

PREA AUDIT REPORT Interim Final
ADULT PRISONS & JAILS

Date of report: 09/15/2016

Auditor Information			
Auditor name: Jeff Rogers			
Address: P.O. Box 1628 Frankfort, Kentucky 40602			
Email: jamraat02@gmail.com			
Telephone number: 502-320-4769			
Date of facility visit: 09/07/2016			
Facility Information			
Facility name: Boone County Jail			
Facility physical address: 320 Conrad Lane, Burlington, Kentucky 41005			
Facility mailing address: <i>(if different from above)</i>			
Facility telephone number: 859-334-2143			
The facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input checked="" type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input type="checkbox"/> Private for profit
	<input type="checkbox"/> Private not for profit		
Facility type:	<input type="checkbox"/> Prison	<input checked="" type="checkbox"/> Jail	
Name of facility's Chief Executive Officer: Ed Prindle			
Number of staff assigned to the facility in the last 12 months: 70			
Designed facility capacity: 500			
Current population of facility: 610			
Facility security levels/inmate custody levels: minimum to maximum			
Age range of the population: 18-75			
Name of PREA Compliance Manager: Michael Berry		Title: Sergeant/PREA Compliance Manager	
Email address: mberry@boonecountyky.org		Telephone number: 859-334-2143	
Agency Information			
Name of agency: Boone County Jail			
Governing authority or parent agency: <i>(if applicable)</i> Boone County Fiscal Court			
Physical address: 3020 Conrad Lane, Burlington, Kentucky 41005			
Mailing address: <i>(if different from above)</i>			
Telephone number: 859-334-2143			
Agency Chief Executive Officer			
Name: Ed Prindle		Title: Elected Jailer	
Email address: eprindle@boonecountyky.org		Telephone number: 859-334-2143	
Agency-Wide PREA Coordinator			
Name: Oscar Jeffries		Title: Sergeant/PREA Coordinator	
Email address: ojeffries@boonecountyky.org		Telephone number: 859-334-2143	

AUDIT FINDINGS

NARRATIVE

The Prison Rape Elimination Act (PREA) on-site audit of the Boone County Jail in Burlington, Kentucky was conducted on September 7, 2016 by Jeff Rogers from Frankfort, Kentucky, a U.S. Department of Justice Certified PREA Auditor for adult prisons and jails. Pre-audit preparation included a thorough review of all documentation and materials submitted by the facility along with the data included in the completed Pre-Audit Questionnaire. The documentation reviewed included agency policies, procedures, forms, education materials, training curriculum, organizational charts, posters, brochures and other PREA related materials that were provided to demonstrate compliance with the PREA standards. This review prompted a series of questions that were reduced to writing and submitted to the PREA Coordinator for review. Answers to the questions were submitted by the the PREA Coordinator and reviewed by the auditor prior to the on-site audit. All issues found during the pre-audit review were corrected to the satisfaction of the auditor. During the on-site audit, the auditor was provided a private, key only accessible office in the facility from which to work and conduct confidential interviews. Formal personal interviews were conducted with facility staff, inmates and contractors. The auditor interviewed 10 random inmates from various housing units. Ten (10) random staff members were interviewed representing all three shifts. Also interviewed were 16 specialty staff using the DOJ Questionnaires assigned to the following specialty staff:

- Medical and Mental Health Staff (2)
- PREA Coordinator
- PREA Compliance Manager
- Warden/Jailer
- Staff Person who Monitors Retaliation
- Investigator (2)
- Human Resources
- Incident Review Team
- Intake Staff
- Person Who Conducts Screening/Risk Assessments
- Intermediate or Higher Level Staff who Conduct Unannounced Rounds (2)
- Staff Who Supervise Inmates in Segregation (2)

Random Inmates were interviewed using the recommended DOJ protocols that question their knowledge of a variety of PREA protections generally and specifically their knowledge of reporting mechanisms available to inmates to report abuse or harassment. Specialty Staff and Random Staff were questioned using the DOJ protocols that question their PREA training and overall knowledge of the agency's zero tolerance policy, reporting mechanisms available to inmates and staff, the response protocols when an inmate alleges abuse, and first responder duties. The auditor reviewed personnel records for six staff members to determine compliance with training mandates and background check procedures. Records for five inmates in the facility were reviewed to evaluate screening and intake procedures and inmate education. The jail maintains a memorandum of understanding with the Women's Crises Center of Northern Kentucky to provide emotional support services to victims of sexual abuse and they also provide a toll free hotline that inmates or staff can use to report an allegation of sexual abuse or harassment. The auditor toured the facility escorted by the PREA Coordinator and the PREA Compliance Manager and observed among other things the facility configuration, location of cameras and mirrors, staff supervision of inmates, dorm layout including shower/toilet areas, placement of posters and PREA informational resources, and security monitoring. The auditor noted that shower areas allow inmates to shower separately. Notices of the PREA audit were posted on July 27, 2016 throughout the facility in common areas. During the course of the audit, staff members were interviewed in the training/multipurpose room in the administrative part of the jail. Inmates were interviewed in the inmate area outside of the control center, The interview room had glass to allow the inmate and auditor to be observed by control center staff. The jail also has a separate facility called the work camp. This camp houses 76 inmates that are classified as community custody inmates and work in the community on various projects. The camp has dormitory style housing and has its own kitchen and other space such as a control center, a snack room and bathrooms. Two inmates were interviewed at this location and the one staff member on duty was also interviewed after going on a tour of the building. One unique feature the jail utilizes is the closed circuit television at the jail that runs the PREA Education video and other pertinent PREA information continually. This feature was mentioned by several inmates as part of the source of their PREA knowledge.

