

# PREA Facility Audit Report: Final

**Name of Facility:** Pike County Correctional Facility

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 01/12/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Angel S Baez-Sprague	<b>Date of Signature:</b> 01/12/ 2024

AUDITOR INFORMATION	
<b>Auditor name:</b>	Baez-Sprague, Angel
<b>Email:</b>	abaez-spra@pa.gov
<b>Start Date of On-Site Audit:</b>	12/04/2023
<b>End Date of On-Site Audit:</b>	12/05/2023

FACILITY INFORMATION	
<b>Facility name:</b>	Pike County Correctional Facility
<b>Facility physical address:</b>	175 Pike County Boulevard, Hawley, Pennsylvania - 18428
<b>Facility mailing address:</b>	175 Pike County Boulevard, Hawley, Pennsylvania - 18428

<b>Primary Contact</b>	
<b>Name:</b>	Todd Schweyer
<b>Email Address:</b>	tschweyer@pikepa.org
<b>Telephone Number:</b>	5707755500

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Craig Lowe
<b>Email Address:</b>	clowe@pikepa.org
<b>Telephone Number:</b>	5707755500

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

<b>Facility Health Service Administrator On-site</b>	
<b>Name:</b>	Zack Clark
<b>Email Address:</b>	zclark@primecaremedical.com
<b>Telephone Number:</b>	5707755500

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	375
<b>Current population of facility:</b>	225
<b>Average daily population for the past 12 months:</b>	208
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No

<b>Which population(s) does the facility hold?</b>	Both females and males
<b>Age range of population:</b>	20-73
<b>Facility security levels/inmate custody levels:</b>	Levels 1,2,3
<b>Does the facility hold youthful inmates?</b>	Yes
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	102
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	6
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	27

#### AGENCY INFORMATION

<b>Name of agency:</b>	Pike County Government
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	506 Broad Street, Milford, Pennsylvania - 18337
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

#### Agency Chief Executive Officer Information:

<b>Name:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	

#### Agency-Wide PREA Coordinator Information

<b>Name:</b>	Todd Schweyer	<b>Email Address:</b>	tschweyer@pikepa.org
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## Facility AUDIT FINDINGS

### Summary of Audit Findings

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

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

#### Number of standards exceeded:

4	<ul style="list-style-type: none"> <li>• 115.17 - Hiring and promotion decisions</li> <li>• 115.41 - Screening for risk of victimization and abusiveness</li> <li>• 115.43 - Protective Custody</li> <li>• 115.67 - Agency protection against retaliation</li> </ul>
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#### Number of standards met:

41
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#### Number of standards not met:

0
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## POST-AUDIT REPORTING INFORMATION

### GENERAL AUDIT INFORMATION

#### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2023-12-04
2. End date of the onsite portion of the audit:	2023-12-05

#### 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 type="radio"/> Yes <input checked="" type="radio"/> No
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### AUDITED FACILITY INFORMATION

14. Designated facility capacity:	375
15. Average daily population for the past 12 months:	208
16. Number of inmate/resident/detainee housing units:	9
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

<b>36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	227
<b>37. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>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:</b>	2
<b>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:</b>	1
<b>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:</b>	0
<b>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:</b>	1
<b>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:</b>	18

<p><b>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:</b></p>	<p>1</p>
<p><b>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:</b></p>	<p>0</p>
<p><b>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:</b></p>	<p>1</p>
<p><b>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:</b></p>	<p>1</p>
<p><b>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:</b></p>	<p>0</p>
<p><b>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):</b></p>	<p>Facility does not have an adequate electronic tracking system that captures the different characteristics for retroactive recall. I have advised them to start tracking this data for their next audit so that it is not a memory and/or attempted paper count.</p>
<p><b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b></p>	
<p><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:</b></p>	<p>102</p>

<b>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:</b>	30
<b>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:</b>	19
<b>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:</b>	Auditor ensured that I sought out all persons in the facility to ensure that no staff, volunteers, or contractors were randomly selected for interviews.

## INTERVIEWS

### Inmate/Resident/Detainee Interviews

#### Random Inmate/Resident/Detainee Interviews

<b>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	15
<b>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b>	<input type="checkbox"/> Age <input type="checkbox"/> Race <input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None



<p><b>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b></p>	<p>Pulled daily rosters and randomly selected individuals from each housing unit, which were separated by gender.</p>
<p><b>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>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):</b></p>	<p>The facility did not have an electronic way of pulling the samples, so the auditor and assistant asked for staff input and randomly asked inmates to see if they met specialized criteria. The information was gathered but in a paper format that was stored in medical files. Facility was advised they needed to find a way to track this for immediate recall for future audits.</p>
<p><b>Targeted Inmate/Resident/Detainee Interviews</b></p>	
<p><b>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>7</p>
<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>	
<p><b>59. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful 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/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/detainees.</p> <p><input type="checkbox"/> The inmates/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/detainees).</b></p>	<p>Checked daily rosters and confirmed no youthful inmates present. Through staff interviews and onsite documentation review confirmed there was 1 under 18 onsite less than 24 hours on constant watch in intake.</p>
<p><b>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:</b></p>	<p>4</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>3</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>We did not identify any blind or visibly impaired inmate</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>1</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>1</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>1</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>1</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>There were no current inmates who reported sexual abuse at this facility.</p>
<p><b>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:</b></p>	<p>1</p>
<p><b>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:</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>This auditor did not see in any investigatory files, and there was no indication from staff nor inmate interviews that allegations of Sexual Abuse, Harassment, Retaliation, or violations of PREA policies were not investigated in compliance with the standards.</p>
<p><b>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>Very low allegation rate at the facility. The lack of Sexual Abuse allegations can be supported by the overall organization and logistical operations at the facility. The cells are laid out in a manner that allows for line of sight into the cells, without violating the cross-gender prohibition against viewing inmates using the toilet/showering. There are no isolated areas on the units (supply/broom closets) and supplies are on rolling carts that can be taken on and off the units as needed. The showers have curtains that are shortened to ensure that only one inmate is in each stall at a time. The inmates only work in areas that have adequate camera coverage. Inmates are do not work with areas that they can have access to isolation including Maintenance. In areas like the Kitchen and laundry there are large glass windows that look into the areas and camera coverage. Restroom, walk in freezers/refrigerators are all locked and inmates are directly supervised by the staff. The layout and Interviews with staff, and inmates, did not lead this auditor to believe that the low rate was not accurate.</p>
<p><b>Staff, Volunteer, and Contractor Interviews</b></p>	
<p><b>Random Staff Interviews</b></p>	
<p><b>71. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>5</p>

<p><b>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b></p>	<p><input type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input checked="" type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p><b>If "Other," describe:</b></p>	<p>Gender</p>
<p><b>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>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):</b></p>	<p>All staff was randomly sampled by shift and gender.</p>
<p><b>Specialized Staff, Volunteers, and Contractor Interviews</b></p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p><b>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b></p>	<p>17</p>
<p><b>76. Were you able to interview the Agency Head?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<b>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>78. Were you able to interview the PREA Coordinator?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>79. Were you able to interview the PREA Compliance Manager?</b>	<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)

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

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



	<input type="checkbox"/> Other
<b>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of CONTRACTORS who were interviewed:</b>	2
<b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
<b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	All staff were made available to this auditor.

## SITE REVIEW AND DOCUMENTATION SAMPLING

### Site Review

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

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

Yes

No

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

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

Yes

No

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

Yes

No

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

Yes

No

**88. Informal conversations with staff during the site review (encouraged, not required)?**

Yes

No

<p><b>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).</b></p>	<p>Inmates and staff were randomly interviewed through out the tour of the facility and documented in the audit tool. All areas were toured and there were no locations that were off limits.</p>
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**Documentation Sampling**

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

<p><b>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?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p><b>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</b></p>	<p>Information was randomly sampled onsite in addition to requesting samples throughout the audit.</p>
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**SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY**

**Sexual Abuse and Sexual Harassment Allegations and Investigations Overview**

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

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

	<b># of sexual abuse allegations</b>	<b># of criminal investigations</b>	<b># of administrative investigations</b>	<b># of allegations that had both criminal and administrative investigations</b>
<b>Inmate-on-inmate sexual abuse</b>	0	0	0	0
<b>Staff-on-inmate sexual abuse</b>	1	0	1	0
<b>Total</b>	1	0	1	0

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

	<b># of sexual harassment allegations</b>	<b># of criminal investigations</b>	<b># of administrative investigations</b>	<b># of allegations that had both criminal and administrative investigations</b>
<b>Inmate-on-inmate sexual harassment</b>	2	0	2	0
<b>Staff-on-inmate sexual harassment</b>	2	0	2	0
<b>Total</b>	4	0	4	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
<b>Inmate-on-inmate sexual abuse</b>	0	0	0	0	0
<b>Staff-on-inmate sexual abuse</b>	0	0	0	0	0
<b>Total</b>	0	0	0	0	0

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

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

### Sexual Harassment Investigation Outcomes

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

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

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
<b>Inmate-on-inmate sexual harassment</b>	0	0	0	0	0
<b>Staff-on-inmate sexual harassment</b>	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
<b>Inmate-on-inmate sexual harassment</b>	0	0	2	0
<b>Staff-on-inmate sexual harassment</b>	0	3	2	0
<b>Total</b>	0	3	4	0

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

**Sexual Abuse Investigation Files Selected for Review**

<b>98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:</b>	1
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<p><b>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p><b>Inmate-on-inmate sexual abuse investigation files</b></p>	
<p><b>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>0</p>
<p><b>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>Staff-on-inmate sexual abuse investigation files</b></p>	
<p><b>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>1</p>
<p><b>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p><b>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p><b>Sexual Harassment Investigation Files Selected for Review</b></p>	
<p><b>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>7</p>
<p><b>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p><b>Inmate-on-inmate sexual harassment investigation files</b></p>	
<p><b>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>2</p>
<p><b>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p><b>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>



<b>Staff-on-inmate sexual harassment investigation files</b>	
<b>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	5
<b>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</b>	<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)
<b>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<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 harassment investigation files)
<b>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</b>	There we no criminal investigations in the last 12 months.
<b>SUPPORT STAFF INFORMATION</b>	
<b>DOJ-certified PREA Auditors Support Staff</b>	
<b>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.</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No

## Non-certified Support Staff

**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.**

- Yes  
 No

**a. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:**

1

## 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

<b>Standards</b>
<p><b>Auditor Overall Determination Definitions</b></p> <ul style="list-style-type: none"> <li>• Exceeds Standard (Substantially exceeds requirement of standard)</li> <li>• Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period)</li> <li>• Does Not Meet Standard (requires corrective actions)</li> </ul>
<p><b>Auditor Discussion Instructions</b></p> <p>Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.</p>

<b>115.11</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p><b>SOP 1517 addresses 115.11 a</b></p> <p><i>I. POLICY</i></p> <p><i>The Pike County Correctional Facility has a “zero tolerance” policy pertaining to sexual assault/abuse and sexual harassment of inmates/detainees. All inmates/detainees and staff have the right to be free from sexual abuse and the right to be free from retaliation for reporting sexual abuse. ...All allegations of sexual assault/abuse of inmates/detainees, visitors, contractors, volunteers or employees (verbally, in writing, anonymously, and from third parties) will be immediately investigated by the facilities designated investigators. ...</i></p> <p><i>II. DEFINITIONS</i></p> <p><i>A. Inmate/detainee on inmate/detainee sexual assault will be separated into two categories.</i></p>

*1. Nonconsensual Sexual Acts are defined as:*

*a. Contact of any person without his or her consent, is coerced into such act by overt or implied threats of violence or of a person who is unable to consent or refuse and contact between the penis and the vulva or the penis and the anus including penetration, however slight.*

*b. Contact of any person without his or her consent, is coerced into such act by overt or implied threats of violence or of a person who is unable to consent or refuse, and contact between the mouth and the penis, vulva, or anus.*

*c. Contact of any person without his or her consent, is coerced into such act by overt or implied threats of violence or of a person who is unable to consent or refuse, and penetration of the anal or genital opening of another person, however so slight, by hand, finger, object or other instruments.*

*2. Abusive Sexual Contacts are defined as:*

*a. Contact of any person without his or her consent, is coerced into such act by overt or implied threats of violence or of a person who is unable to consent or refuse and intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person, excluding contact incidental to a physical altercation.*

*b. Exclude incidents in which the intent of the assault is to harm or debilitate rather than to sexually exploit.*

*B. Staff on inmate/detainee sexual misconduct includes behavior or an act of a sexual nature directed toward an inmate/detainee by an employee, volunteer, contractor, official visitor or agency representative. Sexual relationships of a romantic nature between staff and inmates/detainees are prohibited. This includes conversations or correspondences of a romantic or sexual nature. Staff found to have engaged in this conduct will be subject to disciplinary action or criminal charges including removal from their official positions for allegations of sexual abuse or for violation of Facility Sexual Abuse Policy. Removal from one's official position is the presumptive disciplinary sanction for staff who have engaged in, attempted, or threatened to engage in sexual abuse as defined under the definition for sexual abuse of a detainee by a staff member, contractor, or volunteer.*

*1. Consensual or nonconsensual sexual acts include:*

*a. Contact between the penis and the vulva or the penis and the anus, including penetration, however slight.*

*b. Contact between the mouth and the penis, vulva, or anus.*

*c. Contact between the mouth and any body part where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire.*

*d. Penetration of the anal or genital opening, however slight, by a hand, finger, object*

*or other instrument, that is unrelated to official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire.*

*e. Any other intentional contact, either directly or through the clothing, of or with the genitalia, anus, (except in the context of proper searches and medical examinations), groin, breast, inner thigh, or the buttocks that is unrelated to official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire.*

*f. Any attempt, threat or request by a staff member, contractor, or volunteer to engage in the activities described in A-E of this section.*

*g. Any display by a staff member, contractor, or volunteer of his or her uncovered genitalia, buttocks, or breast in the presence of any inmate/detainee.*

*h. Voyeurism by a staff member, contractor, or volunteer.*

*C. Staff on inmates/detainees' sexual harassment includes repeated and unwelcome sexual advances, requests for sexual favors, or gestures, or actions of a derogatory or offensive sexual nature by one inmate/detainee to another, verbal comments, and repeated verbal comments or gestures of a sexual nature to an inmate/detainee by an employee, volunteer, contractor, official visitor, or other agency representative including.*

*1. Demeaning references to gender, sexually suggestive or derogatory comments about body or clothing or.*

*2. Repeated profane or obscene language or gestures.*

*D. Institutional Sexual Assault:*

*1. Institutional Sexual Assault is a criminal offense as stipulated in the Pennsylvania Consolidated Statutes under crimes and offenses, Title 18, chapter 31, subchapter 3124.2 which states the following:*

*A person who is an employee or agent of the Department of Corrections or a County Corrections authority, State or County Correctional authority, youth development center, youth forestry camp, State or County juvenile detention facility, other licensed residential facility serving children and youth, or mental health or mental retardation facility or institution commits a felony of the third degree when that person engaged in sexual intercourse, deviate sexual intercourse, or indecent contact with an inmate/detainee, patient or resident.*

During the onsite audit, this writer noted that Zero Tolerance is reiterated repeatedly throughout the facility on the Inmate's tablets, in the inmates' handbooks, on unit posters, and reaffirmed by Staff and Inmate interviews.

**115.b is addressed in the organizational chart.**

The position of PREA Lieutenant is an upper-level management position that reports directly to the Deputy Warden, who in turn reports to the Warden (Agency Head).

The organizational chart, and interviews, showed that the PREA Lieutenant position, which serves as the PREA Compliance Manager/PREA Coordinator (PCM/PCO) reports directly to the Assistant Deputy Warden who reports directly to the Warden. The PCO/PCM indicated during his interview, and supported by a documentation review, that position is an upper-level agency-wide position where he is afforded sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards at Pike County Prison.

