and follow the criteria stated in this policy.

PREA Coordinator was interviewed as a member of the sexual abuse incident review team. She confirmed the team considers 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 was motivated or otherwise caused by other group dynamics at the facility. The area in the facility where the incident allegedly occurred is examined to assess whether physical barriers in the area may enable abuse. Adequacy of staffing levels in the area is assessed for different shifts. She confirmed the team assesses whether monitoring technology should be deployed or augmented to supplement supervision by staff.

**115.86 (e)**

PAQ: The facility implements the recommendations for improvement or documents its reasons for not doing so.

Policy (page 21, section N) states the Wayne County Sheriff's Office shall implement the review team's recommendations for improvement or document its reasons for not doing so.

**Conclusion:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding sexual abuse incident reviews. No corrective action is required.



115.87	<b>Data collection</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <p><b>Documents:</b></p> <ol style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. Survey of Sexual Victimization Substantiated Incident Form (Adult)</li> <li>3. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p><b>Document (Corrective Action):</b></p> <ol style="list-style-type: none"> <li>1. 2021 Annual Report (June 3, 2022)</li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.87 (a)</b></p> <p>PAQ: The agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. The standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Victimization conducted by the Department of Justice.</p> <p>Policy (page 26, section T) states the incident-based data collected shall include, at a minimum, the data necessary The Wayne County Sheriff's Office shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.</p> <p>The auditor reviewed the Survey of Sexual Victimization Substantiated Incident Form (Adult) for verification.</p> <p><b>115.87 (b)</b></p> <p>PAQ: The agency aggregates the incident-based sexual abuse data at least annually.</p> <p>Policy (page 26, section T) states the Wayne County Sheriff's Office shall aggregate the incident-based sexual abuse data at least annually.</p> <p>No incident-based sexual abuse data was available for review.</p> <p><b>115.87 (c)</b></p> <p>PAQ: The standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Victimization (SSV) conducted by the Department of Justice.</p> <p>Policy (page 26, section T) states the incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Victimization conducted by the Department of Justice.</p> <p>The auditor reviewed the Critical Incident Report Form and Survey of Sexual Victimization Substantiated Incident Form (Adult) for verification.</p> <p><b>115.87 (d)</b></p> <p>PAQ: The agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.</p> <p>Policy (page 26, section T) states the Wayne County Sheriff's Office shall maintain, review, and collect data as needed from all available incident- based documents, including reports, investigation files, and sexual abuse incident reviews.</p> <p><b>115.87 (e)</b></p> <p>N/A; The agency does not contract for the confinement of its residents.</p> <p><b>115.87 (f)</b></p> <p>N/A; The DOJ has not requested agency data.</p> <p>Policy (page 26, section T) states upon request, the Wayne County Sheriff's Office shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.</p> <p><b>Conclusion and Corrective Action:</b></p> <p>Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding data collection. Corrective action is complete.</p> <p><b>115.87 (b)</b></p> <p>The agency provided an annual report with aggregated data for 2017-2021 (June 3, 2022).</p>

115.88	<b>Data review for corrective action</b>
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

**The following evidence was analyzed in making the compliance determination:**

**Documents:**

1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)
2. WCSO Pre-Audit Questionnaire (PAQ)

**Document (Corrective Action):**

1. 2021 Annual Report (June 3, 2022)

**Interviews:**

1. Agency Head Designee (Captain)
2. PREA Coordinator

**Findings (by provision):**

**115.88 (a)**

PAQ: The agency reviews 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, and training, including:

- Identifying problem areas;
- Taking corrective action on an ongoing basis; and
- Preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.

Policy (page 26, section T) states the Wayne County Sheriff's Office shall review data collected and aggregated in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by:

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

No annual reports were available for review.

**115.88 (b)**

PAQ: The annual report includes a comparison of the current year's data and corrective actions with those from prior years. The annual report provides an assessment of the agency's progress in addressing sexual abuse.

Policy (page 26, section T) states such report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the Wayne County Sheriff's Office's progress in addressing sexual abuse.

No annual reports were available for review.

**115.88 (c)**

PAQ: The agency makes its annual report readily available to the public at least annually through its website. The annual reports are approved by the agency head.

Policy (page 26, section T) states the Wayne County Sheriff's Office's report shall be approved by the Wayne County Sheriff's Office's head and made readily available to the public through its website.

Annual reports were not published on the agency's website. No annual reports were available for review.

**115.88 (d)**

PAQ: When the agency redacts material from an annual report for publication the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility. The agency indicates the nature of material redacted.

Policy (page 27, section T) states the Wayne County Sheriff's Office may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility, but shall indicate the nature of the material redacted.

No annual reports were available for review.

**Conclusion and Corrective Action:**

Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding data review for corrective action. Corrective action is complete.

The agency provided a 2021 Annual Report (June 3, 2022). The report is fully inclusive of the standard requirements.

