

PREA Facility Audit Report: Final

Name of Facility: Kendall County Jail

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 12/04/2023

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Robert Manville	Date of Signature: 12/04/ 2023

AUDITOR INFORMATION	
Auditor name:	Manville, Robert
Email:	robertmanville9@gmail.com
Start Date of On-Site Audit:	10/16/2023
End Date of On-Site Audit:	10/18/2023

FACILITY INFORMATION	
Facility name:	Kendall County Jail
Facility physical address:	1102 Cornell Lane, Yorkville, Illinois - 60560
Facility mailing address:	

Primary Contact	
Name:	Nancy Velez
Email Address:	nvelez@kendallcountyil.gov
Telephone Number:	6305537500

Warden/Jail Administrator/Sheriff/Director	
Name:	Jeanne Russo
Email Address:	jrusso@kendallcountyil.gov
Telephone Number:	6305537500

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

Facility Health Service Administrator On-site	
Name:	Adrianna Contreras
Email Address:	avaldezcontreras@kendallcountyil.gov
Telephone Number:	6305537500

Facility Characteristics	
Designed facility capacity:	107
Current population of facility:	84
Average daily population for the past 12 months:	84
Has the facility been over capacity at any point in the past 12 months?	No

Which population(s) does the facility hold?	Males
Age range of population:	18-80
Facility security levels/inmate custody levels:	Minimum-Maximum
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	36
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	7
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	22

AGENCY INFORMATION

Name of agency:	Kendall County Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	1102 Cornell Lane, Yorkville, Illinois - 60560
Mailing Address:	
Telephone number:	6305537500

Agency Chief Executive Officer Information:

Name:	Dwight Baird
Email Address:	dbaird@kendallcountyil.gov
Telephone Number:	630-553-7500 x 1111

Agency-Wide PREA Coordinator Information

Name:	Nancy Velez	Email Address:	nvelez@kendallcountyil.gov
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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

- 115.17 - Hiring and promotion decisions
- 115.31 - Employee training
- 115.33 - Inmate education
- 115.88 - Data review for corrective action

Number of standards met:

41

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2023-10-16
2. End date of the onsite portion of the audit:	2023-10-18

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Mutual Ground Inc.

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	107
15. Average daily population for the past 12 months:	84
16. Number of inmate/resident/detainee housing units:	68
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	68
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	1
40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	1
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:	1

<p>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>1</p>
<p>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>No text provided.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>36</p>
<p>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>22</p>

<p>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>6</p>
<p>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</p>	<p>No text provided.</p>
<p>INTERVIEWS</p>	
<p>Inmate/Resident/Detainee Interviews</p>	
<p>Random Inmate/Resident/Detainee Interviews</p>	
<p>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>16</p>
<p>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p> <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 type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None </p>
<p>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>I interview inmates from each housing unit.</p>
<p>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p> <input checked="" type="radio"/> Yes <input type="radio"/> No </p>

57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	3
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.

<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Prior to the selection of inmates to interview the PREA Coordinator, Medical staff, and auditor reviewed the computerized screening instrument and discussed all of the target population. There were no disabled inmates identified on the screening instrument or the medical screening.</p>
<p>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:</p>	<p>1</p>
<p>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:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Prior to the selection of inmates to interview the PREA Coordinator, Medical staff, and auditor reviewed the computerized screening instrument and discussed all of the target population. There were no disabled inmates identified on the screening instrument or the medical screening.</p>
<p>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:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Prior to the selection of inmates to interview the PREA Coordinator, Medical staff, and auditor reviewed the computerized screening instrument and discussed all of the target population. There were no disabled inmates identified on the screening instrument or the medical screening.</p>
<p>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:</p>	<p>1</p>
<p>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:</p>	<p>1</p>
<p>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:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Prior to the selection of inmates to interview the PREA Coordinator, Medical staff, and auditor reviewed the computerized screening instrument and discussed all of the target population. There were no inmates identified on the screening instrument or the medical screening as transgender or intersex inmates.</p>
<p>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Prior to the selection of inmates to interview the PREA Coordinator, Medical staff, and auditor reviewed the computerized screening instrument and discussed all of the target population. There were no inmate that claimed sexual abused housed at the jail during the onsite audit.</p>
<p>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input checked="" type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Prior to the selection of inmates to interview the PREA Coordinator, Medical staff, and auditor reviewed the computerized screening instrument and discussed all of the target population. There were no inmates identified on the screening instrument or the medical screening of history of victimization.</p>
<p>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Prior to the selection of inmates to interview the PREA Coordinator, Medical staff, and auditor reviewed the computerized screening instrument and discussed all of the target population. There were no inmates housed in the segregation area due to risk of victimization.</p>

70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.
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Staff, Volunteer, and Contractor Interviews

Random Staff Interviews

71. Enter the total number of RANDOM STAFF who were interviewed:	14
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72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	<input type="checkbox"/> Length of tenure in the facility <input checked="" type="checkbox"/> Shift assignment <input type="checkbox"/> Work assignment <input type="checkbox"/> Rank (or equivalent) <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None
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73. Were you able to conduct the minimum number of RANDOM STAFF interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
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Specialized Staff, Volunteers, and Contractor Interviews

Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.

75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	8
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76. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
78. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
79. Were you able to interview the PREA Compliance Manager?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of VOLUNTEERS who were interviewed:	1
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	2
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
83. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.

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

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).

The Kendall County Public Safety Center is located at 1102 Cornell Lane, Yorkville, IL. The facility was opened in 1992. The capacity of the jail is 107 and there was 68 inmates housed during the on-site audit. The jail is divided into three areas commonly referred to as the East, South and West End.

The jail has closed the south side of the jail and reduced the housing and staffing due to a reduction in utilizing of the jail.

The West End contains three dorms and five pods. The dormitories house up to 11 inmates. The pods up to 2 detainees. The East End contains four holding cells and two housing areas. One housing area contains 7 cells with a maximum of 10 beds and the other housing area contained 6 cells with a maximum capacity of 9 beds.

The jail is a modular/linear design with a central control where housing units are under video surveillance.

The Booking areas are utilized as the Receiving/Discharge area. Upon arriving at the facility, detainees are searched using a body scan machine. If the machine indicates the present of contraband the inmates are individually taken to an office to be searched. There is a partition for inmate's privacy during the shakedown. Only inmates of the same gender conduct these searches. There were zero-tolerance posters displayed in the intake area. The facility has added a brochure for inmates arriving at the facility to enhance notification to inmates of the jail's zero-tolerance right to be free from sexual abuse, and how to report an allegation of sexual abuse or sexual harassment.

The Health Services Department contains treatment rooms and offices. While there are cameras located in the health services area, none of the cameras provided a view of the examination rooms. Health services are operated by a private vendor.

All areas of foodservice are under constant surveillance with cameras, mirrors, or staff supervision. There are zero-tolerance posters in all food service areas. A private vendor

operates the food service department. Inside each of the living-units, there are showers with a wall separating the showers from the facility's open area. The facility has installed curtains up from the wall to provide more privacy when offenders are showering. Upon entering each dormitory, the following signs were displayed on a bulletin board framed on the walls; PREA zero-tolerance signs, Victim support services, Third-party reporting, and Notice of PREA audit in English and Spanish were posted on each bulletin board.

The Visitation area allows contact and non-contact visits. There were PREA zero-tolerance signs were posted in both English and Spanish; Victim support services, Third-party reporting, and Notice of PREA audit were also posted in this area. There are cameras in the visitation room. There were no cameras located in a private area utilized to search offenders before and after visits.

During the review of all cameras located at the facility, none of the shake-down partitions could be viewed by the persons reviewing cameras. A review of all cameras found that all were operational, and none provided any privacy concerns. The facility completed a complete upgrade to the camera and monitoring system in 2018. The center has further enhanced its ability to monitor by equipping all direct care staff with body cams.

During the tour posting were noted to include Zero Tolerance, Victim Advocate Services, and way to report posters. The audit used an inmate phone to call "CRISIS" (external reporting process). Mutual Ground answered the phone and was told of the testing for the PREA audit. The auditor also made a call to the HELP line. This call pages the PREA Coordinator and Jail Administrator.

During the tour the auditor visited with several inmates and talked about their understanding of PREA and ways to report.

Many of the inmates interviewed during the tour and during the official interview had been

at the jail less than one week. In interviews with the PREA coordinator, she indicated that is the normal stay for inmates. All inmates could remember being asked questions about their history of victimization, disabilities and sexual orientation. All inmates indicated they saw two videos when they first arrived, received a handbook and had a pamphlet about PREA. Most had read the Pamphlet and could explain the role of the Mutual Ground Victim Advocates.

Staff visited with during the tour shared they receive training a minimum of once a month and explained the PREA coordinator of Facility Chief often conducted the training which include scenarios with what to do questions. Based on review of the standards and tour of the facility it was observed that the jail is a model for developing a culture of a sexually safe environment.

Documentation Sampling

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

90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?

- Yes
- No

91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).

Inmate Files Reviewed: There were 12 inmate records reviewed. These records included the following information.

- Identification Number
- Date of Birth
- Date of Arrival
- Date of Screening
- Date of Follow-up Screening
- Date of Initial PREA notification
- Date of PREA orientation/ education
- Date of notification to MH referrals:

Employee/Contractor Background Checks: Six (6) background clearance files including newly hired staff, staff that had been promoted, employees that had over five years tenure at the facility and two (2) contractors. The jail provided a master roster Background checks for all staff that completed in 2023. The center provided 15 questionnaires that are utilized for newly hired, promotions, and yearly appraisals.