DESCRIPTION OF FACILITY CHARACTERISTICS

The Boone County Jail is located in Burlington, Kentucky approximately 15 miles from Cincinnati, Ohio. The Boone County Jail has the capacity to house 424 maximum, medium and minimum security inmates at the main jail and 76 minimum security inmates at the work camp facility. There is a total of 97,241 square feet at the jail and 9,400 square feet at the work camp. The jail services all law enforcement agencies in Boone County including the Florence Police Department, the Boone County Sheriff's Department, the Greater Cincinnati Airport Police Department, and the Kentucky State Police. The jail also contracts with the Federal Bureau of Prisons for housing federal inmates and the Immigration Control Enforcement for housing ICE detainees, and the United States Marshall's Service and the Kentucky Department of Corrections for their inmates. Last year 8442 prisoners were processed through the County jail system. The Boone County Jail system consists of two facilities. The minimum security Work Camp located at 5359 Bullitsville Road 4/10 of a mile from the main jail which is located at 3020 Conrad Lane. At the workcamp there is three (3) open bay dorms for the inmates. At the main jail there are 79 housing units. Of those 67 are for general population inmates including minimum, medium, and maximum inmates. There are 12 high risk housing units, eight (8) are for high risk inmates such as suicide watch inmates and four (4) for detoxification inmates. In each of the 79 housing units are shower and toilet facilities allowing for one at a time showers and use of the toilet. Jail staff make rounds at least every hour but in reality they patrol much more frequently than that. One inmate said the officers are always around checking on the inmates. In addition to staff patrols there are multiple surveillance cameras recording every movement throughout the jail. Security is very good at the jail. There was no inmate noise or commotion during the audit. Of the inmates interviewed all shared they felt safe at the jail. Also the inmates said the staff are helpful and treat them with respect which was witnessed by the auditor during the audit.

In addition to the housing units the jail has an intake area, a kitchen, laundry, outside/inside recreation areas, training room, staff lounge and workout area with weights and stationary bikes and treadmills, and offices for administrative staff. The training room is state of the art and allows the jail staff to be trained away from inmates. In addition to training provided by jail personnel, the Kentucky Department of Corrections also provides training including a training program called Crimcast which is an online training forum.

The Boone County Jail is one of 88 full service jails in Kentucky (there are 120 counties). The facility was built in 2005. It still maintains a "just moved in" look. The facility uses scanner/ bar codes to identify every movement, housing assignments, and everything related to an inmate who is being housed at the jail. The jail is technologically advanced for a jail operation. The facility has 187 surveillance cameras situated at strategic locations throughout the jail. Images are electronically stored for use in investigations. In addition to the inside of the jail, cameras are also located outside so recreation can be recorded. The same is true at the work camp. The facility also utilizes security mirrors to augment surveillance throughout the facility.

The state of Kentucky is unique in that it is the only state that elects its county jailer. The current jailer has been at the facility for 30 years with 15 of those years as elected jailer.

The Boone County Jail has a national reputation for efficiency. The Boone County Jail Work Program includes inmates cutting county grass, litter pickup, and dump site cleanup and provides over \$700,000 worth of free labor to the county each year. The Jail Work Camp grows a garden each year to offset the food costs of the operation. The inmate in charge of the garden was very proud of what the garden provides.

The jail offers programs for inmates including A.A., Life Skills, and Bible Study in four separate religious preferences, and the GED program. There is a part-time mental health clinician at the jail who provides mental health related services to inmates. This staff works in the evening hours.

SUMMARY OF AUDIT FINDINGS

Overall, the interviews of inmates reflected that they were aware of and understood the PREA protections and the agency's zero tolerance policy. Inmates receive written materials at intake that provide detailed information about PREA protections, the multiple ways to report sexual abuse or harassment and ways to protect themselves from abuse. Subsequent to intake, inmates are provided more comprehensive education on PREA that includes personal instruction in addition to a video that addresses PREA that is shown on the inmates closed circuit television station..

There are also PREA posters in English and Spanish to assist in educating inmates about PREA.