### **Onsite Audit**

The auditor conducted the onsite Audit December 4-5, 2023. The tour was conducted with this Auditor, Auditor Assistant Captain Michael Shirey (RET), PREA Coordinator Todd Schweyer (Lt. PCO).

Areas toured included all housing units: A-unit Male Protective Custody (PC), B-unit Male Classification Level 1 and 2, C-unit Male Class Level 3, D-unit Male Restricted Housing Unit (RHU), E-unit Female General Population, F-unit Female Segregation, G-unit Male Level 3 General Population (GP), H-unit Male General population, K-unit Male General population,

### **Interviews Conducted included the following:**

#### **Inmates:**

22 total interviews- At minimum 1 inmates from each housing unit and 1 inmate from each targeted requirement if the inmate category was present.

A Unit- 4: 1 Hearing impaired, 1 Developmentally disabled, 1 reporting prior Sexual victimization, 1 Random.

B Unit 1: Random.

C unit 2: 1 Random and 1 reporting prior Sexual victimization

D Unit 1: Random

E Unit 2: 1 Physically disabled and 1 Random

F Unit 2: Random

G Unit 2: Random

H Unit 3: Random

K Unit 5: 3 Random, 1 Limited English, and 1 Transgender (Identified but did was not out to jail per their preference/request)

#### **Staff:**

22 Targeted Staff interviews: Spot interviews were also conducted throughout the Onsite Tour

- 1 Warden/Head Administrator
- 1 PREA Coordinator
- 1 HR Executive Asst.
- 1 First Responder
- 1 Non-security First Responder
- 1 Conducts Risk Assessments
- 1 Intermediate/High level supervisor
- 1 Segregation Unit
- 2 Medical Mental Health
- 1 Sexual Abuse Review Committee Member
- 1 Retaliation Monitoring
- 1 Intake
- 1 Health Services Administrator
- 1 Investigator
- 2 Contractor
- 2 2nd shift Random
- 2 3rd Shift Random
- 1 1st Shift Random (overnight shift)

**PREA Coordinator Interview:**

On 12/5/2023, an interview was conducted with Lieutenant Todd Schweyer, who is the current PREA Coordinator (PCO) at Pike County Prison. He was very knowledgeable and answered questioned affirming his, and the facility's, commitment to zero tolerance of sexual abuse and sexual harassment of any inmate in their custody. Throughout the tour of the facility, and further affirmed in his answers to the interview, the PCO pointed out posters throughout, pamphlets, electronic access, phone access, kiosk access, language line access, referred to policy, procedures, and was very knowledgeable about the overall PREA operations at the facility.

Lt. Schweyer indicated that he has ample time, within his daily duties, to monitor overall facility compliance and further expressed that if he ever needed support, the Warden would prioritize PREA compliance by providing him assistance if warranted. The current PREA Standard Operating Procedure (SOP) utilized at the facility (and outlined in policy and procedure SOP 1517) ensures that all allegations of Sexual Abuse and Sexual Harassment are immediately addressed in compliance with the

Federal PREA Standards. Lt. Schweyer provided examples and showed how the mandatory staff reporting system supported by the inmate's ability to immediately access Administration via the kiosk system, ensured allegations are immediately responded to.

**Onsite Observations:**

To ensure compliance with Zero Tolerance, all areas where inmates had access were thoroughly inspected. Before the walking tour began, overall camera coverage of the facility was evaluated at both the Administration work stations and the Closed-Circuit Camera Room. The camera system is a hybrid system of digital and analog video feeds. The video is stored and can be recalled between back to 45 and at the most 60 days. There are 2 observation cells at the facility that were not directly viewable from either camera system access points, instead the cells are in-person monitored by cisgendered security staff. The cells do have camera coverage, but only record so the video can be recalled if needed for an emergency or investigation. The video feeds in those cells also have digital blocking technology over the toilets. The tour included all General population housing unit, Specialized housing units, the Protective Custody unit, and the Restricted Housing Units. Other areas toured including all outdoor and indoor recreation areas, the Counseling/Religious programs corridor, intake/reception processing, medical department, administrative area, central kitchen, visiting area for professional visits, and visiting booths area for family/friends.

The auditor noted that PREA related materials were posted throughout the facility including the Pre-Audit Auditor information posters.

**Housing Unit breakdown is as follows:**

A-unit Male Protective Custody

B-unit Male Classification Level 1 and 2

C-unit Male Class Level 3

D-unit Male Restricted Housing Unit

E-unit Female General Population

F-unit Female Segregation

G-unit Male Level 3 General Population

H-unit Male General population

K-unit Male General population

The facility mitigates Sexual Abuse allegations with their overall organization and logistical operations at the facility. The cells are laid out in a manner that allows for line of sight into the cells, without violating the cross-gender prohibition against viewing inmates using the toilet/showering. There are no isolated areas on the units (supply/broom closets) as supplies are on rolling carts that can be taken on and off



	<p>the units as needed. The showers have curtains that are shortened to ensure that only one inmate is in each stall at a time. The inmates only work in areas that have adequate camera coverage. Inmates do not work within areas that they can have access to isolation, this includes the maintenance department. In areas like the kitchen and laundry there are large glass windows that look into the areas and appropriate camera coverage. Restroom and walk in freezers/refrigerators located in the kitchen area are all locked. Additionally, all inmates are directly supervised by the staff throughout their shifts.</p> <p><b>Strip Searches</b></p> <p>The facility does not allow friends/family contact visits. The only contact visits permitted are legal or specialized professional visits. The visiting room tour showed that inmates did not need to be strip searched in order to participate in the friends/family visits. The visiting booth phones were posted with the limits of confidentiality they would have during conversations. The main lobby where the family/friends would wait for the visit had PREA related materials posted including the Auditors Notice. Legal and Professional visits required the inmates to be body scanned before and after the visit, eliminating the need for routine strip searches. Strip searches are approved by the shift commander on a limited basis where he/she confirms the inmate cannot clear the body scanner for medical reasons, or where the intake officer detects of foreign object on the scan.</p>
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<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Pike Count Correctional does not contract with any entity to house their inmate population. The two contracts provided for review, were updated in relation to the facility housing Federal inmates and ICE civil commitments. All contracts have been updated since 2012 to adopt ICE performance-based detention standards 2.1.1. Sexual Abuse and Assault Prevention and Intervention. Pike county is required to abide by these rules and regulations in regard to housing both Federal inmates and ICE civil commitments.</p>

<b>115.13</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p><b>The Facility provided a staffing plan for 2021 and 2022 that meets Standard 115.13.</b></p>

**115.13 a, b, and c were validated during onsite audit, document reviews, and staff interviews.**

The staffing plan is reviewed annually with the PREA Coordinator's input. The facility ensure compliance with the staffing plan which has been created to provide for adequate staffing levels in all areas of the facility taking into consideration video monitoring to protect inmates against sexual abuse. The plan takes into consideration inmate's daily activity in calculating adequate staffing levels and to determine the need for additional video monitoring. The plan also takes into consideration generally accepted detention/correctional practices; There are no noted judicial findings of inadequacy, findings of inadequacy from Federal investigative agencies; no inadequacy from internal nor external oversight bodies. The plan uses the components of the facility's physical plant to determine staffing levels. During the facility tour, the Auditor (and Assistant Auditor) did not note any locations that would meet the definitions of "blind-spots" that were not mitigated by camera coverage. To the facility's credit, the programming, religious offices, and any office (where inmates met with staff) were in centralized areas with large picture frame windows, and door windows, showing corner to corner into the office space. This physical layout is a means to potentially deter sexual abuse in the facility while offering line of sight viewing that can also protect staff from assaults.

Additionally, the housing units are organized in a manner to mitigate sexual abuse from occurring. The supply closets were not located on the housing units and the layout is in a manner that allows for staff to clearly see into the cells from nearly all areas, without violating the mandate against opposite gender staff being able to view inmates using the restroom on unit showers. The cleaning supplies are brought onto the unit on a cart and removed when not needed. The Auditor found the overall layout of the housing units provided above average line-of-site which can deter sexual abuse from occurring on unit and in cell.

The composition of the inmate population is also taken into account in the Staffing plan. The facility prohibits all female and male inmates from interacting in any manner. This was observed during the onsite Audit as purposeful separation of male and female inmates appeared to be well coordinated. In addition, the operation is broken down into custody levels that are separated by housing units. The number and placement of supervisory staff is based on the need for increased supervision in Custody level 3 and Specialized housing unit.

The staffing plan takes into consideration inmate movement by shift and time of day including the Institutional programs. The facility is audited by the Federal Government and State to ensure compliance with laws, regulations, or standards; The facility did not have any substantiated, nor unsubstantiated, incidents of sexual abuse; but PREA Coordinator and Warden interviews affirmed that any allegation that met this definition would be mitigated immediately and factored into to a new Staffing Plan.

Interviews with the PREA Coordinator, Warden, and Random staff confirmed that voluntary and mandatory overtime was routinely used to mitigate staff call offs to ensure the staffing levels were never below the minimum outlined in the Staffing

plan. In turn, all shifts' positions are filled, thus the staffing plan has not been deviated from in the last 12 months (and prior). The staffing plan is adhered to and evaluated each year (or sooner if security issues arise) to adjust for overall security of the facility. Random staff interviews (male and female officers) both affirmed that at minimum one female staff member is on shift at all times and female staff are mandated to meet the female pat search expectation.

**SOP 1001.2 addresses 115.13 d and was further verified during the onsite audit, document reviews, and staff interviews.**

During the onsite Audit this Auditor did verify that the Sergeant position is an intermediate-level supervisor position that conducts and documents unannounced rounds to identify and deter staff sexual abuse and sexual harassment. These rounds occur on all shifts and were spot checked by a review of unit logs while the auditor, and assistant, were touring the facility on December 4, 2023. Interviews with the PREA Coordinator, Warden, and Sergeants confirmed that there is a policy to prohibit staff from alerting other staff members that any supervisory rounds are occurring. The only alert that occurs is to the Control Center to open the doors at the immediate time of the round. The interviews with the Sergeant noted that if any staff would violate this prohibition regarding notifying it would be immediately addressed with staff and could lead to discipline.

**SOP 1001.2 addresses 115.13 d**

*III. PROCEDURE*

*D. Movement Control*

*1. All access to the facility and movement within the secure perimeter will be monitored and controlled by Central Control.... Central Control operators are prohibited from alerting other staff members that a supervisor is conducting rounds.*

115.14	Youthful inmates
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1904 addresses 115.14</b></p> <p><i>II. PROCEDURES</i></p> <p><i>D. The Shift Commander will:</i></p> <p><i>6. Ensure that new commitments are eighteen (18) years of age or older. Commitments under the age of eighteen (18), will be denied unless they are appropriately charged as an adult. SOP 2501 Juveniles Charged as Adults and 2502 Juveniles Charged and Confined as Adults, will be adhered to. If a juvenile is</i></p>

*committed to the facility, they will be immediately placed on a Constant Watch Observation and housed alone. The County of Pike may request an emergency 5B transfer to the State to house this inmate.*

**Onsite and Interviews**

During the onsite audit it was determined that the facility does meet the standards outlined in 115.14 but needed a more formalized written policy on how to routinely manage any inmate under 18 even if they are sentenced as adults. This was completed and the new policy was appropriate. Interviews coupled with onsite documentation reviews, showed that the facility only had one under 18 inmate in the past 12 months. The intake officers, treatment staff, medical staff, and administrative staff all confirmed that the youthful offender was there approximately 24 hours and was kept in the Intake area, celled alone, and placed under constant watch by a designated officer until he could be transferred out. There were no youthful inmates housed at the facility during the onsite audit.

<b>115.15</b>	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.15</b></p> <p><i>IV. GENERAL INFORMATION</i></p> <p><i>A. General Information</i></p> <p><i>1. Officers will not search inmates/detainees of the opposite sex except under exigent circumstances unless approved by the Shift Commander. If this situation arises staff will document this incident thoroughly.</i></p> <p><b>SOP 1012.16</b></p> <p><i>I. POLICY</i></p> <p><i>The Pike County Correctional Facility recognizes that the use of these searches may, under certain conditions, be necessary to ensure the safety of staff, civilians, and inmates/detainees. Searches shall be conducted only with proper authority and justification, and in accordance with the procedural guidelines for conducting searches as set forth in this policy. Body cavity searches must be performed by a Licensed Physician at a hospital; at no time will staff be authorized to conduct a body cavity search. Transgender or intersex inmates/detainees will not be searched or physically examined solely to determine their genital status. Whenever possible, medical personnel shall be present to observe the unclothed search of a transgender detainee.</i></p>

### III. PROCEDURES

#### A. Pat Search/Metal Detector Screening:

2. Staff members of the same sex as the inmate/detainee shall conduct pat searches whenever practical. Only under exigent circumstances will cross gender pat searches be conducted. Upon completion of a cross gender pat-down search, a incident report will be completed and forwarded to the Shift Commander.

#### III Procedures

#### C. Unclothes Searches

5. Inmate/detainees will not be searched or physically examined to determine the inmate/detainee's genital characteristics. If an inmate/detainee's gender is unknown, it may be determined during conversations with the inmate/detainee, by reviewing medical records, or if necessary, during the initial medical booking process.

#### **115.15 d is addressed in the housing unit operations SOP**

Male and Female Post orders, under the *General Information* section this is addressed: Per PREA and ICE Standards it is to be announced when an individual of the opposite gender is coming onto the unit.

#### **Onsite Observations and Interviews:**

To ensure compliance with Zero Tolerance all areas where inmates had access where thoroughly inspected. Before the walking tour began, overall camera coverage of the facility was evaluated at both the Administration work stations and the Closed-Circuit Camera Room. There are 2 observation cells at the facility that were not directly viewable from either camera system access points, instead the cells are in-person monitored by cisgendered security staff. The cells do have camera coverage, but only record so the video can be recalled if needed for an emergency or investigation. The video feeds in these areas also used digital blocking over the toilets. The tour included all General population housing unit, Specialized housing units, the Protective Custody unit, and the Restricted Housing Unit. Other areas toured including all outside and inside recreation areas, the Counseling/Religious programs corridor, Intake/Reception processing, medical department, administrative area, Central Kitchen, and the Visiting Room.

In regard to the Visiting room areas, the facility does not allow contact visits, aside from legal or specialized professional visits. The visiting room tour showed that inmates did not need to be strip searched in order to participate in the visits. Inmates participating in a legal, or specialized professional visits, can be body scanned by a cisgendered staff member in lieu of strip search, as long as the body scan is clear.

The overall need for strip searches is mitigated with the body scanner technology, which is cisgender viewed. If a need arises for a strip search, the search must be approved by the Shift commander. If approved, the search will be conducted by a cisgender staff member in the designated area within the Intake/Reception area. This

location is behind closed door and provides privacy for the inmates (no camera nor cross gender viewing) and camera coverage (views staff only, not the inmates) for staff safety.

Housing units were arranged in a manner that allowed to 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). The physical layout of the unit, and specifically the cells arrangement, is optimal to minimize potential abusers' opportunities to pressure/intimidate/coerce potential victims. The cells use an open bar framed door that allows uninterrupted view into the cell from most angles within the unit. Each cell has a toilet that is recessed from direct line of sight faces rearward so that inmates can use the toilet without being exposed to cross gender staff. The toilet layout is in such a manner that the person on the toilet would not be viewed but any other person in the space could be viewed, further deterring Sexual abuse. The cleaning utilities are stored off unit and located on mobile carts to eliminate blind spots in cleaning closets. The Showers are located in sight of the officer's station and the feet areas are exposed so that the officers can assure only one inmate is in the shower at one time.

During the tour, the auditing team took notice that when a cross-gender person entered any housing unit, an announcement was made. The auditor, and assistant, randomly ask inmates on the unit if staff made announcement. All of the inmates indicated that either the staff who enters makes the announcement or one of the regular officers did. Inmates also acknowledged that they were aware of an onsite audit occurring at the facility. Posters were present on the housing unit regarding this onsite audit.