Staff Training

Fifteen training files for staff were reviewed. All training has been completed in the last 12 months: The center also provided the auditor with sign in sheets of refresher training through the year. Training files also included investigator training and medical training.

Investigative Files

There are 9 investigative reports provided for the auditor to review. The reports were on sexual abuse, sexual harassment and included criminal and administrative investigation. Four of these investigative files were the Kendall part of the investigation on allegations that were made when inmates arrived at Kendall County Jail. Included in the investigative files were retaliation monitoring, after action (IRT) reports and investigative notes.

Unannounced Rounds:

The logbooks and computerized unannounced rounds were reviewed in each housing unit and the control room. The facility was asked for and provided the unannounced round located in three random control rooms on a specific date.

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	1	0	1	0
Staff-on-inmate sexual harassment	2	0	2	0
Total	3	0	3	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	0	1	0
Staff-on-inmate sexual abuse	0	1	0	0
Total	0	1	1	0

Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	0	1	0
Staff-on-inmate sexual harassment	0	1	1	0
Total	0	1	2	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:

2

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

<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>3</p>
<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</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 sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>1</p>
<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</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>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

Staff-on-inmate sexual harassment investigation files	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	2
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	This is the total for allegation made at the jail and not allegations that were reported when the inmate arrived at the jail.
SUPPORT STAFF INFORMATION	
DOJ-certified PREA Auditors Support Staff	
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.	<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

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

Identify the name of the third-party auditing entity

Diversified Consulting

Standards
<p>Auditor Overall Determination Definitions</p> <ul style="list-style-type: none"> • Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions)
<p>Auditor Discussion Instructions</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>

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>The following policies, directives, memorandum and agency or facility supplements were reviewed for compliance with this standard.</p> <p>Kendall Sheriff’s Department (KCSD) Policy 606 PREA</p> <p>KCSD PREA Operational Plan</p> <p>Zero Tolerance Poster</p> <p>Kendall County Jail Memo: Sheriff</p> <p>Kendall County Sheriff’s office website</p> <p>Organizational Chart and Chain of Command</p>

Kendall County Jail Org Chart

115.11(a) Kendall Sheriff's Department (KCSD) Policy 606 PREA provides direction to staff regarding the facility's approach to preventing, detecting, and responding to conduct that violates the zero-tolerance approach regarding all forms of sexual abuse and sexual harassment.

Definitions of prohibited behaviors of sexual abuse and sexual harassment are contained in Policy. It also includes sanctions for those found to have participated in the prohibited behaviors. The facility has additional policies which support the PREA standards. The policy establishes that all facilities, staff, inmates, volunteers, contractors, or visitor are committed to a zero-tolerance standard for incidents of sexual abuse and sexual harassment. Inmates with disabilities are afforded the same rights and will be provided access to interpreters, presented material to effectively communicate with those inmates who have intellectual disabilities, limited reading skills, blind or have low vision. Inmates will have access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. Interpreters will be provided through local community resources. Inmates with disabilities have equal opportunity to participate in and benefit from all aspects of KCJ efforts to prevent, detect, and respond to sexual abuse and sexual harassment. In interviews with clinical staff, the center has not only embraced PREA mandates but has adapted PREA standards and culture into the program model. It is the policy of KCJ inmate that all sexual activity between inmates is prohibited and may result in disciplinary action for such activity. Incidents by youth in which youth may engage in sexual contact with staff such as unwanted touching, the youth may receive programmatic sanctions. For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

115.11 (b): Kendall County Jail is under the supervision of the Kendall County Sheriff's office. The PREA coordinator/Compliance manager is under the direct supervision of the Jail Chief of Operations.

115.11 (c): The PREA Coordinator indicated through review that she has sufficient time and authority to coordinate the facilities PREA efforts. Interviews with the staff and inmates at the facility ensure that the center provides training to inmates, staff, volunteers, and contractors. Interview with staff verified that all persons at the center undergo training prior to having contact with inmates and then on a yearly basis.

Compliance was determined by review of the organizational chart and interviews with the PREA coordinator, Chief of Operations, Agency Head, staff and inmates at the facility.

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Kendall County Sheriff's Office has engaged in contracting with two other jails to house inmates. These jails are not authorized to house USMS, Cook County or BOP inmates. Each of the contracts stipulates that the jails will comply with all PREA standards and will post PREA notices throughout the jails.</p> <p>Compliance was determined by review of the contracts and interviews with agency contracting authority and Chief of Operations for Kendall County Jail.</p>

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>Staffing Plan Staffing Plan 2023</p> <p>Staffing Plan Staffing Plan 2022</p> <p>Unannounced Rounds</p> <p>PREA Documentation of Unannounced Rounds.</p> <p>Annual Facility Assessment</p> <p>Staff Rosters (3) shifts Camera Inventory/Locations</p> <p>Kendall County Jail Staffing Plan</p> <p>KCSD Policy 606</p> <p>PREA Operational Plan</p> <p>Staffing Plan re: Adequate Levels of Staffing</p> <p>Officer Command Rounds</p> <p>115.13 (a)(b):</p> <p>Kendall County jail mandates that the facility will complete a staffing plan prior to opening a facility and will continue to review a minimum of once a year utilizing the following criteria.</p>

- Generally accepted detention and correctional practices.
- Judicial findings of inadequacy.
- Findings of inadequacy from Federal investigative agencies.
- Findings of inadequacy from internal or external oversight bodies.
- All components of the facility's physical plant.
- The composition of the inmate population.
- The number and placement of supervisory staff.
- Institution programs occurring on a particular shift.
- Applicable State or local laws, regulations, or standards.
- The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and
- Other relevant factors.

Interviews with the Jail administrator and executive staff revealed compliance with the PREA, and that other safety and security issues are always a primary focus when they consider and reviewing their respective staffing plans. The facility has a Staffing Report that is developed for each pay period. The Jail administrator meets weekly with her executive staff with operational needs, including addressing staffing issues related to the PREA. The institution has been provided with all necessary resources to support the programs and procedures to ensure compliance with the PREA standards. The audit included an examination of all video monitoring systems, staff interviews, and rosters. Supervisory and Administrative staff members routinely make unannounced rounds covering all shifts, and these rounds are documented. PREA rounds are documented in operations lieutenants' logs and at the officer's stations logs for housing units.

There has been no deviation from the staffing plan based on interviews with facility administrator and PAQ.

115.13 (c): The Jail Administrator, PREA compliance manager, and sheriff review the operation of the facility for the previous year to determine needs for staffing, mirror, or additional cameras. It also included a review of the population based on reduction in the utilization of the center. The center has reduced its population by closing several living units. At the time of the audit the jail has housing for 109 inmates and is operating at an average capacity of 86 inmates. There have been no judicial findings of inadequacy from federal investigative agencies or findings of inadequacy from internal or external oversight bodies relevant to this standard. All essential posts are filled each shift, and non-essential posts are kept open for salary savings. When programs are offered, staffing is increased to provide additional supervision. The shift supervisors and jail administrator conduct unannounced rounds throughout the

	<p>facility each shift or daily. An examination of policy and supporting documentation and all interviews confirm compliance with this standard. Compliance was determined by staff interviews conducted during the tour of all areas of the facility, including human resource manager and correctional staff; reviews of documented staffing rosters, daily supervisory checks, and facility workforce quarterly meeting records; pay period staffing reports and the examination of the video monitoring system.</p> <p>115.13 (d): According to facility KCJ Policy facility executive staff and intermediate and higher-level custody supervisors conduct and document unannounced rounds on all shifts within their respective areas to identify and deter employee sexual abuse and sexual harassment. Policy also mandates that other staff are prohibited from telling other staff when supervisors are making unannounced rounds. The review of Institution unannounced PREA rounds logs confirmed that intermediate-level or higher-level supervisors, including shift supervisors and department heads, conduct and document such visits throughout the institution, during the day, at night and on the weekends. Additionally, the shift supervisors were interviewed. Supervisors indicated they are mandated to conduct unannounced rounds at the beginning of shift, during the shift and at the end of each shift. The supervisors document the visits on logbooks located in housing unit control room. Staff members interviewed verified they are prohibited from alerting other employees regarding unannounced rounds. Interviews with inmates and housing unit officers also confirmed that random, unannounced rounds are conducted by Institution Duty Officers daily, including nights and weekends.</p> <p>All unannounced rounds are documented in the housing unit logbooks. A review of the logbook and tour of the facility confirmed that staff are assigned to the living units, supervisor make rounds and documentation is found in control room logbooks.</p> <p>An examination of policy and supporting documentation and all interviews confirm compliance with this standard.</p>
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115.14	Youthful inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>KCJ does not house youthful offenders. Compliance was determined by review of the inmate rosters, and interviews with intake staff, facility PREA Coordinator and Jail Administrator.</p>

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard

Auditor Discussion

The following policies, directives and documentation was reviewed in formulating compliance with this standard:

KCSD Policy 514 Searches

KCSD Policy 806 Inmate Hygiene

Training records- Cross Gender Pat Searches & Searches of Transgender & Intersex Strip Search Log

Shift Logs- Announced gender presence

PAQ

115.15 (a): KCSD Policy 514 Searches mandates that cross-gender strip or cross-gender body cavity searches are prohibited, except in exigent situations or when performed and documented by a medical practitioner. All staff confirmed they are not allowed to conduct cross-gender searches except in exigent circumstances. Staff were able to articulate what an exigent circumstance would entail.

115.15 (b): The facility house male inmates. The facility maintains a log of all strip searches by female staff or transgender inmates by non-preference staff. This log indicates date, time, purpose and offender's gender and gender of persons conducting the strip searches. The logbook was provided, however there were no entries in the logbook.

115.15 (c): The facility does not female inmates.