Inmates indicated they understand the various ways to report abuse and discussed the posters throughout the facility with the telephone number to call to report sexual abuse or harassment. Inmates were able to articulate to the auditor what they would do and who they would tell if they were sexually abused or harassed. Inmates reported they could tell a trusted staff member, friend or family member, file a request for help form, or call the sexual abuse hotline telephone number at the Women's Crises Center of Northern Kentucky. Inmates indicated to the auditor that they felt safe in the facility. Inmates were also aware that outside services were available including counseling for sexual abuse and harassment. After the audit was complete the auditor spoke with the Director of the Women's Crises Center of Northern Kentucky to discuss the services provided by the Center. At this time the Center had not been notified by the Jail of anyone requesting assistance.

There were 2 sexual abuse/harassment allegations that were PREA related in the past 12 months. Both were determined to be Unfounded after the investigations were complete.

All facility staff interviewed indicated they had received detailed PREA training and could articulate the meaning of the agency's zero tolerance policy. Staff was knowledgeable about their roles and responsibilities in the prevention, reporting and response to sexual abuse and sexual harassment. Staff consistently articulated the variety of reporting mechanisms for inmates and staff to use to report sexual abuse or sexual harassment. Additionally, staff were well trained on the PREA first responder's protocol for any PREA related allegation and could clearly articulate exactly the steps they would follow if they were the first responder to an incident. There were no incidents where a first responder was utilized.

In summary, after reviewing all pertinent information and after conducting inmate and staff interviews, the auditor found that jail leadership have clearly made PREA compliance a high priority and have devoted a significant amount of time and resources to policy development, training of staff and education of residents on all the key aspects of PREA

Number of standards exceeded: 0

Number of standards met: 39

Number of standards not met: 0

Number of standards not applicable: 4

Standard 115.11 Zero tolerance of sexual abuse and sexual harassment; PREA Coordinator

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

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.

The following information was utilized to verify compliance with this standard:

- Facility PREA Policy pages 23-25
- Facility Organization Chart
- Interviews with PREA Coordinator and PREA Compliance Manager

The agency/facility has adopted a Zero Tolerance Policy toward sexual abuse, harassment, and sexual misconduct. The policy outlines the facility's approach to protecting inmates and staff from sexual abuse and harassment. The PREA Coordinator position is included in the facility's organization chart. His supervisor is the Chief Deputy at the jail. According to the PREA Coordinator and the PREA Compliance Manager interviews, both said they had sufficient time to perform their PREA related duties.

Standard 115.12 Contracting with other entities for the confinement of inmates

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

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.

The Boone County Jail does not house its prisoners in other locations. However, the U.S. Marshall's Service and the Immigration Control Enforcement Agency house prisoners at the Boone County Jail. Therefore this standard is not applicable. It should be noted that the Marshall's Service requires any entity housing their prisoners must be PREA Certified. The ICE will also audit the Boone County Jail for PREA in relation to its inmates.

Standard 115.13 Supervision and monitoring

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

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.

The following information was utilized to verify compliance with this standard:

Boone County Personnel Policy page 18

Boone County Search Policy page 48

Interview with Jailer

Interview with PREA Coordinator

The interview with the Jailer and PREA Coordinator confirmed that when developing the staffing plan all factors listed in this regulation (1-11) are utilized although there has been no findings of inadequacy from any federal investigative agencies nor any other oversight body. According to the Jailer there has not been any incident where the staffing plan was not met.. The PREA Coordinator also said he was involved with staffing plan development as needed but no less than every 12 months. Unannounced rounds are conducted on every shift by the shift supervisor and recorded in the shift report. The facility maintains 187 cameras that can be viewed by multiple upper management staff at any time. The recordings from these cameras are maintained for at least 30 days. In the control center the staff at that location can also monitor surveillance screens.

Standard 115.14 Youthful inmates

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

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.

The Boone County Jail does not house Youthful Offenders. In Kentucky all Youthful Offenders are housed by the State Department of Juvenile Justice. Therefore this regulation is not applicable to this facility.

Standard 115.15 Limits to cross-gender viewing and searches

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

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.

The following information was utilized to verify compliance with this standard:

Boone County Search Policy page 14-15

Training Curriculum for Searching of Transgendered and Intersex Inmates

Interviews with Random Staff
Interviews with Random Inmates

The facility does not allow a body cavity search except when conducted by trained medical staff such as a doctor or Registered Nurse. Cross gender pat down searches are not allowed. There is always at least one (and most times several) female on duty at all times. All random staff interviewed said they had been trained in conducting pat down searches of Transgender or Intersex Inmates. This is documented in staff training records. The training is conducted annually. All random staff interviews also confirmed they were aware of the policy prohibiting the searching of a Transgender or Intersex Inmate for the purpose of determining the inmates genital status. Random Inmate interviews confirmed that staff of the opposite gender announce their presences when entering a housing unit that has inmates of the opposite gender from themselves.

Standard 115.16 Inmates with disabilities and inmates who are limited English proficient

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

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.

The following information was utilized to verify compliance with this standard:

Interpretive Services Through Language Line
Interview with PREA Coordinator

The interviews with random staff confirmed that the language line is available to assist with translations. During the past 12 months this service has been utilized 16 times. There are posters in Spanish and English in the housing units that speak to PREA and who and how to access services. The PREA Coordinator said that if there is a problem with an inmate who has speech or a hearing issue a one on one session with the inmate and a staff member is arranged. Facility policy prohibits inmates from interpreting for other inmates except in emergency circumstances.