Fifteen (16) Random IM interviews were conducted spanning all housing units (including male and female inmates) and 5 Random Staff Interviews spanning all shift (including both males and female officers). Inmates noted staff consistently made cross-gender announcement and staff affirmed that cross gender announcement were mandatory and occurred on a regular basis. There was one Transgendered inmate identified during the audit, but the person preferred to not be identified/outed to the facility. The person was gender conforming and did not wish to make their gender identity known to staff. She did not indicate that staff were aware of her gender identity and was not treated any different than a cis-gender male during searches and body scans.

Random staff interviews (confirmed with training records) showed that the staff members were twice annually trained on how to conduct cross-gender pat-down searches and searches of transgender/intersex inmates in a professional/respectful manner. Further, staff did articulate that they never conduct searches of transgendered inmate solely to determine genital status. Staff were not aware of any Transgender inmates on the compound currently. Intake staff, noted that if genital status was questionable due to contradictions during the body scan, documentation review, statements by the inmate, or noted in the intake medical assessment the shift commander would be notified in order to assess the safest housing assignment for

	<p>the inmate.</p> <p>Male/Female inmates and Male/Female staff members all affirmed that only cisgender searches occurred. In regard to female inmates' searches occurring, inmates and staff further affirmed that only females searched female inmates (which is also true in regard to male inmate searches being conducted by male staff). Male and Female staff, as well as supervising staff members, all noted that at minimum there must be one female officer on shift at all times. Female specific mandates are used to meet this requirement to ensure that female inmates are not prohibited from out of cell, nor off unit activities due to a lack of female staff members.</p> <p>Operational shifts at Pike County Correctional facility are as follows: First Shift (overnight shift) is defined as 2255 to 0730hrs. Second Shift (daytime shift) is defined as 0655 to 1530hrs. Third Shift (evening shift) is defined as 1455 to 2330hrs. One randomly selected Male and Female staff member from Second and Third Shifts were interviewed (2 per shift) and one Female First Shift staff member was interviewed.</p> <p>Administration, training documents, and additionally confirmed by staff interviews, showed that the shift overlap allows the facility to have continuous training opportunities throughout the year. Policies and procedures are reviewed at minimally twice annually including PREA SOP 1517 and Search Procedures 1012.16.</p>
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<b>115.16</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.16 a-c</b></p> <p><i>IV. GENERAL INFORMATION</i></p> <p><i>A. General Information</i></p> <p><i>1. Sexual abuse and harassment information (prevention, detection and responding) will be provided to inmates/detainees who are not fluent in English, or are disabled or needing general assistance after completing a request to their housing unit counselor.</i></p> <p><i>2. Pike County Correctional Facility shall not rely on inmate/detainee interpreters, inmate readers, or other types of inmate/detainee assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmates/detainees safety or the investigation of the inmates/detainees allegations.</i></p> <p>Additionally, the facility provided the language information used to mitigate interpretation needs of staff is not available immediately onsite. The language line was available regardless of onsite staff interpreters.</p>

	<p><b>Onsite and Interviews</b></p> <p>During the tour the auditor observed that units had ample ways for persons with varying disabilities, and language barriers, to have equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The inmates have access to tablets which contain all of the policies which can be translated into various languages if needed. Additionally, there were poster shown throughout the housing units that provided all ICE Civil Commitments with their Consulate phone numbers.</p> <p>Inmate and staff interview showed that inmates (regardless of their barriers to communicate) were provided mitigation to address their needs and ensure they had the ability to receive and understand the PREA policies and reporting means. Staff interpreters were available to translate for the interview and a language line was also available to use if the language was not able to interpret onsite. All staff and inmates interviewed indicated that inmates were never used for interpretation of any sexual abuse or harassment reports. Staff indicated that they do not allow any inmate to interpret for others unless the information is innocuous (asking for toilet paper, writing tools, etc...) or there was an emergency that imminently needed life saving measures.</p> <p><b>Inmate Targeted Interviews:</b></p> <p>A Unit 1 Hearing impaired, 1 Developmentally disabled.  E Unit 1 Physically disabled  K Unit 1 Limited English</p>
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<b>115.17</b>	<b>Hiring and promotion decisions</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p><b>Auditor Discussion</b></p> <p><b>SOP 1517</b></p> <p><i>IV General Information</i></p> <p><i>A. General Information</i></p> <p><i>13. The Pike County Correctional Facility will not hire, promote or contract with anyone (that will have direct contact with inmates/detainees) who has engaged in, been convicted of, or been civilly or administratively adjudicated for engaging in sexual abuse in a prison, jail, lock up, community confinement facility, juvenile facility, or other institution or 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. The Pike County Correctional Facility will conduct criminal background checks, conduct a</i></p>



*check of the state's child abuse registry, and make its best efforts to contact prior institutional employers to obtain this information on substantiated allegations of sexual abuse, or any resignations during a pending investigation of an allegation or sexual abuse.*

**Onsite, Document Reviews, and Interview**

During the onsite audit, thorough documentation reviews, and an interview with a Human Resources staff it was determined that the facility does not hire, promote, or enlist the services of contractors nor volunteers who may have histories of sexual abuse or sexual harassment. New employees, contractors, volunteers, and promotions are required to respond to questions regarding whether they have ever engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution, 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 has been civilly or administratively adjudicated to have engaged in such activity. The application process specifically requires the applicant for the position to sign a release of information for past employers and notes that if permission is not granted, they will not be eligible to proceed in the process. Additionally, the end of the application informs the applicant that any information provided in the application that any misstatement of fact may result in disqualification or termination.

This auditor reviewed applications of new hires, new contractors, new volunteers, and recent promotions and confirmed that all had been vetted appropriately before they were offered the positions.

Human Resources does 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. There have not been any inquiries in the past 12 months where the former/current employee engaged any of the conduct outlined in 115.17 h.

Human Resources and the Administration confirmed that all staff, contractors, and volunteers are uploaded into the Pennsylvania Justice Network (JNET). This system has a feature that allows Human resources staff to subscribe to real-time event messages for comparison against offender watchlists. When an event message is published, it is compared against watchlist records, and the subscriber is automatically notified via email. When a significant event such as an arrest, disposition, want, warrant, state parole violation, PennDOT change of address or death occurs, users are alerted to check secure JNET for detailed event information. This system meets the requirements outlined in 115.17 e. The use of the JNET system for all staff, contractors, and Volunteers exceeds the standards minimal requirements.

	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>During the onsite audit, and confirmed with the Warden and PREA Coordinator interviews, the facility has not had any changes since the last PREA Audit. They did affirm that if/when the facility has any substantial expansion or modifications, the agency will consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse. Additionally, there has not been any changes to the video monitoring system, electronic surveillance system, or other monitoring technology. Again, the Warden and PREA Coordinator affirmed that the facility does consider how such technology may enhance the agency's ability to protect inmates from sexual abuse.</p> <p>Currently the facility has a camera system that is comprised of both digital and analog video feeds. The video is monitored by staff and stored so it can be recalled back 45 to 60 days. The facility also uses the Guardian Pipe system to ensure rounds are being conducted in compliance with policy and procedure. The system can be monitored to alert Administration if any staff member is not conducting appropriate rounds. This feature further deters sexual abuse and/or harassment of inmates by holding staff accountable to the minimum standard for security rounds.</p>

<b>115.21</b>	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.21</b></p> <p><i>III. PROCEDURE</i></p> <p><i>Medical Staff will:</i></p> <p><i>2. Coordinate with the Shift Commander to arrange for a transport to Wayne Memorial Hospital for forensic medical examinations without cost to the inmate/detainee. Treatment services will be provided regardless of whether or not the victim names the abuser or cooperates with any investigation arising out of the incident. Exams should be performed by sexual assault forensic examiners (SAFE's) or sexual assault nurse examiners (SANE's). In the event that a SAFE or SANE is not available, a qualified medical practitioner will conduct the exam and staff will document on an incident report.</i></p> <p><i>6. ...A victim advocate from (VIP) is to be made available to accompany the victim through examinations and interviews.</i></p> <p>The Victims Intervention Program (VIP) MOU outlines services for victims both at the</p>

time of incident/transport to hospital, and follow-up.

### *III. PROCEDURE*

*Shift Commander will:*

*1. Ensure separation of the victim and alleged assailant at the time of notification. Ensure victim receives timely unimpeded access to emergency medical treatment and crisis intervention services.*

*Note: ...An internal administrative investigation will be immediately initiated. If the investigation reveals evidence of staff misconduct, the staff member will be scheduled for an investigatory interview and the Pennsylvania State Police will be notified if there is evidence of a crime. ...*

*The Warden, PREA Coordinator / (PSA) Prevention of Sexual Assault Compliance Manager or designee will:*

*1. Notify the Pennsylvania State Police to conduct an official investigation. The PREA Coordinator in the roll of the Facility Investigator will keep in contact with the Pennsylvania State Police Investigator regarding the progress of all sexual abuse investigations. The Facility Inspector will contact the Pennsylvania State Police Investigator bi-weekly to attain updates on the status of sexual abuse investigations.*

**SOP 1012.9 addresses 115.21 a 4- The policy in whole meets the uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.**

### *I. POLICY*

*The Pike County Correctional Facility shall establish a strict system for the collection and preservation of evidence (Chain of Custody). The goal of this system will be to create a safe and secure record of the collection, safe storage, transfer, processing, and disposal of any physical property that may be used as evidence in any disciplinary hearing, court hearing, or trial.*

### **Law Enforcement**

Pennsylvania State Police (PSP) is the state's primary law enforcement agency and follows the requirements of paragraphs (a) through (e) of this section. The facility has a Liasson with the local PSP office and communicates with them weekly for all Sexual Abuse and Criminal cases.

### **Onsite and Interviews**

During the onsite Audit, Staff it was determined that there were no sexual abuse allegations that required access to outside services including SAFE/SANE and Victims Advocacy to go to the hospital. Interviews with the PREA Coordinator noted that if a Victims Advocate was not available (for any reason) at the time of the alleged Sexual Assault, a Clinical staff member (Nurse/Psych) who did not have any substantiated Sexual Abuse/harassment allegations would accompany the inmate inmate to the

outside hospital. The facility does have an MOU with a Victims Intervention Program (an Advocacy group) and this group will work with the inmates for Onsite counseling, at the hospital, and throughout the criminal justice process if necessary.

Flier and posters were available to the inmates throughout the facility and the Victims Intervention Program (VIP) was outlined in the Inmate Handbook and handouts. Additionally, the policies, procedures, and information are available on the Inmates tablets. During the onsite tour multiple inmates were willing to show the auditor their tablet screens and navigate to the desired materials. The inmates have unrestricted access to this information throughout the day.

**IM Handbook page 17**

*Section 10: Sexual Assault/Harassment*

- *Contact (VIP) Victims Intervention Program Advocate Group*
  - o *Address: 107 West High Street Milford PA 18337*
  - o *Phone: (570) 253-4401 (Wayne)*
  - o *Phone: (570) 296-4357 (Pike)*

Inmates are all issued an inmate handbook, and the document is available on their tablets for immediate access. Targeted Interviews with inmates who had previously been sexually victimized, and on the spot interviews, determined that inmates were aware about the VIP group and how they could find the contact information.

The Prime Care Memo indicates that the facility does not have an MOU with the hospital but does have a designated liaison that is in routine communication in order to establish that services remain available to the Pike County Inmates and detainees. This communication occurs between Wayne County Hospital and Prime Care staff, at Pike County Corrections, at minimum every six months.

<b>115.22</b>	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.22</b></p> <p><i>IV. GENERAL INFORMATION</i></p> <p><i>A. General Information</i></p> <p><i>B. Investigation</i></p> <p><i>1. The Pike County Correctional Facility is responsible for investigating allegations of</i></p>

*sexual abuse and sexual harassment. All allegations will be investigated promptly, thoroughly and objectively by facility investigators who received special training in sexual abuse investigations in confinement settings. ...If criminal activity is determined by the facility investigator, the Pennsylvania State Police will be contacted...All information will be forwarded to the Pennsylvania State Police for possible criminal charges. The investigators memorandum will include their referral to the State Police for possible criminal charges...*

*10. Administrative follow up:*

*a. Administrative investigations will include an effort to determine whether staff actions or failures to act contributed to the abuse. They will be documented in written reports and include a description of the physical and testimonial evidence, the reasoning behind credibility assessments and investigative findings. ...*

*b. Criminal investigations will be documented in a written report and will contain a thorough description of physical, testimonial, and documentary evidence and attached copies of such where feasible. Substantiated allegations of criminal conduct will be referred for prosecution.*

**Onsight, document review, Website review, and interviews**

The Pennsylvania State Police (PSP) is the primary law enforcement agency in Pennsylvania and meet the requirements outlined in 115.22 d and e. Their practices are compliant with the standard as part of the PA Department of Corrections MOU for all State Correctional Facilities.

There was only 1 Sexual Abuse allegation that met the definition in the in this last 12 months and this allegation was unfounded. There were no unreported/uninvestigated allegations brought to light by staff, inmates, documentation review, nor letters to the PREA Auditor at the mailbox provided on the Pre-Audit posters.

SOP 1517 PREA policy is published on the Pike County Correctional Website at:  
[https://www.pikepa.org/courts\\_\\_law/correctional\\_facility/downloadable\\_documents.php#outer-94](https://www.pikepa.org/courts__law/correctional_facility/downloadable_documents.php#outer-94)

The Policy's full name and reference is:

Series: Health Care  
 Subject Sexual Misconduct/Assault

Reference(s): ACA 4-ALDF 4D- 22, 26; N.C.C.H.C. P-55-J-55; Prison Rape Elimination Act of 2003

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

## **SOP 1517 addresses 115.31**

### *IV. GENERAL INFORMATION*

#### *D. PREA Training/Cross Agency Training*

*1. Specialized Investigator Training: The Pike County Correctional Facility will ensure that in addition to general training provided to all employees, the facility has certified PREA investigators that receive specialized training in conducting sexual abuse investigations.*

*2. All Pike County Correctional Facility staff is trained in searches, the Professional Image, Professionalism, and Ethics and Interpersonal Communication Skills during basic training. PREA, sexual abuse and harassment are covered at least twice a year during shift briefings.*

*3. PrimeCare Medical staff are trained in: how to detect and assess signs of sexual abuse/harassment, how to preserve physical evidence, how to respond effectively and professionally to victims, how and to whom to report allegations or suspicions of sexual abuse, zero tolerance policy, prevention, response, inmate/detainee right to be free from sexual abuse/harassment, free from retaliation for reporting, dynamics of abuse/harassment in confinement, common reactions., avoiding inappropriate relations with inmates/detainees, communicating with all inmates/detainees regardless of race, gender, sexual preference, complying with mandatory reporting laws. PrimeCare Medical staff does not use volunteer medical or mental health care practitioners.*

*4. The local ICE office trained investigators will receive Cross Agency training through a PowerPoint presentation. The Cross Agency training will include what is expected of the ICE trained investigators and the facility trained investigators regarding all incidents of PREA involving a detainee.*

#### **Onsite, document review, and Interviews**

During the onsite tour staff were asked questions related to prevention, detection, and responding to allegations/indications of Sexual Abuse and/or Harassment of inmates/detainees. Staff were very aware that every allegation required immediate notification to the Shift Commander and an investigation would be conducted.

Training Coordinator confirmed that all Staff, Contractors and Volunteers were trained prior to having contact with inmates. He indicated that all Staff, Contractors, and Volunteer had to pass a test to show they understood the training received. During the onsite audit this auditor reviewed training files for Contractors and Volunteers. Sample documents were provided to show that this occurred.

The random staff targeted interview, and spot check interviews with staff during the tour, showed that the facility adequately trained them to prevent, detect, and respond to Sexual Abuse and/or Sexual harassment allegations.