115.15 (d): KCSD Policy 806 Inmate Hygiene 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. The living areas showers have curtains that provide for inmate privacy while showering. During the tour of the facility, it was noted that all showers had curtains or stalls. The medical area has a wraparound curtain for privacy during examinations. All toilets in the living units have partitions and a wall in front of the toilet to provide privacy. All other areas that were reviewed during the tour had partitioned or single toilets with a door to provide privacy.

All inmates stated they can shower, use the toilet, and change clothes without being seen by staff members. The facility has a policy that all opposite gender staff working the units will announce themselves prior to walking the range to allow inmates the opportunity to prepare themselves from a privacy perspective. Inmates interviewed acknowledged they were allowed to shower, dress, and use the toilet without being viewed by staff of the opposite gender. Postings are located throughout the living units that female staff are assigned to work in housing units.

115.15 (e): KCSD Policy 514 Searches address searches of transgender and intersex

	<p>inmates. Facilities shall not search or physically examine a transgender or intersex inmate solely to determine their genital status. If the genital status is unknown, it may be determined during private conversation with the individual, by reviewing medical records or by learning this information as part of a broader medical examination conducted in private by a medical practitioner. At the time of the onsite audit, there no inmates who disclosed being transgender or intersex. In interviews each indicated the facility were aware that they were transgender when they arrived at the facility.</p> <p>115.15 (f): All staff at KCJ receive training on how to conduct cross-gender pat searches and searches of transgender and intersex inmates in a professional and respectful manner. Staff receive Limits to Cross Gender Viewing & Searches training. The lesson plan of this training was provided for review. Staff sign a PREA Basic Acknowledgement form acknowledging receipt and understand of the training received.</p> <p>During the initial tour and whenever the auditor went into the living units to conduct interviews, female staff announce their presence. Inmates that were in the shower area were not visibly naked to any staff and remained in the showering area while the auditor and staff visited the area. Inmates interviewed indicated they are not seen naked by staff of the other gender and would not be naked in view of staff.</p> <p>There were no cameras that provided a view of the showering and dressing areas in any of the living units and medical examination rooms.</p> <p>Based on the review of policies and notices regarding the presence of female staff in the units, completion of corrective action plans for the partitions and retraining of staff it has been determined that KCJ is in compliance with this standard.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Policy 606 PREA</p> <p>Language Line Contract for Services</p> <p>Inmate Handbook</p>

PREA video with closed caption

TTY telephone service

Staff training logs

115.15 (a) (b) KCSD Policy 606 PREA mandate that inmates with disabilities and inmates who are limited English shall not discriminate against offenders with known disabilities and shall provide reasonable accommodations to ensure access to programs, activities, and services in accordance with the Americans with Disabilities Act and the provisions established in this Directive.

PREA Policy maintains that the staff will respond to the needs of inmates with disabilities or limited English proficiency. Upon identifying an inmate with a disability that prevents them from reading or understanding inmate PREA educational materials, staff conducting initial intake screenings coordinate with other staff as needed to obtain appropriate accommodations addressing the inmate's disability (i.e., referral to medical as appropriate).

Through policy and practice, the facility staff ensures that inmates with all disabilities listed in 115.16a have an equal opportunity to participate in and benefit from all aspects of the facility's efforts to prevent, detect and respond to sexual abuse and sexual harassment. The disabled inmates interviewed stated they were instructed about PREA compliance and felt safe from sexual abuse. All PREA related information (written information), including postings, brochures, and handouts, are available in English and Spanish, and other languages. Staff also may read information to inmates when necessary.

The PREA training video includes closed captions for hard of hearing inmates. Intake staff advised that during the processing of inmates, the intake staff and medical assess the inmate's ability to understand information provided and questions that are part of the booking process. Each inmate is then referred to medical or mental health for information that will determine the resources that will be required to aid in conducting the PREA screening and initial training. Through contracting services, closed caption videos, readers, TTY equipment and access to community and facility resources the facility meets the mandates of this standard. The Mental Health staff indicated that the facility does have cognitively dysfunctional inmates, and in those cases, she assists in the interviewing, screening and initial PREA training of inmates. There were not cognitively dysfunctional inmates during the audit period.

115.16 (c) KCSD Policy 606 PREA state the facility does not rely on inmate interpreters, inmate readers, or other types of inmate assistants to perform first responder duties or during the investigation of an inmate's sexual abuse/sexual harassment allegations. Interviews with first responders, medical, mental health, and investigative staff confirmed their awareness of the prohibition of using inmate

	<p>interpreters for PREA compliance functions.</p> <p>Along with the contracting medical services, the facility can also utilize the Kendall County Health Department to identify appropriate community resources for deaf and blind inmates. Interviews with staff and inmates and examining policy/supporting documentation also confirm compliance with this standard. Compliance with this standard was also confirmed by reviewing Agency Policy, Institutional supplement, contracting services for language interpretation services, and interviews with staff and disabled inmates.</p> <p>Compliance of this standard was confirmed by review of agency policy, contracting services for language interpretation services and interviews with PCM, Case Manager Supervisor, Medical Administrator and LEP inmates.</p>
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115.17	Hiring and promotion decisions
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>Merit Commission Rules - Hiring and Promotion Decisions</p> <p>KCJ Policy 103 Special Assignments and Promotions</p> <p>KCJ Policy 302 Recruitment and Selection</p> <p>Volunteer application</p> <p>Promotional and Merit Commission</p> <p>Mandatory Background Form 2023</p> <p>Memo of Background Annual Appraisals</p> <p>Employee Questionnaire</p> <p>PAQ</p> <p>115.17(a): KCJ Policy 302 Recruitment and Selection stipulates all employees, contractors and volunteers have had criminal background checks completed prior to being employed by KCJ. The facility does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor or volunteer that may have contact with inmates, who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution; 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</p>

victim did not consent or was unable to consent or refuse, or if the person has been civilly or administratively adjudicated to have engaged in the activity. Incidents of sexual harassment are considered in determining whether to hire or promote anyone or to enlist the services of any contractor or volunteer who may have contact with inmates. Interview with the Human Resource Manager and review of random employee, contractor and volunteer files were used to verify compliance to this standard.

115.17(b): The facility will consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates. Interview with the Human Resource Manager and review of the disclosure form confirmed this practice.

115.17 (c): The agency requires that all applicants and employees who may have contact with inmates have a criminal background check. Criminal background checks for all potential employees are completed through the Kendall County Sheriff's office for those considered for promotions or who transfer from another facility, an internal verification and background is completed. If an applicant answers their application, they are a prior institutional employee, information from prior institutional employers shall be requested. According to the Pre-Audit Questionnaire, in the past 12 months, there were 3 background checks completed.

115.17 (d): The facility performs criminal background checks through the Sheriff's office before enlisting the services of any contractor or volunteer. In information provided on the Pre-Audit Questionnaire, in the past 12 months there were 3 criminal background checks conducted for staff and 1 background check for a contractor. The auditor reviewed 8 staff personnel files and 1 contractor's background and found they had background checks completed prior to employment.

115.17 (e): A review of random staff and contractors with five years tenure verified that criminal background checks are conducted every five years for all employees and contractors. The jail conducted an annual background check on all staff to ensure compliance with five year tenure.

115.17 (f): KCJ asks all applicants and employees who have contact with inmates directly about previous sexual misconduct. The application for employment was revised as part of the corrective action plan. All new applicants are asked these questions on the application. Employees and contractors complete a PREA Disclosure and Authorization Form - Annual Performance Evaluation annually. For consideration for promotions or transfers, employees complete a PREA Disclosure and Authorization Form Promotions.

115.17 (g): Employees and contractors have a duty to disclose such misconduct referenced in this standard. Material omissions regarding this type of misconduct would be grounds for termination. The submission of false information by any applicant is grounds for not hiring the applicant.

115.17 (h): Unless prohibited by law, KCJ will provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon

	<p>receiving a request from an institutional employer for whom the individual has applied for work.</p> <p>Compliance was determined by pre audit documentation, the PAQ, interviews with the human resources director and review of random staff files including new hires, promotions and five-year tenured staff and contractor files and corrective action plan to include application, promotion and yearly appraisals including the PREA questionnaire.</p>
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115.18	Upgrades to facilities and technologies
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCJ Policy 606</p> <p>Camera Inventory</p> <p>KCJ Policy 606 mandates the jail will consider the effect of new or upgraded design, acquisition, expansion, or modification of physical plant or monitoring technology might have on the facility’s ability to protect inmates from sexual abuse. In interviews with the facility administrator, the facility has replaced older cameras that are no longer functional with new high definition and pivoting cameras.</p> <p>During the last 12 months the south wing of the jail has been closed due to a reduction in population.</p> <p>Compliance was determined by review of facility camera coverage and interviews with Agency Head and facility administrator. A tour of the facility and review of the cameras and additional mirrors has minimized the blind spots throughout the facility.</p>

115.21	Evidence protocol and forensic medical examinations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCJ Policy 606 PREA</p>

MOU with Mutual Grounds, Inc.

Medical Staff Training

Sexual Assault Brochures

Kendall County Investigative Policy and Protocol.

Coordinated response plan.

PAQ

115.21 (a): Kendall County Investigative Policy and Protocol mandate that the Kendall County Sheriff's Office Detective as the primary investigative organization within the KCSD. Investigations involving law enforcement staff (jailers) are referred to the Illinois State Police for investigations. The sheriff's office Detective has received training on conducting sexual abuse investigations in a confinement setting and is the primary lead Detective on sexual assault cases in the community.