Standard 115.17 Hiring and promotion decisions

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

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.

The following information was utilized to verify compliance with this standard:

Boone County Jail Personnel Policy for Staffing page 18

Boone County Jail Social Services Policy page 34

Examples of Background Checks

Interview with Chief Deputy

The Boone County Jail will not hire anyone who has engaged in any type of sexual misconduct according to the Chief Deputy. Policy spells out this requirement. This same requirement is true for volunteers and contractors. A criminal background check is conducted for each potential employee prior to hire. Each employee has a background check every year and the Chief Deputy said that staff has an affirmative duty to report any criminal behavior or sexual misconduct charges throughout the year. A part of the application process requires potential employees to disclose any previous sexual misconduct.

Standard 115.18 Upgrades to facilities and technologies

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

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.

Interview with Jailer

According to the Jailer there has been no upgrading of either the facility or camera system since the last PREA audit that occurred in April 2015. The Jailer did say that any upgrades to the facility or its camera system would take into consideration the the protection of inmates from sexual abuse.

Standard 115.21 Evidence protocol and forensic medical examinations

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

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.

The following information was utilized to verify compliance with this standard:

MOU with the Women's Crises Center of Northern Kentucky (Rape Crises Center)

License for Qualified Mental Health Practitioner

Interview with Director of Women's Crises Center

A Memorandum of Understanding exists between the Boone County Jail and Women's Crise Center of Northern Kentucky to provide emotional support services/victim advocacy services for any inmate that is in need for emotional support services because of a sexual abuse or harassment allegation. The MOU also provides for a "hotline" number that inmates can call to report sexual abuse or harassment and can do so anonymously. The facility also has a mental health practitioner that can assist victims of a sexual abuse incident. The Boone

County Jail has two investigators for PREA. The investigators follow a uniform evidence protocol as does the Boone County Sheriff's Office who conduct criminal investigations at the Jail. If SANE or SAFE forensic exam services are needed these are performed at the nearby St. Elizabeth Hospital in Florence.

Standard 115.22 Policies to ensure referrals of allegations for investigations

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

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.

The following information was utilized to verify compliance with this standard:
Boone County Jail PREA Policy page 23-24

The PREA Coordinator who is also a PREA Investigator is notified if an allegation of sexual abuse or harassment occurs. During the course of an administrative investigation if it appears criminal charges are in order then the Boone County Sheriff's Office is called in to investigate. Both the facility and the Sheriff's Office has policy on conducting Sexual Abuse Investigations. Boone County Jail Policy outlines the investigative process at the jail.

Standard 115.31 Employee training

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

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.

The following information was utilized to verify compliance with this standard:

- Training Curriculum for PREA
- Examples of Training Records
- Boone County Jail Personnel Policy page 12
- Interviews with Random Staff
- Verification letter from Jailer That All Staff Have Been Trained

The training curriculum is used to assist the training of jail staff. It includes all necessary elements of the PREA Regulations. Training records, random staff interviews and the statement from the jailer confirm that all jail staff have been trained in the PREA. Policy requires each employee be trained in new employee orientation training and annually thereafter. In the ten random staff interviews each staff could articulate their responsibilities under PREA and their understanding of the need to protect inmates and staff from sexual abuse and harassment.

Standard 115.32 Volunteer and contractor training

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

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.

The following information was utilized to verify compliance with this standard:

Training Records
Training Curriculum
Volunteer/contractor Rules and Regulation
Volunteer Acknowledgement Forms

Each volunteer undergoes security clearances prior to becoming a volunteer. Each volunteer and contractor signs an acknowledgement form stating they understand and have received training in the PREA. The auditor reviewed training records as well and found all to be in order. There was no volunteers or contractors at the jail on the day of the on-site visit.

Standard 115.33 Inmate education

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

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.

The following information was utilized to verify compliance with this standard:

Random Inmate Interviews
PREA Inmate Education in Spanish and English
Examples of Inmate Acknowledgement Forms
Closed Circuit Television PREA Information

The Jail provides each inmate with a PREA Pamphlet that explains the facility's zero tolerance policy toward sexual abuse and harassment. Each inmate signs an acknowledgement form stating he/she understands the policy. After intake the inmates are kept informed of the PREA through the use of closed circuit television that airs the PREA Inmate Education video daily. Inmate interviews indicated this occurs daily. The Jail has the PREA information available in Spanish as well as English. If an inmate is booked that does not speak either of these two languages, then the Language Line Translation Resource is utilized to provide interpretive services to the inmate. There are also posters throughout the facility in Spanish and English that have the Rape Crises Center hotline number and address. The jail uses bar code scanning for every aspect of the inmates time at the jail. Thus the jail maintains a computer generated listing of all inmates who have been educated in the PREA regulations in addition to the sign acknowledgement forms signed by the inmate. Random inmate interviews revealed that each inmate was aware of the PREA and how to report allegations and that are free from retaliation for reporting an allegation of sexual

abuse or harassment. If an inmate has a learning disability a staff member reads over the PREA information to that inmate.