<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.32</b></p> <p><i>IV. GENERAL INFORMATION</i></p> <p><i>E. Visitors/Contractor/Volunteer Training:</i></p> <p><i>1. All contractors and volunteers that have contact with inmate/detainees will be notified of the zero-tolerance policy regarding sexual abuse/harassment and directed on how to report sexual abuse. Training will include the prevention, detection, and any response to sexual abuse/harassment. If an allegation of sexual abuse arises involving a contractor or volunteer, said individual will be removed from detainee contact pending the outcome of this investigation.</i></p> <p><b>Onsite, document review, and Interviews</b></p> <p>During the onsite tour random contract staff was asked questions related to prevention, detection, and responding to allegations/indications of Sexual Abuse and/or Harassment of inmates/detainees. Staff were very aware that every allegation required immediate notification to the Shift Commander and an investigation would be conducted.</p> <p>Training Coordinator confirmed that all Contractors and Volunteers were trained prior to having contact with inmates. He indicated that all Staff, Contractors, and Volunteer had to pass a test to show they understood the training received. During the onsite audit this auditor reviewed training files for Contractors and Volunteers. Sample documents were provided to show that this occurred.</p> <p>The contractor formal interview, and spot check interviews with contractors, showed that the facility adequately trained them to prevent, detect, and respond to Sexual Abuse and/or Sexual harassment allegations.</p>

<b>115.33</b>	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>IM Handbook is issued to all inmates at intake:</b></p> <p><i>PIKE COUNTY CORRECTIONAL FACILITY INMATE/DETAINEE HANDBOOK</i></p> <p><i>Section 10: Sexual Assault/Harassment</i></p>

*The Pike County Correctional Facility has a “ZERO TOLERANCE” policy pertaining to sexual activity, harassment, and sexual assault. Sexual contact is strictly forbidden whether it is consensual or non-consensual. Intimate relationships amongst offenders or between offenders and staff are also strictly forbidden. Inmates/detainees will not be punished for truthfully reporting sexual abuse or signs of sexual abuse observed. Staff members are prohibited from retaliating against any Inmate/Detainee or staff who reported such incidents.*

*Medical Staff will provide information to offenders during their initial examination about sexual assault/abuse and harassment. This information will include methods of prevention and intervention, self-protection, reporting sexual assault/abuse, treatment, access to outside victim advocates or rape crisis organizations (addresses and telephone numbers) and counseling.*

*Inmates/detainees who have been victimized, sexually harassed, or sexually assaulted or inmates/detainees who witness the same are encouraged to immediately report such activities. Inmates/detainees may report these actions by following one of the following procedures:*

*Notify your Housing Unit Officer.*

- Filing a written or kiosk request to speak to your Housing Unit Counselor.*
- Filing a written or kiosk request to speak to a Shift Commander.*
- Filing a written or kiosk request to speak to the facility nurse.*
- Write a letter to the U.S. Marshal or Office of Inspector General.*
- Filing a written or kiosk request for an emergency grievance.*
- Calling the Office of Inspector General.*
- Contact (VIP) Victims Intervention Program Advocate Group*

*o Address: 107 West High Street Milford PA 18337*

*o Phone: (570) 253-4401 (Wayne)*

*o Phone: (570) 296-4357 (Pike)*

*a. Inmate/detainee on inmate/detainee sexual assault will be separated into two categories.*

*1. Nonconsensual Sexual Acts:*

- Contact of any person without his or her consent, is coerced into such act by overt or implied threats of violence or of a person who is unable to consent or refuse: and contact between the penis and the vulva or the penis and the anus including penetration, however slight; contact between the mouth and the penis, vulva, or anus; and penetration of the anal or genital opening of another person, however so*



*slight, by hand, finger, object or other instruments.*

## *2. Abusive Sexual Contacts:*

*· Contact of any person without his or her consent, is coerced into such act by overt or implied threats of violence or of a person who is unable to consent or refuse and intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person, excluding contact incidental to a physical altercation.*

*· Exclude incidents in which the intent of the assault is to harm or debilitate rather than to sexually exploit.*

*b. Staff on inmate/detainee sexual misconduct includes behavior or an act of a sexual nature directed toward an inmate/detainee by an employee, volunteer, contractor, official visitor or agency representative. Sexual relationships of a romantic nature between staff and inmates/detainees are prohibited. This includes conversations or correspondences of a romantic or sexual nature.*

*Consensual or nonconsensual sexual acts including:*

*· Contact between: the penis and the vulva or the penis and the anus, including penetration, however slight; the mouth and the penis, vulva, or anus; the mouth and any body part where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire.*

*· Penetration of the anal or genital opening, however slight, by a hand, finger, object or other instrument, that is unrelated to official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire.*

*· Any other intentional contact, either directly or through the clothing, of or with the genitalia, anus, groin, breast, inner thigh, or the buttocks that is unrelated to official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire.*

*· Any attempt, threat or request by a staff member, contractor, or volunteer to engage in the activities described in A - C of this section.*

*· Any display by a staff member, contractor, or volunteer of his or her uncovered genitalia, buttocks, or breast in the presence of any inmate/detainee.*

*· Voyeurism by a staff member, contractor, or volunteer.*

*c. Sexual harassment includes repeated and unwelcome sexual advances, requests for sexual favors, or gestures, or actions of a derogatory or offensive sexual nature by one inmate/detainee to another, verbal comments, and repeated profane or obscene language or gestures of a sexual nature to an inmate/detainee by an employee, volunteer, contractor, official visitor, or other agency representative including demeaning references to gender, sexually suggestive or derogatory comments about*

body or clothing.

*d. Investigation:*

*All allegations will be investigated promptly, thoroughly and objectively by facility PREA investigators who received special training in sexual abuse investigations in confinement settings. They will interview alleged victims, suspected perpetrators and witnesses and review prior complaints and reports of sexual abuse involving the suspected perpetrator. If criminal activity is determined by the facility investigator, the Pennsylvania State Police will be contacted. The facility investigator will inform the inmate/detainee if their allegations of sexual abuse are determined to be substantiated, unsubstantiated, or unfounded and if inmate/detainee on inmate/detainee sexual activity was consensual. A report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred will not result in lying charges, even if the allegations are found unsubstantiated.*

**Onsite, Interviews, and document review**

During the tour the auditor observed that units had ample ways for persons with varying disabilities, and language barriers, to have 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. All inmates have access to tablets which contain all of the policies which can be translated into various languages if needed. Additionally, there were poster shown throughout the housing units that provided all ICE Civil Commitments with their Consulate phone numbers.

At Intake all inmates receive an inmate handbook and ICE Civil Commitments additionally receive a National Detainee Handbook which contains detailed information regarding the prevention, detection, and response to Sexual Abuse and Harassment.

Inmate and staff interview showed that inmates (regardless of their barriers to communicate) were provided mitigation to address their needs and ensure they had the ability to receive and understand the PREA policies and reporting means. Staff interpreters were available to translate for the interview and a language line was also available to use if the language was not able to interpret onsite. All staff and inmates interviewed indicated that inmates were never used for interpretation of any sexual abuse or harassment reports. Staff indicated that they do not allow any inmate to interpret for others unless the information is innocuous (asking for toilet paper, writing tools, etc...) or there was an emergency that imminently needed life saving measures.

Documents reviewed onsite, and samples sent showed, that the inmates are given an inmate handbook (and the National Detainee Handbook if Civil Detainee) at intake. These publications specifically address how to report incidents or suspicions of sexual abuse or sexual harassment. Additionally, within 30 days of arrival the information is gone over by staff with the inmates. Finally, all inmates have tablets that have the same information contained on them. This auditor did spot check interviews with inmates on the housing units, and they could show me how to access the information on the tablets. Inmates demonstrated a strong knowledge of PREA reporting

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.34 a-c</b></p> <p><i>IV GENERAL INFORMATION</i></p> <p><i>B. Investigation</i></p> <p><i>1. The Pike County Correctional Facility is responsible for investigating allegations of sexual abuse and sexual harassment. All allegations will be investigated promptly, thoroughly and objectively by facility investigators who received special training in sexual abuse investigations in confinement settings. The specialized training will include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collections in confinement settings and the criteria and evidence required to substantiate a case for administrative action or prosecution referral...</i></p> <p><i>D. PREA Training/Cross Agency Training</i></p> <p><i>1. Specialized Investigator Training: The Pike County Correctional Facility will ensure that in addition to general training provided to all employees, the facility has certified PREA investigators that receive specialized training in conducting sexual abuse investigations.</i></p> <p>The Pennsylvania State Police (PSP) is the primary law enforcement agency in Pennsylvania and meets the requirements in 115.34 e.</p> <p><b>Onsite, Interview, Documentation</b></p> <p>During the onsite audit Investigation staff including, the PREA Coordinator, were interviewed. Staff confirmed that all persons that conducted administrative investigations were trained by Auditor Patrick Zirpoli before they conducted Sexual Abuse investigations. Additionally, this auditor was provided with completion certificates. The auditor emailed Mr. Zirpoli who confirmed that he did train their staff and he provided the training materials he used to train. There are currently 6 trained staff that can conduct Sexual Abuse investigation. The Modules provided by the trainer were the National PREA Resource Center Special Investigator Training Modules 1-7.</p> <p>Additionally, the PREA Coordinator verified that they do have a Pennsylvania State Police (PSP) Liaison that the investigators communicate with weekly for all State investigations including PREA related matters.</p>

<b>115.35</b>	<b>Specialized training: Medical and mental health care</b>
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**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

**SOP 1517 addresses 115.35 a-d**

*IV. GENERAL INFORMATION*

*D. PREA Training/Cross Agency Training*

*3. PrimeCare Medical staff are trained in: how to detect and assess signs of sexual abuse/harassment, how to preserve physical evidence, how to respond effectively and professionally to victims, how and to whom to report allegations or suspicions of sexual abuse, zero tolerance policy, prevention, response, inmate/detainee right to be free from sexual abuse/harassment, free from retaliation for reporting, dynamics of abuse/harassment in confinement, common reactions., avoiding inappropriate relations with inmates/detainees, communicating with all inmates/detainees regardless of race, gender, sexual preference, complying with mandatory reporting laws. PrimeCare Medical staff does not use volunteer medical or mental health care practitioners.*

**Prime Care PREA Policy**

*II. Policy:*

*All PCM staff should receive annual training on the following topics: how to detect, assess, and respond to signs of sexual abuse and sexual harassment; how to preserve physical evidence of sexual abuse; how to respond effectively and professionally to victims of sexual abuse; ...how to report sexual abuse;...*

**Onsite, Interview, Document Review**

During the onsite review random Nursing staff working in Medical were asked questions pertaining to their training and responding to Sexual Abuse and harassment. The staff were very knowledgeable regarding the zero-tolerance policy, affirmed that they were trained before they started working with inmates, knew that the inmates would go to an outside hospital if they needed SAFE/SANE, and were aware that inmates did not have to pay for Sexual Abuse services. This auditor interviewed contract medical staff who was also a supervisor. She affirmed that she and her staff were trained using the Prime Care Relias Learning materials as well annual training with Pike County. Pike County uses the PREA Sexual Assault Training PowerPoint which covers the mandatory lessons for Medical Mental Health staff. (1) How to detect and assess signs of sexual abuse and sexual harassment; (2) How to preserve physical evidence of sexual abuse; (3) How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and (4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

**115.41 Screening for risk of victimization and abusiveness**

**Auditor Overall Determination:** Exceeds Standard

**Auditor Discussion**

**SOP 1517**

*IV. GENERAL INFORMATION*

*6. Inmates/detainees will receive information concerning the prohibition of sexual contact and steps to take to prevent the likelihood of being victimized by a sexual predator during their initial medical examination and the orientation process. During the initial intake screening, and upon transfer to another facility, all inmate/detainees are assessed for their risk of being sexually abused by other inmate/detainees or sexually abusive towards other inmates/detainees. Inmates/Detainees will not be disciplined for refusing to answer these risk assessment questions. If the facility receives information on the inmate/detainee that during previous confinement they were sexually abused the Warden will be notified as soon as possible, but no later than 72 hours. An incident report will be completed in this matter.*

**SOP 1904**

*I. POLICY*

*The Pike County Correctional Facility shall have a booking procedure in which a new commitment's present mental and physical condition is evaluated. The inmate's/detainee's past criminal conviction/history is documented per JNET; all personal property and valuables are inventoried, documented and secured to prevent loss or misplacement. The inmate/detainee will be communicated to in a language or manner in which they can understand and will receive facility orientation, initial classification, and clothing issue... All new commitments will receive a health care screening performed and recorded by a health care professional within twelve (12) hours of admission.*

**Pike County Screening Tool**

This tool is used at intake, Classification, and Reclassification. It includes all of the mandatory questions under 115.41 d. Any indications of an inmate being high risk for sexual abuse or high risk to sexually abuse others is immediately referred to the shift commander and/or assessed during the Special Needs committee meetings during reclassification.

**Prime Care Screening Tool**

The tool is used immediately following the intake screening and includes an assessment for risk of sexual victimization. The assessment is part of an overall medical evaluation which includes an inmate's mental, physical/developmental disability, age, physical build, previous incarnation, criminal history of violence, prior convictions for sex offenses against an adult or child, if the inmate is or is perceived to be LBGTQI, previous sexual victimization, own perception of vulnerability, and whether the inmate is detained solely for civil immigration purposes.

## **SOP 2002**

### *I. POLICY*

*The Pike County Correctional Facility will employ a classification system to house inmate/detainees according to security risk, behavior, gender, inmate/detainees requiring disciplinary detention, inmate/detainees requiring administrative segregation, potentially suicidal inmate/detainees, and inmate/detainees with mental or physical handicaps. Classification will be used as a management tool to maintain order, security, and safety for all staff and inmate/detainees. Classification procedures will be equitable for all inmate/detainees regardless of race, gender, creed, color or ethnic origin.*

### *B. The Classification Coordinator will:*

*6. After obtaining this scoring information, the Classification Coordinator will assign the appropriate classification level.*

*a. Level 3 - any inmate/detainee scoring in excess of ten (10) points during the classification process. These are inmate/detainees who may exhibit noncompliant behavior and who are likely by virtue of any other verifiable background, sentence, or charge-related factor to present a serious assault, escape, or management risk. Although an inmate/detainee may score in the level 3 range, mitigating factors may result in an override by the Classification Coordinator. These inmate/detainees will be issued red clothing or orange jumpsuit.*

*b. Level 2 - any inmate/detainee with zero (0) to ten (10) points under this system. These are inmate/detainees who do not appear likely to present immediate management problems. These inmate/detainees will be issued orange 2 piece or blue clothing.*

*c. Level 1 -Inmate/detainees committed to the facility with minor criminal records and/or charged with or convicted of nonviolent felonies. These inmate/detainees will be issued orange two piece or blue clothing*

### **Onsite, interviews, and documentation review**

The facility uses a multi-layered approach to evaluate the risk of sexual victimization or abusiveness during reception. The intake officer uses the intake risk screening tool to assess all inmates. This objective tool takes the inmates answers into consideration to evaluate if they are at high risk of abusing others or at high risk to be victimized by others. If the intake officer knows any risk to abuse, or to be victimized, the shift Commander is immediately notified in an appropriate housing assignment will be determined.

Immediately following the intake process, medical conducts a medical screening using the Prime Care Screening tool, which includes both subjective and objective PREA questions. The tool includes overall medical questions and additionally asked the required PREA risk assessment questions outlined in the standards.

If the medical team identifies any risk factors for sexual abusiveness, or vulnerability for sexual victimization, the shift Commander is immediately notified, and appropriate housing assignment will be determined.