115.21(b)(c): The agency follows a uniform evidence protocol described in the U.S. Department of Justice's Office on Violence against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents." Victims of sexual assault are referred to health services for initial examination and treatment. Such treatment would be for life preservation only, and the victim would be transported to a local hospital for examination, treatment, and forensic evidence gathering by a SANE nurse. All sexual abuse advocacy, examinations, treatment, testing, and follow-up care are provided without cost to the victim. The Jail has an MOU with Mutual Ground to provide victim advocacy services. As part of the MOU advocacy program provided victim advocates to accompany or met with detainees at the hospital. The jail can utilize Copley Hospital or Edwards Hospital for SANE forensic examinations. Mutual Grounds provides victim advocate services, follow-up care beyond the abuse, and will provide services if the incident happened prior to incarceration. The facility also has posted in both English and Spanish the Rape Hotline numbers. As part of their comprehensive response plan, the victim has multiple avenues that would allow someone to attend the exam with them.

In information reported on the Pre-Audit Questionnaire, in the last 12 months there were one SANE exam performed.

115.21 (d)(h): The Jail has an MOU with Mutual Ground to provide victim advocacy services. As part of the MOU advocacy program provide victim advocates to accompany or met with detainees at the hospital.

A review of training records confirmed that internal investigative unit staff had received appropriate investigator training on investigating sexual abuse and harassment in a confinement setting. Interviews with staff, local hospital nurse, local rape crisis center advocate, and an examination of documentation confirmed compliance with this standard. Correctional and medical staff members were interviewed concerning this standard, and all were knowledgeable of the procedures required to secure and obtain usable physical evidence when sexual abuse is alleged.

	<p>Staff members were also aware of the staff responsible for conducting PREA investigations.</p> <p>The auditor contacted the victim advocate program and was advised they would provide victim advocacy services. The MOU details the victim advocacy program providing an advocate to accompany inmates that are victims of sex abuse and includes the qualification of the victim advocate and the services they would provide. The staff interview indicated they have staff on call to accompany victims of sexual abuse to forensic examination and they have a working relationship with the Jail and hospital. In order to provide sexual assault advocate services, the center staff indicated that volunteers must attend specialized training.</p> <p>115.21 (e): The Hospital staff indicated they would notify the victim advocate program at Mutual Grounds to meet with the victim prior to the examination and the victim advocate would accompany the victim for any law enforcement interviews. The staff at the hospital indicated that this is the standard protocol for all victims of sexual abuse in Kendall County.</p> <p>15.21 (f): Based on interviews with KCJ facility administrator, outside Law Enforcement conducts all criminal investigations. The investigators are trained investigators and follow the requirements of paragraphs (a) through (e) of this section.</p> <p>Compliance of this standard were confirmed by review of the policies, statement of fact, PAQ, investigative files and interviews with the Medical Center, Victim Advocate, investigators, PREA coordinator, and Jail Chief of Operations.</p>
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115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Policy 606 PREA</p> <p>KCSD PREA Operational Plan</p> <p>115.22 (a): KCJ Operational plan and policy 606 outlines the agency's policy and procedures for investigating and documenting incidents of sexual abuse and sexual harassment. The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.</p> <p>In the past 12 months there was 9 allegations of sexual abuse/ sexual harassment received. Of these investigations 4 were for inmates received from other facilities. There was one allegation that was forwarded for a criminal investigation. All</p>

	<p>allegation included an administrative investigation.</p> <p>115.22 (b): When required, the facility investigators refer sexual abuse investigations (criminal violations) to the sheriff's office detective who follows the standard's requirements. The sheriff's office has several trained investigators; however, the agency utilizes one detective that has extensive training in conducting sexual assaults, domestic violence, and training on conducting investigation in a correctional setting. Allegations of Sexual Abuse by a certified jail staff are investigated by the State Police.</p> <p>115.22 (c): In interviews with the PREA coordinator and agency head the sheriff's office and the center maintain the information of investigation protocol at the sheriff's office and at the facility. The auditor was provided with a copy of the information provided to the public upon request.</p> <p>Compliance was determined by review of investigations, policy, statement of fact, and interviews with investigator, agency head, PREA coordinator, PREA compliance manager and facility administrator.</p>
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115.31	Employee training
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Prison Rape Elimination Act Acknowledgement Report</p> <p>Training Curriculum and electronic training verification</p> <p>KCSD Policy 310 PREA Training</p> <p>Corrections One Academy Course # 18155-1811 Prison Rape Elimination Act</p> <p>Training Certificates</p> <p>KCSD Policy 310 PREA Training</p> <p>KCSD Employee Brochure</p> <p>KCSD PREA Training Facilitators Guide</p> <p>PREA Procedure Acknowledgement</p> <p>Training on Communicating with LGBTI</p> <p>Six Monthly Refresher Training Scenarios</p>

115.31 (a): All staff are provided training which includes information on all areas of PREA training and protocol for sexual abuse prevention, intervention, reporting, protecting the inmates, and preserving the possible crime scene.

The jail operations training which includes:

- § A zero-tolerance policy for sexual abuse and sexual harassment.
- § How to fulfill staff responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures.
- § Inmates' right to be free from sexual abuse and sexual harassment.
- § Employees' right to be free from retaliation for reporting sexual abuse and sexual harassment.
- § Dynamics of sexual abuse and sexual harassment in confinement.
- § Common reactions to sexual abuse and sexual harassment victims.
- § How to detect and respond to signs of threatened and actual sexual abuse.
- § How to avoid inappropriate relationships with inmates.
- § How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates.
- § How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.
- § How to conduct Cross-Gender Pat Searches.

Newly hired employees receive training relative to PREA standards during their initial training in a classroom setting. The facility conducts training annually biannually and monthly refresher training. The training is conducted in the classroom training.

115.31 (b): KCJ Policy 606 recognizes that the facility housed male and female inmates and training is tailored to this population. At the present time the jail does not house female inmates, however, the training is still part of the annual and monthly training. Policy mandates that the facility will be required to modify training to meet the needs of a different population. Staff assigned to specialized Post such as transportation officers, supervisors, and investigators receive additional training.

115.31 (c): According to the random staff files reviewed and sign in sheet for staff training, all staff have received training in the last 12 months. Staff received formal refresher training as part of a corrective action plan following an allegation of sexual abuse. Additional training was conducted after the audit for cross gender shake down and notification of staff in the living unit. Staff interviewed indicated they had received additional refresher training monthly that include scenarios.

115.31 (d): Upon completion of PREA pre-service and annual in-service training, staff

	<p>sign a an CBDC Acknowledgement of Receipt of Training and Brochures. They also sign a PREA Basic Acknowledgment Training form upon completion of general PREA training and a Cross Gender Pat Searches & Searches of Transgender and Intersex acknowledgment form.</p> <p>A review of the training curriculum, training sign-in sheets and other related documentation, as well as staff interviews, confirmed staff are required to acknowledge, in writing, not only that they received PREA training, but that they understood it. A review of documentation and staff interviews further confirmed that the facility exceeds compliance with this standard. The auditor reviewed 12 staff training records including the facility director, PCM, shift supervisor, investigator, medical and random staff.</p>
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115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Policy 310 PREA Training</p> <p>Advanced Medical Service Training Certificates</p> <p>NIC Training Program for Medical and Mental Health Staff</p> <p>PREA Volunteer Brochure</p> <p>Signed acknowledgement of understanding training</p> <p>Facilitator guide to Volunteer Training</p> <p>115.32 (a): Contractors and volunteers are provided training relative to their duties and responsibilities. Kendall County contracts with Advanced Correctional Health Services for medical and mental health services. The contractors utilize NIC specialized training for mental health and medical staff that includes PREA basic and specialized training for medical and mental health staff. Volunteers are provided training by the agency training officer utilizing the Volunteer Training Program. All contract and volunteer staff are required to receive PREA training annually. A review of the training curriculum, training sign-in sheets, other related documentation, and staff interviews confirmed staff are required to acknowledge, in writing, not only that they received PREA training but also that they understood it. A review of</p>

	<p>documentation and staff interviews, including lead nurse and food service supervisor, and facility's training officer, confirmed that the facility is compliant with this standard. There were 29 contractors or volunteers trained in the last 12 months.</p> <p>115.32 (b)(c): All fulltime contractors receive the same PREA training as employees prior to assignment and sign a PREA Basic Acknowledgement Form and an Acknowledgement of Receipt of Training and Brochures Sexual Assault Prevention form. The volunteer/contractor training curriculum was provided for review. The training included 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. The center has 22 trained volunteers and 7 trained contractors.</p> <p>A review of contractor training files confirmed compliance with the standard. Interviews with two contractors further confirmed compliance with this standard</p>
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115.33	Inmate education
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Policy 310 PREA Training</p> <p>KCJ Policy 606 PREA</p> <p>KCSD Prison Rape Elimination Act Acknowledgement Report</p> <p>English Inmate Handbook</p> <p>PREA Inmate Training Acknowledgement</p> <p>Zero Tolerance Notification</p> <p>Signed acknowledgement of understanding training</p> <p>Inmate files reviewed.</p> <p>115.33 (a): KCJ Policy 606 PREA, interviews with inmates and staff indicated that inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment and explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment. As part of the intake process inmates view a PREA information video and staff explain the PREA information to all detainees that are booked into the jail. Inmates that have been at the facility for some time indicate they received additional training and viewed a video. Every 25 to 28 days the</p>

PREA compliance manager or other trained staff have a PREA training program for all inmates that have been at the facility for more than three days and less than 30 days. The Classification Officer maintains a spreadsheet on all inmates including date of arrival, date of initial training and date of formal training. The Offender handbook provides an overview of the PREA standards requirements detailed in the training standard and extensive information on the services offered by the Mutual Support advocacy program. The additional requirements for compliance with the standard include that all inmates are required to acknowledge in writing they have received PREA education. The updated training program includes definitions of sexually abusive behavior and sexual harassment, prevention strategies, and reporting modalities. The jail conducted a PREA audit review and noted there were some inmates that did not receive the training. The center proactively completed a corrective action plan for inmates that had not received the additional training.