Standard 115.34 Specialized training: Investigations

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

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.

The following information was utilized to verify compliance with this standard:

Training Records for Investigators
Training Certificates for Investigators

The Jail has two trained PREA Investigators. One is the PREA Coordinator and the other is the PREA Compliance Manager. Both received training through the Kentucky Department of Corrections PREA Investigator's Training Curriculum. The training included among other things the proper use of Miranda and Garrity warnings, interviewing sexual abuse victims, sexual abuse evidence collection and the criteria and evidence required to substantiate a case of administrative action or prosecution referral. According to the PREA Coordinator the Boone County Sheriff's Office Investigators have also received this training. The PREA Coordinator said because he is a sworn officer, they could also investigate criminal wrong doing related to PREA but prefer to contact the Boone County Sheriff's Office for transparency and independence.

Standard 115.35 Specialized training: Medical and mental health care

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

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.

The following information was utilized to verify compliance with this standard:

Medical Staff Training Records
Interviews with Medical Staff

Both medical staff interviewed indicated they had been trained on how to detect and assess signs of sexual abuse and harassment, how to preserve physical evidence, how to respond effectively and professionally to victims of sexual abuse and harassment and how and to whom to report allegations or suspicions of sexual abuse and harassment. The auditor verified training records of medical staff. Medical staff also receive the PREA training given to all jail employees. The medical staff at the jail are not trained as a SAFE or SANE. These services would be accessed through St. Elizabeth's Hospital in Florence.

Standard 115.41 Screening for risk of victimization and abusiveness

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

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.

The following information was utilized to verify compliance with this standard:

Screening Instrument

Jail Classification Process page 17

Inmate Rules and Regulations pages 10-11 and 20

Jail Disciplinary Policy

Interview with Intake and Risk Assessment Staff

Each inmate is given the PREA information upon intake including the jail's zero tolerance policy and their right to be protected from sexual abuse or harassment. During this process the intake officer assesses each inmate for being at risk of sexual victimization or risk of perpetrating sexual abuse or harassment. The objective screening instrument is a series of questions some with yes/no answers and others with more detail. The assessment form includes numbers 1-10 as outlined in the standard. The screening inquires about prior sexual victimization and violent offenses. After the initial intake, within 72 hours inmates are given their security classification status. The inmate is reassessed within 30 days and at any time there is referral, request, incident of sexual abuse or receipt of additional information relating to the inmate being at risk of victimization or abusiveness. Inmate's risk assessment information is only available to those with a need to know. Inmates are not disciplined for not answering questions contained in the risk assessment.

Standard 115.42 Use of screening information

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

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The following information was utilized to verify compliance with this standard:

Jail Classification Policy page 17-20

Inmate Rules and Regulations pages 10-11

Jail Classification and Shower Policy

Interview with Staff Conducting Risk Assessments

The jail does not have special housing units dedicated for the L,G,B,T, I inmates. Each inmate is placed in a cell that best protects an inmate from being sexually abused or harassed after he/she goes through the intake/booking process according to the intake officer. The

jail has a cell classification form that provides the intake officer with available options for the placement of inmates. The intake officer said that each L,G,B,T,I inmate would be reassessed every 6 months to review any threats made against the inmate. The intake officer and policy indicate a L,G,B,T,I inmate can shower and use the toilet separately from other inmates. She also said that each inmates own view of their safety is considered during the intake process. Each inmate is reassessed within 72 hours of intake to determine appropriate housing and programming assignments. There has been no transgender or intersex inmates at the jail in the since the last PREA audit in April 2015.

Standard 115.43 Protective custody

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

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.

The following information was utilized to verify compliance with this standard:

Jail Classification Policy pages 17-20

Inmate Rules and Regulations pages 10-11

Interview with Intake Officer and Staff Completing the Risk Assessment

The Jail has 4 single cells available for anyone including inmates who fear for their safety or fear of sexual abuse by other inmates. The Jail does not place an inmate into administrative custody unless there are no other alternatives but only as long as is necessary to find a general population bed. There has been no inmates placed in involuntary segregation during the past 15 months because of being sexually abused. The jail has many options available to house inmates both those who are victims or those who are sexually abusive to others. The Jail's Classification Policy outlines the options available for inmates that best protects them from being sexually abused or being abusive to other inmates. Any inmate in administrative/protective custody because he/she is a victim has access to all education or other programming available at the jail.

Standard 115.51 Inmate reporting

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

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.