	<p>During the initial screening, prior to full classification, the restrictive housing unit can be used for inmates that assess at high risk to abuse and will be evaluated weekly by the Special Needs Team. The facility also has a protective custody unit that is a modified general population unit for inmates at high risk to be victimized, this status will be evaluated weekly by the Special Needs Team.</p> <p>Next, the inmates will be classified within 14 days of the initial medical screening. The classification process additionally includes risk screening for sexual abusiveness and risk for sexual victimization. Once classified, the inmates fall into one of three custody levels lowest risk level 1, medium risk level 2, and high-risk level 3. Inmates that are classified to be at high risk to abuse other inmates will be placed in a level 3 housing unit or can be placed in administrative segregation on the restricted housing units if there is risk that cannot be managed in general population. Inmates that are high risk to be victimized will be placed in a level 1 housing unit or can be placed in a specialized protective custody housing unit if there is a risk that cannot be managed in the level one housing unit.</p> <p>Within the general population "non-specialized" housing unit inmates are celled taking into consideration physical size, history of violence and other factors to mitigate safety. The protective custody housing unit runs similar to a general population housing unit in except that the inmates are single-celled and depending on the risk will be offered to recreate alone.</p> <p>The classification process is repeated multiple times throughout the year to continuously monitor for changes in inmates' risks for Victimization to, and by, other persons. During a 12-month period of incarceration the inmates are assessed at intake, during medical intake, at classification within 14 days after intake, at reclassification 60 to 90 days, at a 90-to-120-day reclassification, and continuously throughout every 90 to 120 days in custody.</p> <p>Risk Assessments are saved in the medical files to limit access by staff and increase confidentiality.</p> <p>The overall process exceeds the standard as it provides a continuous screening process throughout the entirety of an inmates/detainee incarceration.</p>
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<b>115.42</b>	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 2002 addresses 115.42</b></p> <p>III. PROCEDURE</p> <p>d. An inmate/detainee who has partially completed a gender change procedure or</p>

who is at high risk for sexual abuse will be placed in administrative segregation Protective Custody if no other issues warrant administrative segregation pending a review by the facility Doctor and the facility Classification Committee. Any transgender inmate/detainee will be housed alone and will recreate alone pending these reviews.

**Onsite, document review, and interview**

The classification process is repeated multiple times throughout the year to continuously monitor for changes in inmates' risks for Victimization to, and by, other persons. During a 12-month period of incarceration the inmates are assessed at intake, during medical intake, at classification within 14 days after intake, at reclassification 60 to 90 days, at a 90-to-120-day reclassification, and continuously throughout every 90 to 120 days in custody. Transgendered persons are monitored and reassessed more than the standard requires. Classification and reclassification include asking the inmates the questions in the Pike County Corrections Risk Assessment tool.

<b>115.43</b>	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 2002 addresses 115.43</b></p> <p><i>III. PROCEDURE</i></p> <p><i>To ensure for health and safety, physical separation will be maintained between the following categories of inmate/detainees:</i></p> <ul style="list-style-type: none"> <li><i>a. male and female inmate/detainees.</i></li> <li><i>b. general population inmate/detainees.</i></li> <li><i>c. maximum security status inmate/detainees and those who may be preyed upon, violent or harmful to themselves or others.</i></li> <li><i>d. inmate/detainees requiring medical isolation.</i></li> <li><i>e. separation and protective custody inmate/detainees.</i></li> <li><i>f. special needs inmate/detainees.</i></li> <li><i>g. restricted housing (disciplinary status inmate/detainees).</i></li> <li><i>h. suicidal inmate/detainees.</i></li> </ul> <p><i>B. The Classification Coordinator will:</i></p>



1. Obtain and review all seventy-two (72) hour behavioral observation sheets, and the booking observation questions from the classification housing unit.
2. Obtain and review the I.C.E. I-203 form and copy of U.S. I.C.E. detainee classification system primary assessment form.
3. Conduct an N.C.I.C. check and review any information and/or documentation which accompanies an offender upon commitment.
4. The Classification Coordinator or designee will conduct an offender treatment needs assessment within ninety (90) days of admission. This assessment will identify treatment needs which will lead to support and rehabilitative services. Pertinent information obtained during the assessment will be forwarded to facility treatment counselors for follow up, and the treatment needs assessment documents will be placed in the inmates/detainees hard file. Applicable treatment programs and services will be provided to inmates/detainees immediately.
5. Conduct an interview with all new commitments and complete the classification profile worksheet in the Offender Management System as follows: (This profile sheet will be printed and placed in the inmate/detainees hard file).

Factor

Weight (points)

Severity of current offense:

none or low	0
moderate	2
high	5
highest	7
hold for I.C.E./U.S.M.S.	2

Severity of offense is based upon the following scale:

Highest:

*Aiding escape*

*Aggravated battery with deadly weapon*

*Armed robbery (multiple with injury)*

*Burglary with assault*

*Escape (secure facility)*

*Inciting riot*

*Kidnapping*

*Murder (1st, 2nd, degree)*

*Sexual battery (with violence upon a minor)*

*High:*

*Aggravated assault*

*Aggravated battery*

*Aggravated child abuse*

*Arson*

*Battery law enforcement officer*

*Burglary (armed)*

*Extortion*

*False imprisonment*

*False report of bombings*

*Controlled substances (importation, trafficking)*

*Introduction of contraband into detention facility*

*Manufacture of explosives*

*Robbery (armed, strong armed)*

*Sexual battery (other than capital or life felony)*

*Moderate:*

*Armed trespass*

*Burglary*

*Carrying concealed firearm*

*Forgery*

*Grand theft*

*Manslaughter*

*Sale, delivery, possession of controlled substance*

*Tampering with witness*

*Worthless checks (felony)*

*Welfare fraud (felony)*

*Escape (non-secure facility)*

*Low:*

*Driving under the influence*

*Leaving the scene of accident*

*Battery (simple assault)*

*Carrying concealed weapon (other than firearm)*

*Disorderly conduct*

*Gambling*

*Offering to commit prostitution*

*Possession marijuana (misdemeanor)*

*Possession drug paraphernalia*

*Petit theft*

*Trespass*

*Worthless check (misdemeanor)*

*Serious offense history:*

*none or low 0*

*moderate 2*

*high 5*

*highest 7*

*Escape history:*

*no escapes or attempts 0*

*walkaway or failed to return 2*

*escape or attempted escape (closed institution) 7*

*Institutional violence:*

*none or minor 0*

*one or more major 3*

*Disciplinary reports:*

*none in 6 months* 0

*1 in 6 months* 1

*more than 1 in 6 months* 2

*Prior felony convictions:*

*none* 0

*one* 2

*two or more* 4

*Stability factors:*

*under 26 years of age* 0

*age 26 or older* -1

*a. Other factors that may affect classification include, but are not limited to: incarceration status, sentencing status, i.e. receipt of a life sentence or life without the possibility of parole, present psychological state, potential to exhibit assaultive behavior, suicide potential, gang affiliation and needs assessment.*

*If an inmate/detainee is identified as having gang affiliations, the Shift Commander will:*

*1. Offer the inmate/detainee a gang abrogation contract during commitment. The inmate/detainee and Shift Commander will sign the gang abrogation contract and forward it to the Classification Coordinator.*

*2. The Classification Coordinator will then review the contract and sign it. It will then be placed in the inmate/detainees hard file and discussed at the classification meeting.*

*3. Inmate/detainees who have definitive gang affiliation but refuse to sign the gang abrogation contract will be administratively segregated.*

*a. If an inmate/detainee is facing the possibility of a life sentence without parole or the death penalty, they will be classified as Level 3 Maximum Security Status housed alone and will recreate alone; they will additionally be reviewed weekly by the classification committee.*

*b. Any inmate/detainee scoring in excess of 10, will automatically be classified as a level 3 inmate/detainee. In those cases, however, where the inmate/detainee poses no immediate management risk, has no pattern or history of violent assaults, and has not committed one of the following crimes: aided an escape, aggravated battery with a deadly weapon, armed robbery, burglary with assault, escape, incited a riot, kidnapping, murder (first, or second degree), or sexual battery, the Classification Coordinator may initiate an override through utilization of a behavioral contract after*

60 days in custody.

*c. Regarding classification score, the lowest portion of the scale or range is a favorable or positive indicator, while a progressively higher number on the scale indicates a more serious, negative rating.*

*6. After obtaining this scoring information, the Classification Coordinator will assign the appropriate classification level.*

*a. Level 3 - any inmate/detainee scoring in excess of ten (10) points during the classification process. These are inmate/detainees who may exhibit non-compliant behavior and who are likely by virtue of any other verifiable background, sentence, or charge-related factor to present a serious assault, escape, or management risk. Although an inmate/detainee may score in the level 3 range, mitigating factors may result in an override by the Classification Coordinator. These inmate/detainees will be issued red clothing or orange jumpsuit.*

*b. Level 2 - any inmate/detainee with zero (0) to ten (10) points under this system. These are inmate/detainees who do not appear likely to present immediate management problems. These inmate/detainees will be issued orange 2 piece or blue clothing.*

*c. Level 1 -Inmate/detainees committed to the facility with minor criminal records and/or charged with or convicted of nonviolent felonies. These inmate/detainees will be issued orange two piece or blue clothing.*

*d. An inmate/detainee who has partially completed a gender change procedure or who is at high risk for sexual abuse will be placed in administrative segregation Protective Custody if no other issues warrant administrative segregation pending a review by the facility Doctor and the facility Classification Committee. Any transgender inmate/detainee will be housed alone and will recreate alone pending these reviews.*

### **Onsite Audit, Interviews, Document Review**

The facility uses a multi-layered approach to evaluate the risk of sexual victimization, including transgender, or abusiveness during reception. The intake officer uses the intake risk screening tool to assess all inmates. This objective tool takes the inmates answers into consideration to evaluate if they are at high risk of abusing others or at high risk to be victimized by others. If the intake officer knows any risk to abuse, or to be victimized, the shift Commander is immediately notified in an appropriate housing assignment will be determined.

Immediately following the intake process, medical conducts a medical screening using the Prime Care Screening tool, which includes both subjective and objective PREA questions. The tool includes overall medical questions and additionally asked the required PREA risk assessment questions outlined in the standards.

If the medical team identifies any risk factors for sexual abusiveness, or vulnerability for sexual victimization, the shift Commander is immediately notified, and appropriate

	<p>housing assignment will be determined.</p> <p>During the initial screening, prior to full classification, the restrictive housing unit can be used for inmates that assess at high risk to abuse and will be evaluated weekly by the Special Needs Team. The facility also has a protective custody unit that is a modified general population unit for inmates at high risk to be victimized, this status will be evaluated weekly by the Special Needs Team.</p> <p>Next, the inmates will be classified within 14 days of the initial medical screening. The classification process additionally includes risk screening for sexual abusiveness and risk for sexual victimization. Once classified, the inmates fall into one of three custody levels lowest risk level 1, medium risk level 2, and high-risk level 3. Inmates that are classified to be at high risk to abuse other inmates will be placed in a level 3 housing unit or can be placed in administrative segregation on the restricted housing units if there is risk that cannot be managed in general population. Inmates that are high risk to be victimized will be placed in a level 1 housing unit or can be placed in a specialized protective custody housing unit if there is a risk that cannot be managed in the level one housing unit.</p> <p>Within the general population "non-specialized" housing unit inmates are celled taking into consideration physical size, history of violence and other factors to mitigate safety. The protective custody housing unit runs similar to a general population housing unit in except that the inmates are single-celled and depending on the risk will be offered to recreate alone.</p> <p>The classification process is repeated multiple times throughout the year to continuously monitor for changes in inmates' risks for Victimization to, and by, other persons. During a 12-month period of incarceration the inmates are assessed at intake, during medical intake, at classification within 14 days after intake, at reclassification 60 to 90 days, at a 90-to-120-day reclassification, and continuously throughout every 90 to 120 days in custody.</p> <p>Risk Assessments are saved in the medical files to limit access by staff and increase confidentiality.</p> <p>The overall process exceeds the standard as it provides a continuous screening process throughout the entirety of an inmates/detainee incarceration.</p>
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<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.51</b></p> <p><i>I. POLICY</i></p>

*The Pike County Correctional Facility has a “zero tolerance” policy pertaining to sexual assault/abuse and sexual harassment of inmates/detainees. All inmates/detainees and staff have the right to be free from sexual abuse and the right to be free from retaliation for reporting sexual abuse. Consensual sexual activity is prohibited, and does not constitute sexual abuse. All allegations of sexual assault/abuse of inmates/detainees, visitors, contractors, volunteers or employees (verbally, in writing, anonymously, and from third parties) will be immediately investigated by the facilities designated investigators. This procedure will be implemented as soon as a staff member is notified of a sexual assault. Staff is prohibited from revealing information about sexual abuse to anyone other than to the extent necessary. Inmates/detainees can report sexual abuse and harassment or retaliation for reporting by notifying the unit officer, or any other staff member if the housing unit officer is the subject of the complaint, or by notifying a counselor or PrimeCare Medical staff. PREA reporting information is available in tablets on all housing units advising inmates/detainees who wish to write a letter to the US Marshal or Office of Inspector General along with the ability to file an emergency inmate/detainee grievance. Third party reporting information is also provided in the inmate/detainee handbook for family and friends of inmates/detainees incarcerated in the Pike County Correctional Facility. Contact information is also provided in all unit tablets to contact The Victims Intervention Program Advocate Group (VIP) for inmate/detainees who have been victims of sexual assault. This procedure will ensure prompt action is taken to care for and protect the individual alleging to be the victim.*

### *III. PROCEDURE*

*Security Staff notified of or suspecting an alleged sexual assault, abuse or harassment, will privately:*

- 2. Immediately notify the Shift Commander and medical health care personnel.*
- 5. Write a report and forward it to the Shift Commander.*

*All other staff members notified of an allegation of sexual abuse will ensure that the alleged victim does not take any actions that could destroy physical evidence and notify the Shift Commander and their Department Head immediately.*

### *IV. GENERAL INFORMATION*

#### *A. General Information*

*23. All information pertaining to alleged sexual misconduct/assault is strictly confidential and is on a need-to-know basis. Staff members will forward an incident report to the Shift Commander in private.*

#### **Onsite and Interviews**

During the onsite audit the auditor observed that the units had ample ways for persons to report allegations of sexual abuse or harassment. Posters with reporting instructions were in all housing units including the PREA Audit Posters with contact information to write this auditor. The inmates also have access to tablets which

	<p>contain all of the policies which can be translated into various languages if needed. Additionally, there were poster shown throughout the housing units that provided all ICE Civil Commitments with their Consulate phone numbers.</p> <p>During tour this auditor conducted spot check interviews with Civil Detainees and Inmates within their housing units. Detainees and Inmates allowed the auditor to view their tablet screens and showed that they could navigate to policy, procedure, and other pertinent information regarding reporting sexual abuse and harassment.</p> <p>Staff and Inmate interviews indicated that inmates had multiple means to report allegations including sending internal messages to the administration at Pike County Jail (including the PREA Coordinator), inform a staff member, write to or call their Consulate, having a family member report, and the outside agency Victims Intervention Program (VIP). Staff additionally indicated that they could use similar means to report and could also reach out their County Commissioners if they felt it was necessary.</p>
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<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p><b>SOP 1605 addresses 115.52</b></p> <p><i>IV. PROCEDURES</i></p> <p>J. ... All grievances pertaining to sexual abuse/harassment will be rejected from classification and forwarded to the PREA Coordinator immediately upon receipt.</p> <p><b>Onsite and Interviews</b></p> <p>During the onsite, and review of the grievance process, it was determined that all PREA related grievances were immediately flagged by the system and forwarded to the Administration for immediate response and investigation. PREA grievances were not handled different than any other method of reporting. The PREA Coordinator and Warden both recognized the immediate urgency of sexual abuse/harassment allegations and did not allow the allegations to get bogged down in the grievance system. Policy was updated to merely reflect the practice that is being utilized for all sexual abuse/harassment allegations. PREA grievances are immediately rejected and forwarded for response and investigation, as has been the practice under the Warden and PREA Coordinatoren.</p>

<b>115.53</b>	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard



## **Auditor Discussion**

### **SOP 1517 addresses 115.53**

#### I. POLICY

...Third party reporting information is also provided in the inmate/detainee handbook for family and friends of inmates/detainees incarcerated in the Pike County Correctional Facility. Contact information is also provided in all unit tablets to contact The Victims Intervention Program Advocate Group (VIP) for inmate/detainees who have been victims of sexual assault. This procedure will ensure prompt action is taken to care for and protect the individual alleging to be the victim.