115.33 (b): Inmates receive comprehensive PREA education within 30 days of arriving at the facility. Inmates sign the Prison Rape Elimination Act (PREA) Offender Education Program acknowledgement form acknowledging receipt of PREA education. The case manager goes over the training curriculum and the inmate signs an acknowledgement that they have received comprehensive training including the PREA video in a language they understand.

115.33 (c): All residents that arrive at the facility are provided orientation, copy of the resident handbook and PREA victim advocacy brochure. All inmates interviewed during the tour of the facility and inmates formally interviewed by the auditor indicated they received an orientation on the first or second day of their arrival. The residents indicated they provided a brochure, and staff discuss the PREA information while they are in the intake area.

115.33 (d): There is a translation language line available to LEP inmates. During the interview process, randomly selected inmates indicated they received information about the facility's rules against sexual abuse/sexual harassment when they arrived at the facility. They further indicated they were advised about their right not to be sexually abused/sexually harassed, how to report sexual abuse/sexual harassment, and their right not to be punished for reporting sexual abuse/sexual harassment.

115.33 (e): The facility maintains documentation of inmates' participation in PREA education. In review of 15 inmate files there were training records indicating the initial orientation and comprehensive training in all files.

115.33 (f): Throughout the facility were posters including Sexual Assault Prevention and Reporting Posters; These posters were informative and included telephone numbers and addresses. Also Notice of Audit was posted throughout the facility.

Compliance was determined by reviewing the training and acknowledging training and samples of offenders receiving the training.

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCJ Policy 607 Sexual Assault Investigations</p> <p>General PREA Training</p> <p>Training Records for Facility Investigators</p> <p>Description of the NIC Investigation in a Confinement Setting Course</p> <p>115.34 (a): KCJ Policy 607 mandates that in addition to the general training provided to all employees pursuant to §115.31, the agency ensures that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings.</p> <p>115.34 (b): The facility Investigators have completed investigating sexual abuse in a confinement setting and additional online training on investigating sexual abuse. Training includes Investigating Sexual Abuse through NIC training staff. The training curriculum was reviewed and included interviewing sexual abuse victims, proper use of the Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.</p> <p>115.34 (d): The facility has 12 investigators. The agency maintains documentation that the investigator has received specialized training on conducting sexual abuse investigations in confinement settings. Upon completion of the training, investigators receive a certificate of completion. In review of investigators' training files, investigators have completed this specialized training, as well as general training provided to all employees and documentation is maintained by the facility. In an interview of the facility investigators, they confirmed receiving specialized training and general PREA education provided to all employees and were able to confirm the topics included in the specialized training they received.</p> <p>Compliance was determined by review of the training curriculum, investigator training records, investigators certificate of completion, investigative reports, and interviews with PREA Coordinator, Agency Head, investigators, and facility administrator.</p>

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard

	<p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>Kendall County Policy 310 PREA Training</p> <p>Fact Statement of Fact</p> <p>PREA Training Certification Mandatory Pre-Service</p> <p>Nurse Acknowledgment of Receipt of Training & Brochures</p> <p>115.35 (a): The medical and mental health staff at KCJ received generalized training and specialized training through NIC. The training curriculum includes how to detect and assess 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 and sexual harassment, how and to whom to report allegations or suspicions of sexual abuse and sexual harassment as well of many other medical and mental health topics such as clinical interventions, and local policies.</p> <p>115.35 (b): The medical and mental health staff do not conduct forensic examinations.</p> <p>115.35 (c): Staff received a certification on completion for specialized training. They sign an acknowledgement to train the generalized PREA training. There were 5 medical/mental health staff that received training in the last 12 months. Both documents were provided in the pre audit documentation and verified through interviews with nurse and mental health staff.</p> <p>115.35 (d): All medical staff attend the same training as required mandated for employees by §115.31. They sign an acknowledgement statement that they received this training.</p> <p>Compliance was determined by review of the training curriculum, copy of certificate and acknowledgement statement and interviews with two nurses and mental health staff.</p>
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115.41	Screening for risk of victimization and abusiveness
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>Intake Screening Tool</p>

PREA Intake Screenings

KCSD PREA Operational Plan

Classification Plan

KCSD Prison Rape Elimination Act

Screening Records

115.41 (a) KCSD PREA Operational Plan and KCSD Prison Rape Elimination Act establishes policies and procedures governing this standard. All offenders are assessed during the intake screening process for their risk of being sexually abused by other inmates or being sexually abusive toward other inmates. 115.41 (b): The Booking Officer conducts the screening. The screening occurs typically within twenty-four hours, but no more than seventy-two hours, after the inmate's arrival.

115.41 (c) The Booking Officer conducts the screening. The screening occurs typically within twenty-four hours, but no more than seventy-two hours, after the inmate's arrival.

115.41 (d)(e): The screening includes the screener's thorough review of any available records available to assist with determining the inmate's risk assessment. The Intake Sexual Violence Assessment Tool was reviewed. It contains:

- Whether the inmate has a mental, physical, or developmental disability?
- The age of the inmate?
- The physical build of the inmate?
- Whether the inmate has previously been incarcerated?
- Whether the inmates' criminal history is exclusively nonviolent?
- Whether the inmate has prior convictions for sex offenses against an adult or child?
- Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming?
- Whether the inmate has previously experienced sexual victimization?
- The inmate's own perception of vulnerability?
- Perpetrators of sexual abuse during incarceration?
- Prior conviction of violent offenses?
- History of Assaultive Conduct in DOC in the past 5 years?
- Whether the inmate is detained solely for civil immigration purposes

41 115.41 (f): The Classification office performs a 30-day screening on all detainees. Controls are in place to ensure that information received during the screening is only available to staff on a need-to-know basis. The policy prohibits inmates from being disciplined for refusing to answer or not disclosing complete information in response to questions regarding their mental/physical health, developmental disability, sexual preferences, sexual victimization history, and vulnerability perception. Housing and program assignments are made on a case-by-case basis, and inmates are not placed in housing units based solely on their sexual identification or status.

115.41 (g): A inmates' risk level will also be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information. Annually during annual classification review assessments, inmates are reassessed for risk of victimization or abusiveness using the Annual & Reassessment Sexual Violence

	<p>Assessment Tool.</p> <p>115.41 (h): Policy mandates that inmates are not disciplined for refusing to answer any questions or for not disclosing complete information. Interviews with screening staff confirmed they would not discipline or coerce an offender to answer Screening questions.</p> <p>115.41 (i): Only the facility administrator, PREA compliance manager, assistant facility administrator, and case managers have access to screening information.</p> <p>Interviews with the staff that conducts screening indicated that prior to the screening staff review the inmates past history, background documentation and other information provided by the US Marshalls. The intake staff meet with the inmate in a private office that was shown to the auditor during the tour and go over the Intake packet. After explaining PREA initial orientation information the staff then explain the Risk Assessment and why they are conducting the screening. Inmates that have a history of victimization are determined by the screening instrument or by the screeners concern of the inmate’s safety or referred to the mental health staff during this process.</p> <p>Compliance was determined by interview with Classification staff, Mental Health staff and the PREA Compliance Manager and in review of random inmate records. In interviews with inmates, they confirmed they were screened upon arrival at the facility and remembered being asked PREA questions again by their case manager or the PREA compliance manager.</p>
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115.42	Use of screening information
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCJ Policy 606 PREA</p> <p>Bed Locations Form</p> <p>KCJ Operational Plan</p> <p>Transgender Preference Form Screening Reassessment</p> <p>115.42 (a): KCJ Operational Plan explains the use of PREA screening information. The agency uses the information from the risk screening form to make housing, bed, work, education, and program assignments with the goal of separating inmates at high risk of being sexually victimized from inmates with those at high risk of being</p>

sexually abusive. The facility maintains a bed location chart that determines the at-risk inmates and possible predator inmates. The Classification Staff explained that prior to assigning an offender to a bed the intake staff reviews the open beds to determine the rooms that house at risk and possible predator inmates. This same information it utilized in programming and work assignments for inmates. Due to the large number of gang affiliated inmates the facility has four housing units that are utilized to house at risk residents and at the same time manage the gang affiliated inmates. There are no units that are utilized to house gay, transgender, or intersex inmates.

115.42 (b): Individualized determinations are made about how to ensure the safety of each offender. Inmates who score at risk of victimization or abusiveness are referred for further evaluation with the Mental Health provider. Inmates have an option of refusing these services.

115.42 (c): KCJ Policy 606 mandates that making housing and programming assignments for transgender or intersex inmates, the facility will consider on a case- by-case basis whether the placement would present management or security problems. Inmates who self-disclose being gay, bisexual, transgender or intersex are tracked on a LGBTI List that is maintained by the PREA Compliance Manager. Transgender and intersex inmates are housed after meeting with the PREA Compliance Manager, Classification, and Health Services Director. Inmates complete a Statement of Search/Shower/Pronoun Preference Form and documents. At the time of the on-site audit visit, there were no inmates who self- disclosed being transgender or intersex assigned to the facility.

115.41 (d) - (g) A transgender or intersex inmate’s housing and program assignments will be reassessed every six months to review any threats to safety experienced by the offender. Transgender and intersex inmate placement and programming are reviewed as needed, but at least every six months. A transgender or intersex inmates’ own views of their safety is taken into consideration.