The following information was utilized to verify compliance with this standard:

Inmate Rules and Regulations page 4

Jail Personnel Policy page 23-24

Interviews with Random Inmates
Interviews with Random Staff
MOU with Women's Crises Center of Northern Kentucky

The Jail has posters throughout the facility that includes the telephone number and address of the Women's Crises Center of Northern Kentucky. Inmates confirmed the presence of these posters and that they were aware they could call them to report sexual abuse or harassment at any time. The inmates also said they could report anonymously through this Center. They also said they could report an allegation to a staff member, family member, or through the hotline number at the Crises Center. Staff were also aware they could report sexual abuse allegations anonymously through the Women's Crises Center. Inmates also said they could fill out a request form to talk to a deputy or call "19" on the inmate phone system to report an allegation of sexual abuse to Jail personnel. It should also be noted that the closed circuit television has a continuing video that is shown that gives out the phone number and address of the Women's Crises Center

Standard 115.52 Exhaustion of administrative remedies

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

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.

The Boone County Jail does not utilize the jail's grievance process for PREA related incidents therefore this standard is not applicable.

Standard 115.53 Inmate access to outside confidential support services

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

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.

The following information was utilized to verify compliance with this standard:

Inmate Rules and Regulations page 4 and 7
MOU with Women's Crises Center of Northern Kentucky
Random Inmate Interviews
Interview with Director of Women's Crises Center of Northern Kentucky

The Jail has entered into a Memorandum of Understanding with the Women's Crises Center of Northern Kentucky. The MOU specifies that the Crises Center would offer emotional support to any inmate who requests this service. The Center will also coordinate emergency support services between the Jail and the St. Elizabeth's Hospital if any inmate is given a rape kit. The Center employee may also accompany the inmate through this process. The Women's Center also maintains a toll free hotline number for inmates or third parties to call and report a sexual abuse allegation and can do so anonymously if desired. The random inmates interviewed verified their awareness

of the hotline number and that they could report anonymously. Inmates are given this information at intake, and can see it on the closed circuit television that plays the PREA video daily. Inmates also said they thought if they did call for services that the information shared between the inmate and counselor would remain private between the two.

Standard 115.54 Third-party reporting

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

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.

The following information was utilized to verify compliance with this standard:

PREA Video in Jail Lobby
Powerpoint Presentation of PREA for Third Party Reporters

The Jail maintains a closed circuit television in the lobby of the Jail that runs the "How to Report Sexual Abuse/Harassment" 24 hours each day of the week. It has the telephone numbers and addresses for third party notification. The Director of the Women's Center was not aware of any third party reports for an inmate at the Jail.

Standard 115.61 Staff and agency reporting duties

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

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.

The following information was utilized to verify compliance with this standard:

Boone County Jaile Personnel Policy pages 23-24
Randon Staff Interviews
Interviews with Medical Staff

Every staff person interviewed including medical and mental health staff said they knew to report any allegation or suspicion of sexual abuse and harassment to the shift supervisor for that shift. From there it goes through the chain of command. The allegation is also reported to the PREA Coordinator and he assigns an investigator to the case. According to staff interviews, staff also do not share information with other staff about any allegation or incident of sexual abuse and harassment. Also staff said they would report any retaliation of staff or inmates to the PREA Coordinator. This was also true if a staff person's negligence led to a sexual assault or harassment of an inmate or staff member. There are no inmates under the age of 18 in the Jail.

Standard 115.62 Agency protection duties

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

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.

The following information was utilized to verify compliance with this standard:

PREA Policy page 24

Interviews with Jailer, PREA Coordinator

There has not been any inmate identified in the past 12 months that was at a substantial risk of imminent sexual abuse. If there was to be an inmate who met this criteria the inmate would be separated from the threat and placed in a safe location until the risk is reduced according to the PREA Coordinator and Jailer.

Standard 115.63 Reporting to other confinement facilities

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

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.

The following information was utilized to verify compliance with this standard:

PREA Policy page 24-25

Interview with Jailer

There has not been any notifications that an inmate was sexually abused while confined at the another facility. If it does occur the Jailer would notify the head of the other facility within 72 hours and would also begin an investigation according to the Jailer.

Standard 115.64 Staff first responder duties

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

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.

The following information was utilized to verify compliance with this standard:

PREA Policy pages 24-26
Interviews with PREA Coordinator
Interviews with Random Staff

The interviews with random staff and the PREA Coordinator indicate that they are aware of their responsibilities as first responders. In the past 12 months there has been no first responder incidents requiring staff to take action. The random staff said they were aware of the steps required which include separating the victim and abuser, notify their supervisor and preserve and protect the crime scene, if the abuse occurs within a time frame that still allows for the collection of physical evidence, then request that the inmate and abuser not take any actions that would destroy any potential evidence. The PREA Coordinator said the abuser would be placed in dry cells until evidence is collected

Standard 115.65 Coordinated response

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

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.

The following information was utilized to verify compliance with this standard:

PREA Policy pages 24-26
Interview with PREA Coordinator

According to the jail's policy the institutional plan is spelled out in this policy. It requires that the staff person taking the allegation report to notify the shift supervisor who will ensure that medical staff are alerted to the situation. The shift supervisor ensures that the reporting inmate not shower or otherwise destroy any evidence. The shift supervisor shall also place the perpetrator in a dry cell to prevent flushing or destruction of evidence. Once medical has been advised and provided assistance, a PREA Investigator is assigned the case. The facility investigator shall notify the Boone County Sheriff for the collection of DNA and other physical evidence when necessary.