115.89	<b>Data storage, publication, and destruction</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1086 300"><b>The following evidence was analyzed in making the compliance determination:</b></p> <p data-bbox="242 306 376 331"><b>Documents:</b></p> <ol data-bbox="242 338 943 400" style="list-style-type: none"> <li>1. WCSO Policy Number 15.001: Prison Rape Elimination Act (PREA)</li> <li>2. WCSO Pre-Audit Questionnaire (PAQ)</li> </ol> <p data-bbox="242 430 571 459"><b>Document (Corrective Action):</b></p> <ol data-bbox="242 465 727 495" style="list-style-type: none"> <li>1. 2021 Annual Report Published (June 3, 2022)</li> </ol> <p data-bbox="242 521 501 551"><b>Findings (by provision):</b></p> <p data-bbox="242 557 349 586"><b>115.89 (a)</b></p> <p data-bbox="242 593 1129 622">PAQ: The agency ensures that incident-based and aggregate data are securely retained.</p> <p data-bbox="242 647 1461 676">Policy (page 27, section T) states the Wayne County Sheriff's Office shall ensure that data collected are securely retained.</p> <p data-bbox="242 701 1461 797">The PREA Coordinator stated the jail reviews data collected and aggregated in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, and training. The agency ensures that data collected is securely retained.</p> <p data-bbox="242 824 349 853"><b>115.89 (b)</b></p> <p data-bbox="242 860 1461 922">PAQ: Agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public, at least annually, through its website.</p> <p data-bbox="242 949 1461 1046">Policy (page 27, section T) states the Wayne County Sheriff's Office shall make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means.</p> <p data-bbox="242 1072 1129 1102">Aggregated sexual abuse data was not readily available to the public through its website.</p> <p data-bbox="242 1128 349 1158"><b>115.89 (c)</b></p> <p data-bbox="242 1164 1382 1193">PAQ: Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers.</p> <p data-bbox="242 1220 1414 1283">Policy (page 27, section T) states before making aggregated sexual abuse data publicly available, the Wayne County Sheriff's Office shall remove all personal identifiers.</p> <p data-bbox="242 1310 684 1339">No annual reports were available for review.</p> <p data-bbox="242 1366 349 1395"><b>115.89 (d)</b></p> <p data-bbox="242 1402 1477 1464">PAQ: The agency maintains sexual abuse data sexual abuse data collected pursuant to §115.387 for at least 10 years after the date of initial collection, unless Federal, State, or local law requires otherwise.</p> <p data-bbox="242 1491 1477 1554">Policy (page 27, section T) states the Wayne County Sheriff's Office shall maintain sexual abuse data collected pursuant to Section T.1. for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.</p> <p data-bbox="242 1581 684 1610">No annual reports were available for review.</p> <p data-bbox="242 1637 616 1666"><b>Conclusion and Corrective Action:</b></p> <p data-bbox="242 1673 1477 1736">Based upon the review and analysis of the available evidence, the auditor has determined the facility is fully compliant with this standard regarding data storage, publication, and destruction. Corrective action is complete.</p> <p data-bbox="242 1762 349 1792"><b>115.89 (b)</b></p> <p data-bbox="242 1798 1187 1827">The annual report with aggregated data for 2017-2021 was published on the agency's website.</p>

115.401	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="242 210 451 235"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1086 295"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="242 304 703 499" style="list-style-type: none"> <li>1. WCSO Pre-Audit Questionnaire (PAQ)</li> <li>2. Interviews</li> <li>3. Research</li> <li>4. Policy Review</li> <li>5. Document Review</li> <li>6. Observations during onsite review of facility</li> </ol> <p data-bbox="242 530 347 555"><b>Findings:</b></p> <p data-bbox="242 564 1474 656">During the three-year period starting on August 20, 2013, and the current audit cycle, Wayne County Jail ensured that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once. Also, one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited.</p> <p data-bbox="242 687 1490 882">The auditor was given access to, and the ability to observe, all areas of the Wayne County Jail. The auditor was permitted to conduct private interviews with inmates at the facility. The auditor sent an audit notice to the facility more than six weeks prior to the on-site audit. The facility confirmed the audit notice was posted by emailing pictures of the posted audit notices. The audit notice contained contact information for the auditor. The inmates were permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel. No confidential information or correspondence was received.</p> <p data-bbox="242 913 376 938"><b>Conclusion:</b></p> <p data-bbox="242 947 1437 1008">Based upon the review and analysis of the available evidence, the auditor has determined the agency and facility is fully compliant with this standard regarding frequency and scope of audits. No corrective action is required.</p>

115.403	<b>Audit contents and findings</b>
	<p data-bbox="240 147 740 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 453 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 1086 300"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="240 304 703 465" style="list-style-type: none"> <li>1. WCSO Pre-Audit Questionnaire (PAQ)</li> <li>2. Policy Review</li> <li>3. Documentation Review</li> <li>4. Interviews</li> <li>5. Observations during onsite review of facility</li> </ol> <p data-bbox="240 501 1453 528">All Wayne County Jail PREA audit reports are published on the agency's website at: <a href="http://www.waynetnso.com/prea.php">http://www.waynetnso.com/prea.php</a></p> <p data-bbox="240 564 373 591"><b>Conclusion:</b></p> <p data-bbox="240 595 1437 649">Based upon the review and analysis of the available evidence, the auditor has determined the agency and facility is fully compliant with this standard regarding audit contents and findings. No corrective action is required.</p>

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

<b>115.13 (a)</b>	<b>Supervision and monitoring</b>	
	Does the facility have a documented staffing plan that provides for 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



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

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

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.)	na
<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	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.)	no
	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.)	na
	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.)	na
<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.)	na
<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?	no
	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).)	na
<b>115.31 (a)</b>	<b>Employee training</b>	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
<b>115.31 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes

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



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

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

<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>	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
<b>115.41 (f)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

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

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

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

<b>115.51 (b)</b>	<b>Inmate reporting</b>	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
<b>115.51 (c)</b>	<b>Inmate reporting</b>	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.51 (d)</b>	<b>Inmate reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
<b>115.52 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
<b>115.52 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	na
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	na
<b>115.52 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	na
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	na

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



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

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

<b>115.64 (b)</b>	<b>Staff first responder duties</b>	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
<b>115.65 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
<b>115.66 (a)</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	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).	no
<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na
<b>115.81 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
<b>115.81 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
<b>115.81 (e)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
<b>115.82 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
<b>115.82 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes



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

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

<b>115.88 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	no
	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?	no
	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?	no
<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?	no
<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?	no
<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?	no
<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?	no
<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?	no
<b>115.89 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes

<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	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