Compliance was determined by review of policy and forms, interviews with facility administrator, PREA coordinator, classification staff, mental health staff, and agency head,

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The following policies, directives and documentation were reviewed in formulating compliance with this standard: KCJ Policy 606

	<p>KCJ Operational Plan</p> <p>Statement of Fact</p> <p>PAQ</p> <p>115.43 (a): KCJ Operational Plan and KCJ Policy 606 were used to determine compliance to this standard. The KCJ does not place inmates at high risk for 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.</p> <p>115.43 (b): Inmates placed in segregated housing for this purpose have access to programs, privileges, education and work opportunities to the extent possible. The facility will document and justify any restrictions imposed.</p> <p>115.43 (c): The facility will assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, not to exceed a period of 30 days.</p> <p>115.41 (d): If involuntary segregated housing assignment is made, the facility will document the basis for the facility's concern for the inmate's safety and the reason no alternate means of separation can be arranged.</p> <p>15.43 (e): In cases where involuntary segregated housing is used for longer than the initial 30 days, the facility will review the status every 30 days to determine if ongoing involuntary housing is needed.</p> <p>According to information provided on the Pre-Audit Questionnaire and in interview with the facility administrator, in the past 12 months there has not been a time that an offender found at high risk of victimization or a inmate who alleged sexual abuse was placed in involuntary segregated housing.</p> <p>When interviewed the Facility Administrator reported placement would depend on the an assessment that there was no other alternative available to keep the inmate safe.</p> <p>Compliance was determined by review of policies, tour of the center and interviews with facility administrator, chief of security, PREA coordinator and agency head.</p>
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115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The following policies, directives and documentation were reviewed in formulating compliance with this standard:

KCSD Policy 606 PREA

KCSD PREA Operational Plan

PREA information Posters

Telephone Information

KCSD Inmate Video

KCSD Inmate Handbook

KCSD PREA Brochure

Grievance System

115.51 (a KCSD Policy 606 PREA mandate that facilities provide multiple internal ways for inmates to privately report sexual abuse and sexual harassment, provide multiple internal ways for inmates to privately report retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, provide multiple internal ways for inmates to privately report staff neglect or violation of responsibilities that may have contributed to such incidents. Policies also mandate that a private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials and that the private entity or office allow the inmate to remain anonymous upon request. Inmates are informed in the inmate handbook and a PREA Brochure of the many ways for inmates to make a report. This includes:

Tell any Deputy, Sergeant, Medical Staff or volunteer.

2. Call 630 381 9845 or dial "HELP" from an inmate phone, this is a free, recorded call.
3. Write a request slip
4. Write a note to any staff.
5. Fill out a sick call slip
6. You can dial "CRISIS" from any inmate phone to report to a third party. This is a free unrecorded call.

If you have been sexually abused or sexually harassed and would like to speak to a rape crisis counselor, whether or not you want to report it, you can call:

Mutual Ground by dialing "CRISIS" from any inmate phone.

Or write Mutual Ground at

418 Oak Ave.

Aurora, IL 60506

The auditor called the above numbers from the inmate telephone system and was

able to leave a message on the HELP line and spoke to a victim advocate on the Crisis Line.

115.51 (b): The facility also provides external ways for inmates to report allegations to a public or private agency that is not part of KCJ. Inmates can call an outside agency on the inmate phone system by dialing HELP or calling 630-381-9845 from any telephone. This call can be made without using their name. The auditor called the telephone number and reached a third party for reporting line for sexual abuse or covid information. The line is used to leave a message and the staff will contact the Kendall County Sheriff Office.

115.51 (c): Staff interviewed were aware of the requirement to accept reports made verbally, anonymously and from third parties. All staff interviewed indicated they would document verbal reports immediately and notify the shift supervisor by phone or in person.

115.51 (d): Staff have access to private reporting by calling the Sheriff's Private office or any elected official in Kendall County. This information is provided in the employee handbook.

There are grievance boxes and mailboxes located in each of the housing units and are checked daily. There are grievance forms and staff communication forms located next to the boxes. Inmates interviewed indicated they have access to pencils and are allowed to keep them in their possession.

Compliance was determined by testing the telephone system, reviewing policies and procedure, posters, and the inmate handbook. Compliance was also determined by interviews with inmates, staff, shift supervisors, PREA Coordinator, and facility Director and by calling the above telephone system utilizing the inmate phone system.

115.52	Exhaustion of administrative remedies
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Policy 610 Grievances</p> <p>KCSD Inmate Handbook</p> <p>Review of the grievance log for the reporting period</p> <p>115.52 (a) KCSD policy provides a procedure in place for inmates to submit grievances regarding sexual abuse and the agency has procedures for dealing with</p>

these grievances. Poster located throughout the facility advise resident that they may file a grievance. The inmate handbook explains the process for filing a grievance. Any grievance that alleges sexual abuse, sexual harassment, retaliation for reporting an allegation or for cooperating in an investigation will be immediately forwarded to Investigators and Jail Chief of Operations.

115.52 (b): There is no time limit when a inmate can submit a grievance regarding sexual abuse. KCSO does not impose a time limit on any portion of a grievance that does not allege an incident of sexual abuse. Inmates are not required to use any informal grievance process or attempt to resolve with staff an alleged incident of sexual abuse. Agency policy does not restrict KCSO's ability to defend against a lawsuit filed by an inmate on the grounds that the applicable statute of limitations has expired. The PREA Compliance Manager receives all copies of grievances related to sexual abuse or sexual harassment for monitoring purposes. In interview with the PREA Compliance Manager and information provided on the Preaudit Questionnaire, in the past 12 months there were no PREA related grievances filed.

115.52 (c): KCSO policy provides that inmates have a right to submit grievances alleging sexual abuse to someone other than the staff member who is the subject of the complaint and the grievance will not be referred to the subject of the complaint. If a third-party file a grievance on a inmate's behalf, the alleged victim must agree to have the grievance filed on his behalf.

115.52 (d): A final decision shall be issued on the merits of any portion of the grievance alleging sexual abuse within 90 days of the initial filing of the grievance. Computation of the 90-day time period shall not include time consumed by individuals in the facility in preparing any administrative appeal. KCSO or the facility may claim and extension of time to respond (for good cause) for up to 70 days and shall notify the individual of the extension in writing and provide a date by which a decision will be made.

115.52 (e): Third parties such as fellow inmates, family members, attorneys or outside advocates may assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse and may file on behalf of inmates. The alleged victim must agree to have the request filed on his or her behalf; however, he/ she is not required to personally pursue any subsequent steps in the administrative remedy process. If the inmate declines to have the request processed on his or her behalf, the agency shall document the inmate's decision. In an interview with the PREA Compliance Manager and on information provided in the Pre-Audit Questionnaire, in the past 12 months, there were no grievances filed by a third party.

115.52 (f): KCSO policy provides inmates may file an emergency grievance if he/she is subject to substantial risk of imminent sexual abuse. After receiving an emergency grievance of this nature, the facility administrator or designee will ensure that immediate corrective action is taken to protect the alleged victim. An initial response to the emergency grievance to the individual is required within 48 hours and a final decision will be provided within five calendar days.

In an interview with the PREA Compliance Manager and on information provided on

	<p>the Pre-Audit Questionnaire, in the past 12 months, there were no emergency grievances alleging sexual abuse filed.</p> <p>Inmates are provided with grievance forms, pencils and drop boxes to deposit the grievance. The locked grievance box is checked daily by the grievance coordinator. Any grievance that alleges sexual abuse or sexual harassment is immediately forwarded to the PREA compliance manager and the trained sexual abuse investigator. Emergency grievances are immediately delivered to the facility assistant administrator or facility administrator. All inmates were aware of the facility grievance system and how to file a grievance including an emergency grievance.</p> <p>115.52 (g): A inmate can be disciplined for filing a grievance related to alleged sexual abuse if it is determined that the inmate filed the grievance in bad faith.</p> <p>Compliance was determined by review of the policies, grievance, and by interviews with grievance coordinator, KCSD PREA coordinator, and facility administrator.. There were no grievances filed by inmates in the last 12 months and no extension was necessary in the last 12 months.</p>
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115.53	Inmate access to outside confidential support services
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD PREA Operational Plan</p> <p>Inmate Handbook</p> <p>MOU Mutual Ground Inc.</p> <p>Victim Advocate Brochure</p> <p>Victim Advocate Posters</p> <p>115.53 (a): KCSD PREA Operational Plan addresses the agency/facility's policies on providing inmates with access to outside victim advocates for emotional support services related to sexual abuse. KCJ enables reasonable communication between the inmates and these agencies in a confidential manner. The facility has MOU Mutual Ground Inc.</p> <p>The program was contacted and indicated they would provide emotional support for the inmate population by telephone or mail. When called from the inmate phone system by dialing Crisis, the staff asked if I wanted to talk to someone about</p>