Standard 115.66 Preservation of ability to protect inmates from contact with abusers

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

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.

The Jail does not have contracts with any collective Bargaining Unit therefore the standard is not applicable.

Standard 115.67 Agency protection against retaliation

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

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.

The following information was utilized to verify compliance with this standard:

PREA Policy pagee 24-26

The Captain is responsible for monitoring retaliation against any staff or inmate for reporting an allegation of sexual abuse or harassment or cooperates in any investigation of sexual abuse or harassment. The Captain will review weekly disciplinary write ups, changes in an inmates or staff member's behavior and any other suspicious activity for at least 90 days or for as long as the situation presents itself. The use of administrative segregation can be requested by an inmate and approved by the chief deputy or jailer.

Standard 115.68 Post-allegation protective custody

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

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.

The following information was utilized to verify compliance with this standard:

Jail Classification Policy pages 17-20

Interview with PREA Coordinator

There are single cells available for inmates who have suffered sexual abuse. The use of these cells is determined by the Classification process and are in compliance with standard 115.43. There has been no use of post allegation protective custody since the last PREA audit in April 2015.

Standard 115.71 Criminal and administrative agency investigations

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

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.

The following information was utilized to verify compliance with this standard:

PREA Policy pages 24-25
Interviews with PREA Facility Investigators

The policy outlines the steps required of this standard. The facility investigators will review all statements, incident reports, video surveillance footage and review any evidence within the scope of an administrative investigation. If there is any physical evidence the Boone County Sheriff’s Office would be called in to collect and analyze this information. The facility has two PREA investigators who have been trained specifically for this purpose by the Kentucky Department of Corrections and the Department of Justice. If during the administrative investigation it appears there is criminal intent or involvement, then the facility will call in the Boone County Sheriff’s Office to investigate. Facility investigators share information with the Boone County Sheriff. The policy also states that regardless of whether the victim or perpetrator leaves the facility the investigation will continue until the allegation is resolved. If there is enough evidence the Boone County Sheriff’s office would contact the prosecutor for further action.

Standard 115.72 Evidentiary standard for administrative investigations

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

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.

The following information was utilized to verify compliance with this standard:

PREA Policy page 25
Interview with PREA Coordinator

The Policy and PREA Coordinator both indicated that a preponderance of the evidence is used in determining whether allegations of sexual abuse and harassment are substantiated.

Standard 115.73 Reporting to inmates

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

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.

The following information was utilized to verify compliance with this standard:

PREA Policy page 25
Interview with PREA Coordinator
Interview with Jailer

The PREA Coordinator informs all victims of the results of any investigation that has been completed by either the jail's investigators or investigators from the Boone County Sheriff's Office. The PREA Coordinator will subsequently inform the victim whenever the abuser is indicted and convicted on a charge of sexual abuse at the Jail. If the abuser is a staff person, the victim will be informed whenever the abuser has been removed from the victims housing unit or is no longer employed at the facility or has been indicted. There has been no substantiated allegations of sexual abuse or harassment at the jail since the last PREA audit in April 2015.

Standard 115.76 Disciplinary sanctions for staff

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

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.

The following information was utilized to verify compliance with this standard:

Boone County Personnel Policy page 23-24
Interview with PREA Coordinator

The Jail's Personnel Policy allows for the termination of any staff member that violates any agency sexual abuse or harassment policies. If a staff member has violated the sexual abuse and harassment policies that staff person will be disciplined up to and including termination from the jail. The disciplinary sanctions for violating sexual abuse and harassment policies shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history and the sanctions imposed for similar offenses by other staff with similar histories. If the incident was clearly criminal in nature the jail will inform the Boone County Sheriff who may turn the case over to the local prosecutor.

Standard 115.77 Corrective action for contractors and volunteers

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

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.

The following information was utilized to verify compliance with this standard:

Jail Volunteer Policy and Volunteer Packet
Interview with PREA Coordinator

The Volunteer policy as well as KRS 510.120 declares that if any employee, contractor, or volunteer has sexual contact with an inmate that is substantiated then that person can be charged by prosecutors with sexual abuse in the second degree a Felony. There has been no occurrences of this at the jail since the last PREA audit in April 2015..

Standard 115.78 Disciplinary sanctions for inmates

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

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.

The following information was utilized to verify compliance with this standard:

Jail Disciplinary Policy pages 42-45
Interview with PREA Coordinator

Jail policy outlines the disciplinary process when an inmate violates jail rules of conduct including violation of sexual abuse or harassment policies. The disciplinary process takes into consideration the inmates mental health status as well as other examples of previous disciplinary actions taken against other inmates for the same offense. The jail policy does not approve of sexual contact between inmates. There is a part-time mental health professional who provides services to assist inmates with issues surrounding sexual abuse or harassment if the need arise which it has not since the last PREA audit in April 2015.