Medical Staff will:

6. ...A victim advocate from (VIP) is to be made available to accompany the victim through examinations and interviews.

11. Pike County Correctional Facility will maintain or attempt to enter into agreements with community service providers (VIP) to provide inmates/detainees with confidential emotional support services related to the inmates/detainees sexual abuse while in custody.

12. All services provided will be in a manner that is consistent with the level of care the victims would receive in the community and include pregnancy test and all lawful pregnancy related medical services where applicable.

#### **Onsite, Interviews and Document Review**

All inmates including the ICE Civil Commitments have access to tablets which contain all of the policies which can be translated into various languages if needed.

Additionally, there were poster shown throughout the housing units that provided all ICE Civil Commitments with their Consulate phone numbers.

After conducting interviews with staff, inmates, special investigators, and reviewing documentation, it was determined that only 1 of the allegations the facility received met the definition of sexual abuse outlined in the federal standards which was unfounded.

During the tour, the PREA Coordinator took the Auditing team to where professional visits occurred. VIP counseling sessions are considered professional visits and would be in person in a room with a camera, but no sound for privacy. Inmate phones and tablets listed the extent that the communication would be monitored including monitoring phone calls and email messages.

The facility has an MOU with Victims Intervention Program (VIP) for Rape Crisis services.

During the onsite Audit, Staff it was determined that there were no sexual abuse allegations that required access to outside services including SAFE/SANE and Victims

	<p>Advocacy to go to the hospital. Interviews with staff and the PREA Coordinator it was determined that if a Victims Advocate was not available at the time of the alleged Sexual Assault to work with the inmate, a Clinical staff member (Nurse/Psych) whom did not have any substantiated Sexual Abuse nor harassment allegations would accompany the inmate. The facility does have an MOU with a Victims Intervention Program (an Advocacy group) and this group will work with the inmates for Onsite counseling, at the hospital, and throughout the criminal justice process if necessary.</p> <p>Phones, and notices on the tablets, indicated that the communications could be monitored. If advocates come onsite, they are placed in a professional contact visiting room that has camera coverage but no audio sound.</p>
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<b>115.54</b>	<b>Third-party reporting</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p><b>SOP 1517 addresses 115.54</b></p> <p><i>I. POLICY</i></p> <p><i>...All allegations of sexual assault/abuse of inmates/detainees, visitors, contractors, volunteers or employees (verbally, in writing, anonymously, and from third parties) will be immediately investigated by the facilities designated investigators...</i></p> <p><b>Onsight Audit, Documentation Review, Interviews, Website Review</b></p> <p>During the Onsight Audit, Investigation documentation reviews, staff/inmate interviews, and there were no letters sent to the PREA Auditor mailbox indicating that any allegations of sexual abuse or harassment were not reported or investigated in compliance with these standards. There were no third-party allegations noted in the documentation reviews, staff interviews, or inmate interviews.</p> <p>This auditor did not see in any investigatory files, and there was no indication from staff nor inmate interviews that allegations of Sexual Abuse, Harassment, Retaliation, or violations of PREA policies were not investigated in compliance with the standards.</p> <p>Website review:</p> <p>The SOP 1517 Policy is published on their website at:</p> <p>Pike County, PA (pikepa.org)</p>

<b>115.61</b>	<b>Staff and agency reporting duties</b>
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**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

**SOP 1517 addresses 115.61 a 1-3**

*IV. GENERAL INFORMATION*

*A. General Information*

*1. It is extremely important that the victim of a sexual assault does not wash shower or change clothes.*

*2. It is also extremely important that the crime scene is not disturbed. If the assault took place in a cell, lock the cell door. If it happened in any other area, secure the area in the best possible manner.*

*3. Employees and volunteers will receive awareness training concerning the prohibition of sexual contact with inmates/detainees; inmate/detainee on inmate/detainee sexual contact awareness; and procedures for preventing, detecting, identifying, responding to, resolving, and reporting sexual contact.*

**SOP 1517 addresses 115.61 d**

*I. Policy*

*...Staff is prohibited from revealing information about sexual abuse to anyone other than to the extent necessary.*

*IV. GENERAL INFORMATION*

**SOP 1517 addresses 115.61 e**

*A. General Information*

*18. Allegations of sexual abuse in which the alleged victim is under the age of 18 or considered a vulnerable adult will be reported to designated state or local service agencies. (PDA Mandatory Abuse Reporting (717-265-7887)/Pennsylvania Department of Public Welfare "Childline" (900-932-0313) If a juvenile inmate is committed to the facility they will be placed on a Constant Watch and housed alone. The County of Pike may request an emergency 5B transfer to the state to house this inmate.*

*I. Policy*

*...Third party reporting information is also provided in the inmate/detainee handbook for family and friends of inmates/detainees incarcerated in the Pike County Correctional Facility.*

**Onsite, documentation review, and Interviews**

During the staff interviews it was determined that the staff were aware of their personal responsibility to report any knowledge, suspicion, or information regarding an

	<p>incident of sexual abuse or sexual harassment that occurred in a facility. The interviews also noted that staff were aware that under 18 inmates were considered vulnerable. Staff were also aware there was a prohibition against retaliation against inmates and staff who reported PREA Violations.</p> <p>This auditor did not see in any investigatory files, and there was no indication from staff nor inmate interviews that allegations of Sexual Abuse, Harassment, Retaliation, or violations of PREA policies were not being reported nor investigated in compliance with the standards.</p>
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<b>115.62</b>	<b>Agency protection duties</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p><b>SOP 1517 addresses 115.62 a</b></p> <p><i>III. PROCEDURE</i></p> <p><i>Security Staff notified of or suspecting an alleged sexual assault, abuse or harassment, will privately:</i></p> <ol style="list-style-type: none"> <li><i>1. Separate the alleged victim and abuser if known.</i></li> </ol> <p><b>Onsite Audit, investigation review, and interviews</b></p> <p>The facility had no sexual abuse allegation that was substantiated. This could be attributed to the overall organization and logistical operations at the facility. The cells are laid out in a manner that allows for line of sight into the cells, without violating the cross-gender prohibition against viewing inmates using the toilet/showering. There are no isolated areas on the units (supply/broom closets) and supplies are on rolling carts that can be taken on and off the units as needed. The showers have curtains that are shortened to ensure that only one inmate is in each stall at a time. The inmates only work in areas that have adequate camera coverage. Inmates are do not work with areas that they can have access to isolation including Maintenance. In areas like the Kitchen and laundry there are large glass windows that look into the areas and camera coverage. Restroom, walk in freezers/refrigerators are all locked and inmates are directly supervised by the staff.</p> <p>This auditor did not see in any investigatory files, and there was no indication from staff nor inmate interviews that allegations of Sexual Abuse, Harassment, Retaliation, or violations of PREA policies were not investigated and mitigated in compliance with the standards. All allegations of abuse are immediately investigated by a trained staff member.</p>

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.63 a-c</b></p> <p><i>IV. GENERAL INFORMATION</i></p> <p><i>A. General Information</i></p> <p><i>6. ...If the facility receives information on the inmate/detainee that during previous confinement they were sexually abused the Warden will be notified as soon as possible, but no later than 72 hours. An incident report will be completed in this matter.</i></p> <p><b>SOP 115.61 addresses d</b></p> <p><i>IV. GENERAL INFORMATION</i></p> <p><i>B. Investigation</i></p> <p><i>The Pike County Correctional Facility is responsible for investigating allegations of sexual abuse and sexual harassment. All allegations will be investigated promptly, thoroughly and objectively by facility investigators who received special training in sexual abuse investigations in confinement settings.</i></p> <p><b>Onsight Audit, Documentation Review, and Interviews</b></p> <p>The facility identified that one inmate alleged prior victimization at a correctional facility, but the allegation had already been previously investigated.</p> <p>During the Onsight Audit, Investigation documentation reviews, staff/inmate interviews, and no letters were sent to the PREA Auditor mailbox indicating that any allegations of sexual abuse or harassments were not reported (or investigated) in compliance with these standards. Interviews with PREA Coordinator, Warden, and an Investigatory document review indicated that there was no outside notification required in the last 12 months.</p>

<b>115.64</b>	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.64 a</b></p> <p><i>III. PROCEDURE</i></p>

*Security Staff notified of or suspecting an alleged sexual assault, abuse or harassment, will privately:*

1. *Separate the alleged victim and abuser if known.*
2. *Immediately notify the Shift Commander and medical health care personnel.*
3. *Secure the scene. Photograph/videotape the alleged crime scene.*
4. *Make sure that the inmate/detainee victim and abuser does not shower, wash, brush teeth, urinate, defecate, drink, eat, or change clothing.*
5. *Write a report and forward it to the Shift Commander.*

**SOP 1517 addresses 115.64 b**

*III. PROCEDURE*

*All other staff members notified of an allegation of sexual abuse will ensure that the alleged victim not take any actions that could destroy physical evidence and notify the Shift Commander and their Department Head immediately.*

**Onsite Audit, Documentation Review, and Staff/Inmate Interviews**

During the Onsite Audit, Investigation documentation reviews, staff/inmate interviews, and there were no letters sent to the PREA Auditor mailbox indicating that any allegations of sexual abuse or harassment were not reported or investigated in compliance with these standards.

There were no inmates on site that had reported sexual abuse to interview. It was determined through policy review, Random Staff interviews, and non-security staff interviews that all staff were well versed on first responder duties including: separating the inmates to protect the victim, preserving evidence, requesting the inmate not destroy evidence (eat, drink, smoke, use the restroom, or wash up).

In addition, the facility has an internal system that immediately notifies all Administration if there is any PREA allegation. Once notified the PCO step in immediately to ensure compliance with the standards and initiates/assigns the investigation.

115.65	Coordinated response
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<b>1517 is an Standard Operating Procedure (SOP) and the coordinated response under addresses 115.65 a in the following sections and sub sections:</b>

	<p><i>III. PROCEDURE</i></p> <p><i>Medical Staff will: ...</i></p> <p><i>Shift Commander will: ...</i></p> <p><i>The Warden, PREA Coordinator / (PSA) Prevention of Sexual Assault Compliance Manager or designee will: ...</i></p> <p><i>Supervisor PREA Checklist for Sexual Assault/Harassment Investigation. ...</i></p>
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<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Facility has one labor bargaining agreement with American Federation of State, County and Municipal Employees (ASFME) AFL-CIO District Counsel 87 which is dated June 1, 2023, through May 31, 2023. Additionally, the Facility signed an extension agreement with the aforementioned Union on August 10, 2021. Neither the agreement, nor the extension, limits 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.</p>

<b>115.67</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.67 a-d</b></p> <p><i>IV. GENERAL INFORMATION</i></p> <p><i>A. General Information</i></p> <p><i>1. Staff (medical and mental health staff members) and contractors are required to immediately report to their direct supervisor any of the following:</i></p> <p><i>b) Retaliation against inmates/detainees or staff who reported such an incident;</i></p> <p><b>SOP 1517 addresses 115.67 c</b></p> <p><i>IV. GENERAL INFORMATION</i></p>

*B. Investigation*

*...In addition, the Facility (PSA) along with the Special Needs Committee will monitor the inmate/detainee for a period of not less than ninety (90) days to ensure that no form of retaliation by inmates/detainees or staff take place. Disciplinary reports, housing unit assignments, changes in programs participation, as well as negative performance reviews for reassignments of staff will be reviewed and documented on a weekly basis. The Facility (PSA) and Special Needs Committee will continue this monitoring process beyond ninety (90) days if the need is identified. Upon completion of this process a report will be completed by the Facility (PSA) and be secured in the inmate/detainee file.*

**Onsite Audit, Interviews Staff/Inmates, and documentation review**

Interviews were conducted with the Warden, a member of the Special Needs Team (retaliation, segregated housing, transgender). There were no inmates who reported sexual abuse during the last 12 months onsite and the facility uses a PC GP housing unit for inmates who are at high risk to be victimized (Administrative Segregation is the last resort and has not been used). All interviews indicated that the facility exceeds 115.67 as it meets the standards and provides continuous monitoring for vulnerable inmates throughout their duration in the facility. Unless released, the monitoring will continue for a minimum of 90 days.

The facility conducts a continuous weekly Special Needs Team monitoring strategy with all inmates who are considered high risk to abuse/victimize, those in Segregated Housing (both DC and ADM), those in Protective Custody GP, those who reported abuse/harassment, and any inmates who identifies as transgender. This team also conducts the Sexual Abuse Incident Reviews when they are warranted.

The review committee is comprised at min by the PREA Coordinator, Health Services Administrator, Treatment Counselor(s), Classification Coordinator, and the Director of Behavioral Health.

The monitoring is continuous throughout the inmate's time at the facility and will make necessary changes to programming, custody level increases/decreases, cell moves, and take into consideration the inmate's perception of their safety (this includes Transgender Inmates as well).

<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<b>SOP 1101 addresses 115.68</b> <i>I. POLICY</i>



*The Pike County Correctional Facility shall provide separate housing for inmates/ detainees whose continued presence in the general population poses a threat to self, other inmates/detainees, staff, property or the security of the facility. This includes protective custody status either requested by an inmate/detainee or instituted by staff which is designed to protect an inmate/detainee from potential danger of mistreatment by other inmates/detainees. Involuntary Protective Custody will be assigned only after an assessment of all available housing alternatives has shown that there are no other means of protecting the inmate/detainee.*

**II. PROCEDURES**

**B. Protective Custody**

*Involuntary segregated housing (Protective custody) shall not ordinarily exceed a period of thirty (30) days. In cases where involuntary segregated housing is needed for longer than the initial thirty (30) days, the facility shall review the situation every thirty (30) days to determine if ongoing involuntary segregated housing continues to be needed.*

**Onsite, document review, Interviews**

During the onsite audit the auditor probed about the use of segregation to protect inmates from sexual abuse. Through interviews with staff and inmates, it was determined that the facility does not use segregation units to protect inmates, rather the facility has a protective custody (PC) unit that is a General Population unit where inmates that are at risk from population can be placed. The PC unit is not the first placement option as the Special Needs committee verifies the threat/needs. They then look at cell moves, other housing units, and PC if no other options are present to protect the inmates. The Restrictive Housing Units (RHU) can be used to remove high risk inmates/detainees from an area when an imminent threat is present. In these instances, the Special Needs Committee evaluates the placement on a weekly basis and works to put the inmate in the most appropriate housing unit that can mitigate any threat to other inmates/detainees/

There were no emergent instances whereas inmates who alleged Sexual Abuse needed to be immediately separated from staff or other inmates for their safety.

This auditor did not see in any investigatory files, and there was no indication from staff nor inmate interviews that allegations of Sexual Abuse, Harassment, Retaliation, or violations of PREA policies were not investigated in compliance with the standards.