	<p>emotional support and she forwarded the call to a counselor at the center. The counselor was bilingual and first asked if I was English and Spanish. She then told me the options to talk. She explained that our call was not being listened to, however she had a responsibility to report any sexual abuse at the jail to the local law enforcement.</p> <p>115.53 (b)(c): Inmate's PREA Handbook and the jail PREA Brochure provides a phone number and address of the victim advocate and emotional support center. The handbooks also provide a statement that staff will not monitor these calls, however staff at the center are mandated reporters apply to limits to confidentiality under relevant federal, state or local law. Posters are located with the address and phone number of Mutual Ground Inc. throughout the jail.</p> <p>Compliance was determined by review of handbook; an MOU including a call to the advocate program by the auditor and interviews with the facility PREA compliance manager.</p>
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115.54	Third-party reporting
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Prison Rape Elimination Act</p> <p>KCSD Inmate Handbook</p> <p>KCSD PREA Operational Plan</p> <p>Kendall County Sheriff's Office Website Indicating 3rd Party Reporting</p> <p>PREA Brochure</p> <p>115.54 (a): Reporting Posters are visible in all areas of the jail, however they are specifically placed in the visitation room, lobby and are found in the inmate handbook and PREA Brochures. Third Parties can call the Kendall County Hotline, visit the https://www.kendallcounty.gov/offices/sheriff/corrections/prea.</p> <p>Compliance was determined by review of the postings, and interviews with random</p>

	inmates, PREA coordinator, and facility Chief of Operations.
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115.61	Staff and agency reporting duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation was reviewed in formulating compliance with this standard:</p> <p>KCJ Policy 606 PREA</p> <p>Specialized medical training.</p> <p>KCSD Jail PREA Operational Plan</p> <p>Illinois Vulnerable Persons Staff Report</p> <p>115.61 (a): It is the policy of the Kendall County Jail to establish effective procedures that ensure the safety and wellbeing of all staff and inmates. All employees at the Jail will be trained in ways to identify and subsequently prevent sexually assaultive behavior among inmates housed at this facility. All staff and inmates are responsible for being alert to signs of potential situations in which sexual assaults might occur. All staff is responsible for immediately referring cases of sexual abuse/assault when they become aware of it to the appropriate medical, psychological and security staff. All staff is expected to handle allegations of sexual abuse/assault sensitively and non-judgmentally. This policy prohibits sexual conduct between Employees, Volunteers, Contractor, and inmates regardless of consensual status and is subject to administrative and criminal disciplinary sanctions. This prohibition includes conversations or correspondence of a romantic or sexual nature. All Employees, Contractors, and Volunteers are expected to have a clear understanding that the Kendall County Jail strictly prohibits any type of sexual relationship with an inmate. This shall be considered a serious breach of the Standards of Employee Conduct, Volunteer Agreements, Contractor Agreements, and these relationships will not be tolerated.</p> <p>115.61 (b): Policy and training mandates that apart from reporting to designated supervisors, staff are not to reveal any information related to a sexual abuse report to anyone. Staff, volunteers, and contractors interviewed knew this information is to be kept confidential and knew whom to report allegations.</p> <p>115.61 (c)(d): Medical specialized medical training includes medical staff are required to report sexual abuse and to inform inmates of their duty to report and the limitations of confidentiality at the initiation of services. The training also provides reporting of a vulnerable adult under a State or local vulnerable persons statute, under applicable mandatory reporting laws. The facility does not house inmates</p>

	<p>under the age of 18. Medical and mental health staff interviewed confirmed this practice. The Nurse indicated that the inmates sign a statement that includes her limitation of confidentiality.</p> <p>115.61 (e): In interview with the facility administrator and his executive team, KCJ reports all allegations of sexual abuse and sexual harassment, including third party and anonymous reports to facility investigators, Facility Administrator, Sheriff's Office and PREA coordinator. If the incident involves a USMS inmate, the facility administrator would notify the USMS.</p> <p>According to the statement of fact there have been no reports from third parties, contractors, or volunteers in the last 12 months. During the tour of the center random residents and staff indicated they knew the reporting responsibilities. All knew they could utilize the telephone to make a report and they could do so without giving the recipient of the call their name, or position at the center.</p>
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115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD PREA Operational Plan</p> <p>KCSD Policy 606 Prison Rape Elimination Act</p> <p>Offender Protection Investigation</p> <p>115.62 (a): KCSD policies and operational plans mandate that offenders will immediately be protected from interviewed staff members aware of their duties and responsibilities when they become aware or suspect an inmate is sexually abused or sexually harassed. All staff indicated they would act immediately to protect the victim, including separating the victim/predator, securing the scene to protect possible evidence, preventing the destruction of potential evidence, and contacting the shift supervisor and medical staff. The classification team and intel staff work continuously to manage the jail population. In the past 12 months, no instance in which agency or facility determined that an offender might be subject to a substantial risk of imminent sexual abuse. The jail administrator interviewed indicated that if a inmate were in imminent danger at the jail due to sexual abuse or other areas such as gang leaders, the jail would reach out to other jails to provide accommodation for the inmates as a last resort.</p> <p>Compliance was determined by reviewing the facility operating policies and</p>

	<p>interviewing classification staff and other staff during the facility's on-site tour. Further compliance was determined by interviews with the PREA Coordinator and Jail Administrator.</p>
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115.63	Reporting to other confinement facilities
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD PREA Operational Plan</p> <p>KCSD Policy 606 Prison Rape Elimination Act</p> <p>Investigation Files</p> <p>Notification to sending facility administrator.</p> <p>115.63 (a)-(c): KCSD PREA Operational Plan on receiving an allegation that an inmate was sexually abused while confined at another facility, the incident will be reported to the PREA Coordinator. The facility administrator will notify the agency or facility head where the abuse is alleged to have occurred. but no later than 72 hours of receiving the allegation. The PREA Coordinator will maintain documentation that notification was made and include all actions taken regarding the incident. Copies of this documentation will be forwarded to the PREA Coordinator and Sheriff's Office. KDJ will begin an investigation as soon as possible after the allegation is reported.</p> <p>115.63 (d): There were 4 allegations from inmates received from another institution. There was no allegation from other facilities involving inmate while housed at KCJ. Based on a review by the auditor, all allegations were investigated and appropriate notification were completed.</p> <p>Compliance was determined by review of the policy and interviews with intake staff, PREA compliance manager, agency head and facility Administrator.</p>

115.64	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p>

	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD PREA Operational Plan</p> <p>KCSD Policy 606 Prison Rape Elimination Act</p> <p>Offender Protection Investigation</p> <p>Confinement Setting Sex Abuse Investigation Protocol</p> <p>115.64 (a): KCSD Policy 606 Prison Rape Elimination Act and staff training requires that correction staff that are the first responders of a sexual assault shall: Separate the alleged victim and abuser, Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, 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, 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. Notify the shift supervisor by telephone or in person and tell only those staff who need to know about assisting you in carrying out these responsibilities. All random staff were able to articulate their responsibilities and have received training on preserving and protecting the crime scene.</p> <p>115.64 (b): Staff training requires that non correctional staff that are first responders are required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff. All contracting and non-contact staff that were interviewed knew their duties and reported they received training during the yearly in service and on reminder training that is sent out by the PREA compliance managers from time to time. During the last 12 months was one allegation of sexual abuse. There was not appropriate time to collect evidence and conduct a SANE on the victim. The investigation was referred to Kendall County Law Enforcement Detectives to be investigated.</p> <p>Compliance was determined by review of the policies and training and by interviewing non-contact staff during the onsite audit. Further compliance was determined by review of investigative reports, facility checklist of the incident and interviews with the Facility Administrator and PREA coordinator.</p>
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115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

The following policies, directives and documentation was reviewed in formulating compliance with this standard:

KCSD PREA Operational Plan

KCSD Prison Rape Elimination Act

PREA investigations

Staff training

Coordinated Response Plan

115.65 (a): Coordinated Response Plan provides written guidance to staff and administration regarding actions to take and notifications to be made. The facility's written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership. A PREA Incident Checklist for Incidents of Sexual Abuse and Harassment is completed to ensure that all steps of the plan are carried out and proper notifications are made.

Kendall County Jail has a coordinated response plan and trains staff on the plan. There is a folder located in the control office for staff to review to carry out the plan. The plan includes:

- Immediately separate, isolate, and continuously observe the alleged perpetrator and victim until an investigator can see them.
- Notify Shift Command immediately.
- Call another Correctional Officer for assistance.
- If the abuse occurred within a period that still allows for the collection of physical evidence, staff shall request 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 period that still allows for the collection of physical evidence, 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.
- Provide medical assistance for the alleged victim as soon as possible and contact mental health services if needed.
- Take reasonable measures to identify, isolate, and separate witnesses.
- Protect all areas where physical evidence exists; lockdown inmates and secure the crime scene with limited access.
- The scene should be preserved exactly as found unless there is evidence that

	<p>cannot be protected or secured without compromising the facility's safety and security. Take custody of physical evidence, which cannot be secured, and retain it in your possession until it can be transferred to the investigator.</p> <ul style="list-style-type: none"> · Observe all conditions, events, and remarks and record them for your report. · If the first staff responder is not a security member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and then notify security staff. · The Kendall County Jail (KCJ) shall provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmate the mailing address and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations, and for persons detained solely for civil immigration purposes, immigrant services agencies. The KCJ shall enable reasonable communication between inmates and these organizations and agencies confidentially as possible. · The KCJ shall inform inmates, before 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. · The KCSD has a Memorandum of Understanding with Mutual Ground Sexual to assist with treatment for victims of sexual abuse. · Should the victim, refuse or decline medical or mental health services, they shall sign a refusal of treatment form. <p>The auditor reviewed the facility operating policies, observed facility practices, reviewed data and documentation provided by the facility staff, and interviewed inmates and staff during an on-site visit and tour of the facility.</p> <p>Compliance was determined through the review of policy, interviews with the non-correctional staff, correctional staff, medical staff, victim advocate, and conversations with the classification officer, and PREA Coordinator.</p>
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115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The following policies, directives and documentation were reviewed in formulating compliance with this standard:

	<p>Correctional Deputies Bargaining Contract</p> <p>Statement of Fact</p> <p>The facility is part of the sheriff's office bargaining agreements. The Jail administrator was interviewed and verified that the collective bargaining agreement does not 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.</p> <p>KCJ would not enter into a collective bargaining agreement or other agreements that would limit the agency's ability to remove an alleged staff sexual abuser from contact with any offender pending the outcome of an investigation. In interview with the agency head designee, he stated the county would not enter into any collective bargaining agreement that would limit the facility's ability to remove an alleged sexual abuser from contact with inmates pending the outcome of an investigation.</p> <p>Compliance was determined by review of policies, present contract, and interviews with the agency head.</p>
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115.67	Agency protection against retaliation
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD PREA Operational Plan</p> <p>KCSD Policy 606 Prison Rape Elimination Act</p> <p>PAQ</p> <p>Investigative Files</p> <p>115.67 (a): KCJ has as policy to protect inmates who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff. The policy provides procedures to protect individuals. The PREA coordinator has been appointed with the responsibility to carry</p>

out these procedures.