Standard 115.81 Medical and mental health screenings; history of sexual abuse

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

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.

The following information was utilized to determine compliance with this standard:

Informed Consent Form
Incident Report
Mental Health Policy page 14
Interview with Person Conducting Risk Assessments

The jail policy allows for a referral to a mental health practitioner for any inmate who reports prior sexual victimization or abusiveness toward others with a follow up meeting within 14 days after notification. Medical staff said they obtain informed consent from the inmate before reporting any past sexual victimization that did occur in an institutional setting or the community. While the policy states that follow up meeting will occur within 14 days, the person conducting risk assessments said the meetings would be scheduled within 24-48 hours after arrival. Since the last PREA audit there was a situation where an arrested female claimed her husband had raped her the day before she was arrested. She was sent to the St. Elizabeth Hospital for a forensic examination by a SANE. Information of this type is not shared except between medical/mental health staff, and the PREA Coordinator and the Jailer and Chief Deputy.

Standard 115.82 Access to emergency medical and mental health services

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

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.

The following information was utilized to verify compliance with this standard:

Mental Health Policy pages 36-40
Interview with Medical staff
Interview with PREA Coordinator

Agency policy states that emergency medical/mental health services will be obtained at the St. Elizabeth Hospital in Florence, Kentucky that is located within 7 miles of the jail. All jail staff are also trained in CPR/First Aid and can provide emergency services until medical staff have arrived on the scene. Medical staff said that emergency contraception and sexual transmitted infections prophylaxis are offered where appropriate and at no cost to the victim.

Standard 115.83 Ongoing medical and mental health care for sexual abuse victims and abusers

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

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.

The following information was utilized to verify compliance with this standard:

Medical Policy pages 36-40
Interview with Medical Staff

According to medical staff interviews, victims of sexual abuse are offered medical and mental health evaluations for all inmates victimized by sexual abuse. This evaluation according to these staff, include offering follow-up services as needed. The medical staff said they provide the same level of care as is offered in the community. According to interviews and agency policy inmate victims of sexual abuse are offered tests for sexually transmitted infections. If pregnancy results from sexual abuse at the jail such victims receive timely and comprehensive information about and access to all lawful pregnancy related medical services. These services are provided at no cost to the victim. The medical staff also said that a mental health evaluation is offered to resident-on-resident abusers within 60 days of learning of the abuse history.

Standard 115.86 Sexual abuse incident reviews

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

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.

The following information was utilized to verify compliance with this standard:

PREA Policy page 24-26
Interview with the Jail Captain

According to the Captain a review is completed after each PREA incident if substantiated and a report generated. He also said the team looks at a variety of factors including: the need to change or alter any existing policy; consider whether the incident was motivated by race, ethnicity, gender identity status or perceived status or gang activities; access the staffing levels in that area; and access whether monitoring technology should be deployed or augmented to supplement supervision by staff. The team is composed of members of the facility staff as well as law enforcement officials when necessary. The team consists of the Chief Deputy, PREA Coordinator, the Jailer, Medical and mental health staff as appropriate. There has been no substantiated allegations of sexual abuse or harassment since the last PREA audit in April 2015.

Standard 115.87 Data collection

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

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.

The following information was utilized to verify compliance with this standard:

Interview with PREA Coordinator/Compliance Manager
Jail Annual Report for 2015

The facility has a PREA Coordinator who collects and maintains the data from the jail. He also aggregates this data annually and prepares a report of its data related to PREA by June 30 of each year. This report is posted to the agency's website. The agency utilizes the data from the Survey of Sexual Violence that is reported annually to the DOJ in the preparation of its annual report.

Standard 115.88 Data review for corrective action

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

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.

The following information was utilized to verify compliance with this standard:

Annual Report 2015
Interview with PREA Coordinator/Compliance Manager

The PREA Coordinator maintains all PREA related information and data. He compiles this information and produces an annual report. The report is posted on the jail's website. He assesses the data collected in order to determine if the jail's effort toward prevention, detection and response policies of the PREA Regulations are effective. The annual report is approved by the Jailer. The reports are posted on the facility website.

Standard 115.89 Data storage, publication, and destruction

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

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.

The following information was utilized to verify compliance with this standard:

- Annual Report 2015
- Retention Schedule
- Interview with PREA Coordinator/Compliance Manager

According to the PREA Coordinator all PREA related information is stored in a secure server, password protected. All paper reports and information is locked in cabinets at the facility. The jail removes any personal identifiers in the report. According to the retention schedule all data shall be retained for at least 10 years unless Federal, state or local law requires otherwise which in this case it conflicts with the Kentucky state retention schedule which states five (5) years.

AUDITOR CERTIFICATION

I certify that:

- The contents of this report are accurate to the best of my knowledge.
- No conflict of interest exists with respect to my ability to conduct an audit of the agency under review, and
- I have not included in the final report any personally identifiable information (PII) about any inmate or staff member, except where the names of administrative personnel are specifically requested in the report template.

Jeff Rogers

Auditor Signature

09/15/2016

Date