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

**SOP 1517 addresses 115.71 a-l**

**IV. GENERAL INFORMATION**

**B. Investigation**

1. *The Pike County Correctional Facility is responsible for investigating allegations of sexual abuse and sexual harassment. All allegations will be investigated promptly, thoroughly and objectively by facility investigators who received special training in sexual abuse investigations in confinement settings. The specialized training will include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collections in confinement settings and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The facility investigators will gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data. They will interview alleged victims, suspected perpetrators and witnesses and review prior complaints and reports of sexual abuse involving the suspected perpetrator. If criminal activity is determined by the facility investigator, the Pennsylvania State Police will be contacted. The facility investigators will determine if the alleged sexual assault or harassment claim is to be forwarded as a PREA case or not on a case by case basis. If a sexual abuse claim is made against medical and mental health practitioners, investigators, or a facility administrator, the highest-ranking specially trained investigator will conduct the interview. All information will be forwarded to the Pennsylvania State Police for possible criminal charges. The investigators memorandum will include their referral to the State Police for possible criminal charges.*

4. *When the quality of evidence appears to support criminal prosecution, The Pike County Correctional Facility will consult with prosecutors before conducting compelled interviews.*

5. *The credibility of an alleged victim, suspect or witness is assessed on an individual basis and not determined by the person's status as an inmate/detainee or staff.*

6. *The Pike County Correctional Facility prohibits requiring an inmate/detainee who alleges sexual abuse to submit to a Polygraph examination or other truth-telling device as a condition for proceeding with an investigation into the allegation. A report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred will not result in lying charges, even if the allegations are found unsubstantiated. Inmates/Detainees shall not be disciplined for sexual contact with staff unless there is a finding that the staff member did not consent to such contact.*

7. *The Pike County Correctional Facility will continue to complete an investigation into allegations, even if the alleged abuser or victim has resigned or departed the facility.*

8. *The Pike County Correctional Facility will impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.*

10. *Administrative follow up:*

*a. Administrative investigations will include an effort to determine whether staff actions or failures to act contributed to the abuse. They will be documented in written reports and include a description of the physical and testimonial evidence, the reasoning behind credibility assessments and investigative findings. ...*

*b. Criminal investigations will be documented in a written report and will contain a thorough description of physical, testimonial, and documentary evidence and attached copies of such where feasible. Substantiated allegations of criminal conduct will be referred for prosecution.*

*c. All written reports pertaining to administrative and criminal investigations for sexual abuse/harassment claims will be retained as long as the alleged abuser is incarcerated or employed by the agency plus five years.*

**Onsight Audit, Documentation Review, and Interviews**

During the Onsight Audit, Investigation documentation reviews, Training Records, Investigatory staff interviews, PREA Coordinator Interview, the Warden Interview and there were no letters sent to the PREA Auditor mailbox indicating that any allegations of sexual abuse or harassment were not reported, or investigated, in compliance with these standards. There was one allegation of Sexual Abuse in the past 12 months and this allegation was unfounded and 7 sexual harassment allegations which was unfounded.

Documentation and confirmation from Auditor Mr. Zirpoli showed that all Sexual Abuse investigators at Pike County Prison are trained in compliance with the federal standards.

Interviews with the PREA Coordinator (Lead Investigator) and a subsequent trained investigator coupled with investigatory documentation reviews showed that the investigators were applying the requirements to act immediately, protect evidence, refer Sexual Abuse and Criminal Sexual Harassment Pennsylvania State Police for a criminal investigation. During Administrative investigations, they also noted that they do not exceed the preponderance of evidence standard, never require participation by victim nor ask for polygraph, communicate effectively/professionally with alleged victims, and using credibility assessments for both staff and inmates. Investigators request that all substantiated criminal allegations, by the Pennsylvania State Police be referred, for prosecution.

This auditor did not see in any investigatory files, and there was no indication from staff nor inmate interviews that allegations of Sexual Abuse, Harassment, Retaliation, or violations of PREA policies were not investigated in compliance with the standards. The PREA Coordinator confirmed that there is weekly communication with the PSP liaison weekly for criminal referrals to keep abreast of the progress.

	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.72 a</b></p> <p><i>IV. GENERAL INFORMATION</i></p> <p><i>B. Investigation</i></p> <p><i>8. The Pike County Correctional Facility will impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</i></p> <p><b>Onsite Interviews and Investigatory Documentation review</b></p> <p>Interviews with the PREA Coordinator (Lead Investigator) and a subsequent trained investigator, coupled with investigatory documentation reviews, showed that the investigators were applying the requirements to not exceed the preponderance of evidence standard during the investigation process. Eight (8) Investigator's were reviewed onsite, one of which met the definitions of Sexual abuse, and none violated this section.</p>

<b>115.73</b>	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.73 a-f</b></p> <p><i>IV. GENERAL INFORMATION</i></p> <p><i>B. Investigation</i></p> <p><i>The Pike County Correctional Facility is responsible for investigating allegations of sexual abuse and sexual harassment. All allegations will be investigated promptly, thoroughly and objectively by facility investigators who received special training in sexual abuse investigations in confinement settings...The Facility investigator will inform the inmate/detainee if their allegations of sexual abuse are determined to be Substantiated, Unsubstantiated or Unfounded...</i></p> <p><i>2. If a sexual abuse claim is determined to be Substantiated (The claim has been proven) the Pike County Correctional Facility will inform the inmate/detainee when:</i></p> <p><i>a. The staff member is no longer posted within the inmates/detainees housing unit.</i></p> <p><i>b. The staff member is no longer employed at Pike County Correctional Facility.</i></p>

c. Pike County Correctional Facility learns that the staff member has been indicted on a charge related to sexual abuse within the facility.

d. Pike County Correctional Facility learns that the staff member has been convicted on a charge related to sexual abuse within the facility.

*Note: The Pike County Correctional Facility is not obligated to report this information if the inmate/detainee is released from our custody.*

3. If an inmate/detainee alleges they have been sexually abused by another inmate/detainee, the Pike County Correctional Facility will inform the inmate/detainee when:

a. The Pike County Correctional Facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility.

b. The Pike County Correctional Facility learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

*Note: The Pike County Correctional Facility is not obligated to report this information if the inmate/detainee is released from our custody.*

**Onsite, Document reviews and Interviews**

This auditor did not see in any investigatory files, and there was no indication from staff nor inmate interviews that allegations of Sexual Abuse, Harassment, Retaliation, or violations of PREA policies were not investigated in compliance with the standards. The PREA Coordinator confirmed that there is weekly communication with the PSP liaison weekly for criminal referrals to keep abreast of the progress. There was one sexual abuse allegation that was determined to be unfounded.

Sample notification documents were reviewed and found to be in compliance with the standards.

115.76	Disciplinary sanctions for staff
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<b>SOP 1517 addresses 115.76 a, b, d</b>  <i>IV. GENERAL INFORMATION</i>  <i>A. General Information</i>  <i>1. Allegations of employee or volunteer sexual contact with an inmate/detainee will be investigated immediately. Inmate/detainee complaints alleging sexual contact by</i>

*an employee or volunteer will be forwarded to the Assistant Warden who will arrange for the incident to be investigated. Employees may be immediately relieved of duty by the Warden or Assistant Warden if such is deemed necessary. An employee may be suspended pending the outcome on an investigation into an allegation of sexual contact and subjected to internal disciplinary procedures and criminal prosecution. Termination will be the presumed sanction for a staff person found guilty of sexual abuse.*

**Onsight Audit, Documentation Review, and Interviews**

During the Onsight Audit, Investigation documentation reviews, HR documentation review, staff inmate interviews, and no letters were sent to the PREA Auditor mailbox indicating that any allegations of sexual abuse or harassment were not reported, or investigated, in compliance with these standards. There were no substantiated allegations of sexual abuse nor harassment involving staff in the past 12 months.

Interviews with the Human Resources (HR), PREA Coordinator (PCO), and the Warden confirmed that staff have not been disciplined for Sexual Abuse nor Harassment in the past 12 months. HR, PCO and Warden all confirmed that the presumption for Substantiated Sexual Abuse will be termination. Additionally, they all also noted that Substantiated Sexual Harassment, or violations of the PREA Policies, can be up to and including termination depending on the violation and/or severity. The PCO also indicated that Sexual Abuse would be referred to the District Attorney for prosecution by the Pennsylvania State Police.

This auditor did not see in any investigatory files, and HR files, that staff discipline was warranted in the last 12 months. Additionally, there were no indication from staff and inmate interviews that staff were violating the PREA policies.

115.77	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.77 a-b</b></p> <p><i>IV. GENERAL INFORMATION</i></p> <p><i>A. General Information</i></p> <p><i>14. ... Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with inmates/detainees and shall be reported to law enforcement and relevant licensing bodies, where applicable. Other violations of Pike County Correctional Facility sexual abuse or harassment policies could result in remedial measures and prohibition of further contact with inmates/detainees when appropriate. All employee terminations for violations of agency sexual abuse or</i></p>

*sexual harassment policies, or resignations by staff who would have been terminated will be reported to law enforcement agencies and to any relevant licensing bodies unless the activity was clearly not criminal.*

**Onsight Audit, Documentation Review, and Interviews**

During the Onsight Audit, Investigation documentation reviews, HR documentation review, staff inmate interviews, and no letters were sent to the PREA Auditor mailbox indicating that any allegations of sexual abuse or harassment were not reported, or investigated, in compliance with these standards. There were no substantiated allegations of sexual abuse nor harassment involving volunteers or contractors in the past 12 months.

Interviews with the Human Resources (HR), PREA Coordinator (PCO), and the Warden confirmed that none of the volunteer, nor contractors, have been removed from service for Sexual Abuse nor Harassment in the past 12 months. HR, PCO and Warden all confirmed that the presumption for Substantiated Sexual Abuse and/or Harassment will be permanent removal from the facility. The PCO also indicated that Sexual Abuse would be referred to the District Attorney for prosecution by the Pennsylvania State Police if it met criminal standards.

This auditor did not see in any investigatory files, and HR files, whereas volunteers or contractors were separated from service was warranted in the last 12 months. Additionally, there were no indication from staff and inmate interviews that volunteers nor contractors were violating the PREA policies.

<b>115.78</b>	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1020 addresses 115.78 a-c and g-2</b></p> <p><i>I. POLICY</i></p> <p><i>It is the policy of Pike County Correctional Facility to have in place a system of inmate/detainee discipline that will serve to protect the public, inmates/detainees, staff and to maintain order in the facility through the impartial application of a fully developed, well understood set of rules and regulations and a disciplinary hearing procedure that incorporates all applicable due process requirements.</i></p> <p><i>II. PROCEDURE</i></p> <p><i>A. Disciplinary guidelines:</i></p>

5. When an Inmate/Detainee has a diagnosed mental illness, mental disability, or demonstrates symptoms of mental illness or mental disability, a mental health care professional, preferably the treating clinician, shall be consulted to provide input as to the inmates'/detainees' competence to participate in the disciplinary hearing, any impact the Inmates/Detainees mental illness may have had on his/her responsibility for the charged behavior. And information about any known mitigating factors in regard to the behavior.

6. If an Inmate/Detainee has a mental disability or mental illness but is competent, the disciplinary board shall consider whether the individuals' mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. A mental health professional should be consulted as to whether certain types of sanctions may be inappropriate because they would interfere with the individuals' treatment or recovery plan.

B. Prohibited Acts -...

(7) Assaulting any person (includes sexual assault).

(17) Engaging in sexual acts.

E. Sanctions:

1. The board is empowered to impose appropriate sanctions when a charge is substantiated by information obtained in the hearing process, including staff reports, inmate/detainee statements, and information derived from documentary evidence and witness statements.

3. The board will impose the allowable sanctions noted above in proportion to the seriousness of the infractions involved for the purpose of disciplining the inmate/detainee and controlling behavior. Sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate/detainee disciplinary history, and the sanctions imposed for comparable offenses by other inmate/detainee with similar histories.

**SOP 1517 addresses 115.78 d-g**

IV. GENERAL INFORMATION

I. POLICY

...Consensual sexual activity is prohibited, and does not constitute sexual abuse...

A. General Information

8. Inmates/detainees identified as sexual predators will be placed on an appropriate segregation status through disciplinary action, classification, or reclassification. Therapy and counseling by medical staff will address and correct underlying reasons or motivation for the abuse. Classification is a preventative tool to lower sexual misconduct and assault claims.



*B. Investigation*

6. ...A report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred will not result in lying charges, even if the allegations are found unsubstantiated. Inmates/Detainees shall not be disciplined for sexual contact with staff unless there is a finding that the staff member did not consent to such contact.

**Onsight Audit, Documentation Review, and Interviews**

During the Onsight Audit, Investigation documentation reviews, staff interviews, inmate interviews, and no letters were sent to the PREA Auditor mailbox indicating that any allegations of sexual abuse or harassment were not reported, or investigated, in compliance with these standards. There were no substantiated allegations of sexual abuse nor harassment involving inmate on inmate in the past 12 months.

Interviews with the PREA Coordinator (PCO), Staff, and the Warden confirmed that inmates have not been disciplined for Sexual Abuse nor Harassment in the past 12 months. Disciplinary segregation and separation would be the minimum presumptive discipline for Substantiated Sexual Abuse and Harassment. Additionally, alleged sexual abusers would be reclassified to increase their custody level and single celling would be imposed for inmate safety. Sexual abusers would be referred to Medical, Behavioral Health, and per the PCO the Victims' Intervention Program has also agreed to work with person to address their underlying issues pertaining to sexual abusiveness. Finally, all Sexual Abuse and criminal acts of sexual harassment would be referred to the District Attorney for prosecution by the Pennsylvania State Police.

This auditor did not see in any investigatory files that inmate discipline was warranted for Sexual Abuse or Harassment in the last 12 months. The one disciplinary sanction incident imposed was for consensual sexual acts and not treated as a PREA allegation. Finally, there were no indication from staff, and inmate, interviews that inmates who committed Sexual Abuse or Harassment were not disciplined per the PREA and disciplinary policies.

<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<b>SOP 1517 addresses 115.81</b>
	<i>III. PROCEDURE</i>
	<i>1. ...The mental health practitioner will obtain informed consent from inmate/detainee before reporting information about prior sexual victimization that did not occur in an</i>

*institutional setting. All medical practitioners are required to inform inmates/ detainees at the initiation of services of their duty to report, and the limitations of confidentiality, unless otherwise precluded by federal, state, or local law. Offenders will sign a copy of this informational document which will then be placed in their medical file.*

*18. Allegations of sexual abuse in which the alleged victim is under the age of 18 or considered a vulnerable adult will be reported to designated state or local service agencies. (PDA Mandatory Abuse Reporting (717-265-7887)/Pennsylvania Department of Public Welfare "Childline" (900-932-0313).*

**Prime Care PREA Policy**

Addresses confidentiality requirements for all medical staff. In addition, it covers mandatory Specialized Medical/Mental health training, mandated reporting for PREA allegations, mandated reporting to ChildLine for under 18 inmates, first responder duties, preservation of evidence, and access to SAFE/SANE if allegation of penetration occurred within 96 hours.

**Onsite, document review, Interviews**

During the onsite tour, spot check interviews were conducted with medical staff. Prime care medical staff were well versed in reporting methods, follow up care for inmates who alleged prior sexual abuse, and were aware that inmates did not have to pay for services related to sexual abuse allegations. The nursing supervisor explained that the initial medical screening occurs immediately following the intake process. Inmates are escorted to a private area and screened by trained medical staff. The screening includes medical, mental health, and PREA questions. The PREA questions include questions about prior victimization. If during the screening process the inmates appear to be at high risk for victimization the medical staff notify the Shift Commander who will in turn evaluate appropriate housing concerns. Inmates were processing during the onsite audit and the auditor was permitted to observe the process. Any medical concerns are also followed up with to ensure inmates are physically cared for.

All inmates are provided with information related to Victims intervention Programming (VIP), a community-based service that comes into the facility to work with inmate victims or sexual abuse.

Interviews with sexual abuse survivors indicated that they were provided access to medical, mental health, and advocacy services.

Interviews with the medical staff indicated that inmate who reported prior victimization were offered medical follow up, mental health services, and advocacy services.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

**SOP 1517 addresses 115.82**

*III. PROCEDURE*

*Security Staff notified of or suspecting an alleged sexual assault, abuse or harassment, will privately:*

*2. Immediately notify the Shift Commander and medical health care personnel.*

*Medical Staff will:*

*1. Ensure that information is provided to offenders during their initial examination about sexual assault/abuse and harassment. This information will include methods of prevention and intervention, self-protection, reporting sexual assault/abuse, treatment, access to outside victim advocates or rape crisis organizations (addresses and telephone numbers) and counseling...*

*2. Coordinate with the Shift Commander to arrange for a transport to Wayne Memorial Hospital for forensic medical examinations without cost to the inmate/detainee. Treatment services will be provided regardless of whether or not the victim names the abuser or cooperates with any investigation arising out of the incident. Exams should be performed by sexual assault forensic examiners (SAFE's) or sexual assault nurse examiners (SANE's). In the event that a SAFE or SANE is not available, a qualified medical practitioner will conduct the exam and staff will document on an incident report.*

*5. Stay with the inmate/detainee to offer first aid and emotional support. The inmate/detainee cannot be left unattended at any time. All findings and behaviors must be documented in the inmate/detainee medical record. Medical will provide information about and access to emergency contraception and sexually transmitted infectious prophylaxis, where medically appropriate.*

*7. Schedule inmate/detainee to see psychiatrist as soon as possible for mental health evaluation and treatment where appropriate.*

**Onsite, Interviews, documentation reviews**

PREA Coordinator noted that there were no sexual abuse allegations that required medical intervention nor outside hospital treatment. On the spot interviews, conducted during the tour, with medical staff and a targeted interview with medical staff indicated that Prime Care staff did not conduct any Sexual Abuse allegation examinations on site. Prime Care has a liaison at Wayne Memorial Hospital who confirms every six months that the hospital continues to offer SAFE/SANE services for victims of sexual assault. The interviewee was aware that all allegations of penetration that occurred within 96 hours needed to be seen by outside medical for a proper assessment and that services related to sexual assault would not be charged

	<p>to the inmates.</p> <p>This auditor did not see in any investigatory files, and there was no indication from staff nor inmate interviews that allegations of Sexual Abuse, Harassment, Retaliation, or violations of PREA policies were not investigated in compliance with the standards.</p> <p>There were no indications during the audit that inmates who needed emergency access to medical care would not be immediately transported by the facility to Wayne Memorial Hospital.</p>
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<b>115.83</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.83</b></p> <p><i>IV. GENERAL INFORMATION</i></p> <p><i>B. Investigation</i></p> <p><b>III. PROCEDURE</b></p> <p><i>Medical Staff will:</i></p> <ol style="list-style-type: none"> <li><i>2. Coordinate with the Shift Commander to arrange for a transport to Wayne Memorial Hospital for forensic medical examinations without cost to the inmate/detainee. Treatment services will be provided regardless of whether or not the victim names the abuser or cooperates with any investigation arising out of the incident. Exams should be performed by sexual assault forensic examiners (SAFE's) or sexual assault nurse examiners (SANE's). In the event that a SAFE or SANE is not available, a qualified medical practitioner will conduct the exam and staff will document on an incident report.</i></li> <li><i>3. Take a history to document extent of injury.</i></li> <li><i>4. Notify the Facility HSA.</i></li> <li><i>5. Stay with the inmate/detainee to offer first aid and emotional support. The inmate/detainee cannot be left unattended at any time. All findings and behaviors must be documented in the inmate/detainee medical record. Medical will provide information about and access to emergency contraception and sexually transmitted infectious prophylaxis, where medically appropriate.</i></li> <li><i>7. Schedule inmate/detainee to see psychiatrist as soon as possible for mental health evaluation and treatment where appropriate.</i></li> <li><i>8. Follow any instructions from attending physician at Wayne Memorial Hospital for treatment plans.</i></li> <li><i>9. Make arrangements with Psychologist for crisis intervention counseling and long-</i></li> </ol>

term follow-up as well as necessary referrals for continued care following a transfer or release.

12. All services provided will be in a manner that is consistent with the level of care the victims would receive in the community and include pregnancy test and all lawful pregnancy related medical services where applicable.

**SOP 1517 addresses 115.83 h**

**IV. GENERAL INFORMATION**

**A. General Information**

8. ... Therapy and counseling by medical staff will address and correct underlying reasons or motivation for the abuse. Classification is a preventative tool to lower sexual misconduct and assault claims.

**Prime Care PREA Policy**

Addresses confidentiality requirements for all medical staff. In addition, it covers mandatory Specialized Medical/Mental health training, mandated reporting for PREA allegations, mandated reporting to ChildLine for under 18 inmates, first responder duties, preservation of evidence, access to SAFE/SANE if allegation of penetration occurred within 96 hours, pregnancy termination options, STD testing/Prophylactics, and services at no cost to inmates.

**Onsite, Interview, and document review**

PREA Coordinator noted that there were no sexual abuse allegations that required medical intervention nor outside hospital treatment. Spot interviews during the tour with medical staff and a targeted interview with medical staff indicated that Prime Care staff was aware that inmates who had experienced sexual assault would be medically evaluated and offered mental health services. Additionally, medical staff affirmed that inmates would receive follow up medical and mental health care, at no cost to them, including STD treatments and pregnancy termination (if they were the victim of Institutional sexual assault resulting in pregnancy).

This auditor did not see in any investigatory files, and there was no indication from staff nor inmate interviews that allegations of Sexual Abuse, Harassment, Retaliation, or violations of PREA policies were not investigated in compliance with the standards.

There were no indications during the audit that inmates who needed emergency access to medical care would not be immediately transported by the facility to Wayne Memorial Hospital.

115.86	Sexual abuse incident reviews
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

	<p><b>SOP 1517 addresses 115.86 a-c</b></p> <p><i>IV. GENERAL INFORMATION</i></p> <p><i>C. Incident Review Team</i></p> <p><i>1. A sexual abuse incident review will be conducted 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 with thirty (30) days.</i></p> <p><i>2. The review team will include the Warden, Assistant Wardens, (PSA) Compliance Managers and allows input from the Shift Commanders, facility investigators, and medical staff.</i></p> <p><i>3. The review team will: consider whether the allegation or investigation indicates a need to change policy to better prevent, detect, or respond to sexual abuse. Whether the incident or allegation was motivated by the perpetrator or victims' race, ethnicity, gender identity, LGBTI identification, status or perceived status, gang affiliation or motivated by other group dynamics. Examine the location where the incident allegedly occurred to assess whether physical barriers in the area enable abuse. Assess the adequacy of staffing levels in the location during different shifts. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff. Prepare a report of its findings and any recommendations for improvement and submit to the Warden. The Warden will implement recommendations for improvement from the review teams report or document his reason for not doing so.</i></p> <p><b>Onsite, Document review, Interviews</b></p> <p>This auditor did not see in any investigatory files, and there was no indication from staff nor inmate interviews that allegations of Sexual Abuse, Harassment, Retaliation, or violations of PREA policies were not investigated in compliance with the standards. There was one Sexual Abuse allegation that was unfounded.</p>
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<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.87</b></p> <p><i>IV. GENERAL INFORMATION</i></p> <p><i>B. Investigation</i></p> <p><i>F. Data Collection</i></p> <p><i>1. The Pike County Correctional Facility will utilize form SSV-3 (4-2-2010) Survey of Sexual Violence, 2009 local jail jurisdictions summary form annually.</i></p> <p><i>2. Pike County Correctional Facility will obtain incident based and aggregated data</i></p>

*from contracted facilities which are housing Pike County inmates at least annually.*

*3. All data from the previous year can be provided to the department of justice by June 30.*

*4. An annual report will be prepared documenting the findings from the data review and any corrective actions taken by the incident review team. The report will include a comparison of the current year's data and corrective actions with those from previous years and an assessment of the progress in addressing sexual abuse. The Warden will approve this report and make available to the public through request. Specific material may be redacted from the reports when publication presents a clear and specific threat to the safety and security of the facility and indicates the nature of the material redacted. This annual report will be forwarded to the PSA Coordinator and the FOD.*

*5. This data will be retained for at least ten (10) years after the date of initial collection.*

### **Onsite documentation review and Interviews**

There were no reports of unreported/investigated Sexual Abuse nor Sexual Harassment allegations from either staff, inmates, or letters were received at the auditor's mailbox listed on the mandatory PREA Audit notification posters. The facility provided all investigations involving PREA for the last 12 months, none of which met the definition of Sexual Abuse.

The PREA Coordinator did provide this auditor with the statistical reports for 2021 and 2022. facility Sexual Abuse and Sexual Assault Reports

There were no SSV-3 (4-2-2010) Survey of Sexual Violence completed in this last 12 months due to having no sexual abuse allegations. The lack of Sexual Abuse allegations can be supported by the overall organization and logistical operations at the facility. The cells are laid out in a manner that allows for line of sight into the cells, without violating the cross-gender prohibition against viewing inmates using the toilet/showering. There are no isolated areas on the units (supply/broom closets) and supplies are on rolling carts that can be taken on and off the units as needed. The showers have curtains that are shortened to ensure that only one inmate is in each stall at a time. The inmates only work in areas that have adequate camera coverage. Inmates do not work with areas that they can have access to isolation including Maintenance. In areas like the Kitchen and laundry there are large glass windows that look into the areas and camera coverage. Restroom, walk in freezers/refrigerators are all locked and inmates are directly supervised by the staff.

During the onsite tours we observed that male and female inmates were staggered in movements and female units had additional barriers to avoid male inmates from viewing into their housing unit.

<b>115.88</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.87</b></p> <p>IV. GENERAL INFORMATION</p> <p>B. Investigation</p> <p>F. Data Collection</p> <p>4. An annual report will be prepared documenting the findings from the data review and any corrective actions taken by the incident review team. The report will include a comparison of the current year's data and corrective actions with those from previous years and an assessment of the progress in addressing sexual abuse. The Warden will approve this report and make available to the public through request. Specific material may be redacted from the reports when publication presents a clear and specific threat to the safety and security of the facility and indicates the nature of the material redacted. This annual report will be forwarded to the PSA Coordinator and the FOD.</p> <p>5. This data will be retained for at least ten (10) years after the date of initial collection.</p> <p><b>Document Review, Interviews, and Website Review:</b></p> <p>This auditor did not see in any investigatory files, and there was no indication from staff nor inmate interviews that allegations of Sexual Abuse, Harassment, Retaliation, or violations of PREA policies were not investigated in compliance with the standards. There was only 1 sexual abuse allegation in the last 12 months that was unfounded.</p> <p>PREA Annual Review 2022 is published on the website as "PREA Annual Audit" at: Pike County, PA (pikepa.org)</p>

<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>SOP 1517 addresses 115.89</b></p> <p>IV. GENERAL INFORMATION</p> <p>B. Investigation</p>



F. Data Collection

1. The Pike County Correctional Facility will utilize form SSV-3 (4-2-2010) Survey of Sexual Violence, 2009 local jail jurisdictions summary form annually.
2. Pike County Correctional Facility will obtain incident based and aggregated data from contracted facilities which are housing Pike County inmates at least annually.
3. All data from the previous year can be provided to the department of justice by June 30.
4. An annual report will be prepared documenting the findings from the data review and any corrective actions taken by the incident review team. The report will include a comparison of the current year's data and corrective actions with those from previous years and an assessment of the progress in addressing sexual abuse. The Warden will approve this report and make available to the public through request. Specific material may be redacted from the reports when publication presents a clear and specific threat to the safety and security of the facility and indicates the nature of the material redacted. This annual report will be forwarded to the PSA Coordinator and the FOD.
5. This data will be retained for at least ten (10) years after the date of initial collection.

**Onsite, Interview, and Website review**

During the onsite audit it was determined that the aggregate data was stored and secured in the PREA Coordinators office. The Warden and PREA Coordinator confirmed that the data was stored for 10 years, and the access was limited to Administration staff only.

This auditor did not see in any investigatory files, and there was no indication from staff nor inmate interviews that allegations of Sexual Abuse, Harassment, Retaliation, or violations of PREA policies were not investigated in compliance with the standards. There was only 1 sexual abuse allegation in the last 12 months that was unfounded.

PREA Annual Review 2022 is published on the website as "PREA Annual Audit" at:

Pike County, PA (pikepa.org)

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<b>Onsite Audit and Document Review</b>

	<p>The Facility had the last full PREA Audit, with the onsite, January 21st and 22nd of 2020. The Agency and facility are the same as they do not operate any other locations, nor contract with any other location to house their inmates/detainees. With this audit conducting the onsite December 4th and 5th of 2023, the facility is being audited every three years within the audit cycles.</p> <p>This auditor was permitted to conduct private interviews with inmates, residents, and detainees. There were no barriers present to access any inmate/detainee in the facilities custody.</p> <p>This auditor did not see in any investigatory files, and there was no indication from staff nor inmate interviews that allegations of Sexual Abuse, Harassment, Retaliation, or violations of PREA policies were not investigated in compliance with the standards.</p>
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<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Website review</p> <p>The 2020 Pike County Correctional Facility's PREA Audit report is published on their website at:</p> <p><a href="https://www.pikepa.org/courts__law/correctional_facility/downloadable_documents.php#outer-94">https://www.pikepa.org/courts__law/correctional_facility/downloadable_documents.php#outer-94</a></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	na

	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.)	
<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	yes

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

<b>115.14 (a) 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).)	yes
<b>115.14 (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).)	yes
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
<b>115.14 (c) 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).)	yes
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
<b>115.15 (a) 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) 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	yes

	facility does not have female inmates.)	
<b>115.15 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
<b>115.15 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
<b>115.15 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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



	with inmates with disabilities including inmates who: Have intellectual disabilities?	
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
<b>115.16 (b)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
<b>115.16 (c)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
<b>115.17 (a)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who	yes

	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?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
<b>115.17 (b)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
<b>115.17 (c)</b>	<b>Hiring and promotion decisions</b>	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
<b>115.17 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes

<b>115.17 (e)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
<b>115.17 (f)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
<b>115.17 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	

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

	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
<b>115.21 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	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.)	yes
<b>115.21 (h)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	yes
<b>115.22 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	

	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
<b>115.22 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
<b>115.22 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
<b>115.31 (a)</b>	<b>Employee training</b>	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes

	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
<b>115.31 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
<b>115.31 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
<b>115.31 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.32 (a)</b>	<b>Volunteer and contractor training</b>	

	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
<b>115.32 (b)</b>	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
<b>115.32 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
<b>115.33 (a)</b>	<b>Inmate education</b>	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
<b>115.33 (b)</b>	<b>Inmate education</b>	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
<b>115.33 (c)</b>	<b>Inmate education</b>	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes



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

	Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
	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	yes

	suspicious 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.)	
<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	yes

	screening instrument?	
<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)	yes

	Whether the inmate is detained solely for civil immigration purposes?	
<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	yes

	information is not exploited to the inmate's detriment by staff or other inmates?	
<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	yes

	present management or security problems?	
<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	yes

	solely for the placement of LGBT or I inmates pursuant to a consent degree, legal settlement, or legal judgement.)	
<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.)	na
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na
<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) 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) 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) 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) 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	yes

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes
<b>115.51 (c)</b>	<b>Inmate reporting</b>	
	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.	yes
<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	na

	this standard.)	
	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,	yes

	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.)	
	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	yes

	abuse or sexual harassment or retaliation?	
<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	yes

	response to an incident of sexual abuse?	
<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	yes



	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?	
	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	yes

	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).)	
	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	yes

	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?	
<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	yes

	evidence sufficient to substantiate the allegation?	
<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
<b>115.81 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	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	yes

	sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	
<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</b>	



	<b>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.)	yes

<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
<b>115.86 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.86 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
<b>115.86 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.86 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

<b>115.87 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
<b>115.87 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
<b>115.87 (c)</b>	<b>Data collection</b>	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
<b>115.87 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.87 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
<b>115.87 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na
<b>115.88 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	yes

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

	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	yes
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
<b>115.403</b>	<b>Audit contents and findings</b>	

<b>(f)</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