115.67 (b): The procedure states the agency has multiple protection measures, such as housing changes or transfers for inmates, victims or abusers, removal of alleged staff or inmate abusers from contact with victims and emotional support services for inmates or staff that fear retaliation for reporting sexual abuse or sexual

harassment or for cooperating with investigations. If any other individual who cooperates with an investigation expresses a fear of retaliation, appropriate measures to protect that individual against retaliation are put in place.

115.67 (c): Inmates who allege sexual abuse will be monitored by the PREA coordinator (retaliation monitor) and will meet weekly with the alleged victim beginning the week following the incident and continue monitoring for at least 90 days or longer if there is a continuing need. The Chief of Operations will monitor the conduct and treatment of employees who reported staff misconduct or employee witness who cooperate with these investigations every 30 days for 90 days. Retaliation monitoring of inmates is documented on the Protection from Retaliation Form.

115.67 (d): Facility procedure also requires monitoring of inmates includes periodic status checks. The PREA coordinator indicated she would review the monitoring logs on an ongoing basis and randomly will see the inmate during tour to check on his/ her status.

115.67 (e): Retaliation monitoring may be terminated if it is determined that the allegation was unfounded. The Retaliation monitor indicated that while the official monitoring will end, he would continue to check on the inmate for retaliation for making a report.

In interviews with the PREA Coordinator and the Jail Chief of Operations and information provided on the Preaudit Questionnaire, in the past 12 months there were no incidents of retaliation that occurred.

Compliance was determined by review of the monitoring logs, agency policy and procedures, investigative files and interviews with the retaliation monitors and Jail Chief of Operations.

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The following policies, directives and documentation were reviewed in formulating

	<p>compliance with this standard:</p> <p>KCSD Policy 508 Inmate Classification</p> <p>PAQ</p> <p>KCSD Policy 508 Inmate Classification Policy 3.4.4 Protective custody requires involuntary segregated housing may be used only after an assessment of available housing alternatives has shown there is no other means of protecting the inmate. All use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43.</p> <p>The KCJ has not utilized voluntary or involuntary restrictive housing for a PREA related incident or for protection of inmates from sexual abuse in the last 12 months.</p> <p>If an involuntary Restrictive housing assignment is made, the facility affords each such inmate a review every 30 days to determine whether there is a continuing need for separation from the general population.</p> <p>Compliance was determined by review of the PAQ and interviews with the facility administrator.</p>
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115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD PREA Operational Plan</p> <p>KCSD Policy 606 Prison Rape Elimination Act</p> <p>Confinement Setting Sex Abuse Investigation Protocol</p> <p>PAQ</p> <p>115.71 (a): KCSD Policy 606 requires an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment at the KCJ</p>

promptly, thoroughly, and objectively, including third party and anonymous reports. In the past 12 months there were 9 allegations of sexual abuse or sexual harassment that were reported by inmates or third parties. Four of the allegations were received during the intake of inmates from other jail or facilities. All allegations were reported Jail Chief of Operations, Sheriff Office, sending facility when applicable and PREA coordinator The Sheriff's Office has a trained investigator based on interview with the Agency Head. The jail has twelve trained investigators to conduct administrative investigation.

115.71 (b): The facility has 12 trained investigators. The facility investigators have completed specialized training in the investigation of sexual abuse allegations in a confinement setting. The facility provided documentation of completion of specialized investigative training completed by facility investigators.

115.71 (c): It is the responsibility of investigators to gather and preserve circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data. Investigators will interview alleged victims, suspected perpetrators and witnesses and review prior reports of sexual abuse involving the suspected perpetrator.

115.71 (d): When the quality of evidence supports criminal prosecution, the agency will conduct compelled interviews only after consulting with prosecutors. There was one allegations that was investigated by law enforcement personnel.

115.71 (e): The credibility of an alleged victim, suspect or witness shall be assessed on an individual basis and shall not be determined by the person's status as an inmate or staff. An inmate who alleges sexual abuse is not required to submit to a polygraph examination.

115.71 (f): The administrative investigation will include an effort to determine whether staff actions or failures to act contributed to the abuse. The administrative investigation shall be documented by the investigator in a written report and include a description of the physical and testimonial evidence, the reasoning behind credibility assessments and investigative facts and findings. There is one criminal investigation.

115.71 (g): A criminal investigation shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence. The facility shall request a copy of completed investigative reports from the investigative agency. The PREA Compliance manager will be track all allegations of sexual abuse or sexual harassment on the KCSO PREA Tracking Log.

115.71 (h): Substantiated allegations of conduct that appears to be criminal shall be referred for criminal prosecution. According to information reported on the Pre-Audit Questionnaire and in interview with facility investigators, since the last PREA audit there were no allegations of sexual abuse referred for prosecution.

115.71 (i): The agency will retain all written reports as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

	<p>115.71 (j): The departure of an alleged abuser or victim from employment or control of the facility or agency, shall not provide a basis for terminating an investigation</p> <p>115.71 (l): When outside agencies investigate sexual abuse allegations, the facility will cooperate with investigators and will try to remain informed about the progress of the investigation. In interview with the PREA Coordinator, she reported that facilities are required to check in with outside investigators at a minimum of every 14 days and document that contact was made to ensure that requirements such as retaliation monitoring and notices of outcome of investigations are completed as required. In interview with facility investigators, they were knowledgeable of their responsibilities of conducting administrative investigations of all allegations received and knew when to refer allegations that appear to be criminal for criminal investigation.</p> <p>Compliance was determined by review of policy, training curriculum, investigative reports and interview with trained investigator.</p>
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115.72	Evidentiary standard for administrative investigations
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Policy 606</p> <p>Training curriculum</p> <p>KCSD PREA Operational Plan</p> <p>Confinement Setting Sex Abuse Investigation Protocol</p> <p>115.72 (a): Based on Investigator training the facility shall impose no standard higher than the preponderance of evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Based on interviews with investigators; investigators make a finding of Substantiated, Not Substantiated, Unfounded, or Pending Further Investigation. The finding will be made using the standard of proof of the preponderance of the evidence (51 % of the evidence). The Investigator must objectively review all of the evidence which is in favor of or contrary to the finding. The investigator must objectively consider and balance the evidence in favor of or contrary to the finding; and in order to support a finding of sexual abuse or harassment by a preponderance of evidence. Investigator must be convinced that the evidence in favor of the finding outweighs the evidence against the finding, or is convinced that the evidence, when taken as a whole, shows that it is more probable than not that the alleged incident took place in this case.</p> <p>Compliance was determined by review of policy, training curriculum, investigative</p>

	report and interview with trained investigators.
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115.73	Reporting to inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Policy 606</p> <p>KCSD PREA Operational Plan</p> <p>Confinement Setting Sex Abuse Investigation Protocol</p> <p>115.73 (a): KCSD Policy 606 Prison Rape Elimination Act indicate that following an investigation of sexual abuse of a inmate, the inmate shall be informed in writing as to whether the allegation has been determined to be substantiated, unsubstantiated or unfounded. The PREA Compliance Manager is responsible for preparing the Notification of Outcome of Allegation form and presenting it to the alleged victim for his signature. The inmate receives a copy of the form, a copy is placed in the investigative file and a copy is forwarded to the PREA Coordinator office.</p> <p>115.73 (b): According to policy and PREA compliance manager if the facility did not conduct the investigation, the facility shall request the relevant information from the investigative agency in order to inform the offender.</p> <p>115.73 (c): KCJ policy and procedure requires following an offender's allegation that an employee has committed sexual abuse against the offender; the facility is required to inform the offender of the outcome of the investigation. The inmate is to be informed if the staff member is no longer posted within the inmate's unit, if the staff member has been indicted on a charge related to sexual abuse within the facility or if the staff member has been convicted on a charge related to sexual abuse within the facility.</p> <p>115.73 (d): KCJ policy and procedure requires following an offender's allegation that he has been sexually abused by another offender, the agency will inform the alleged victim if the alleged abuser has been indicated on a charge related to sexual abuse within the facility or if the alleged abuser has been convicted on a charge related to sexual abuse within the facility.</p> <p>115.73 (e): All Notification of Outcome of Allegations or attempted notifications are documented and filed in the corresponding investigative file. There have been no notifications provided to the inmates.</p> <p>In interviews with the PREA Coordinator she meets with the inmate and explains the</p>

	<p>outcome of the investigation. This helps inmates know what an unsubstantiated allegation means in layman terms. There were 9 allegations of sexual abuse or sexual harassment in the last 12 months. In each case the inmate was moved prior to the finalized investigation.</p> <p>Compliance was determined by review of the investigative files, agency and facility policy and interviews with PREA compliance managers, investigators, and facility administrator.</p>
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115.76	Disciplinary sanctions for staff
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Policy 606 Prison Rape Elimination Act</p> <p>KCSD PREA Operational Plan</p> <p>Discipline Reports to Law Enforcement</p> <p>115.76 (a): KCSD Policy 606 Prison Rape Elimination Act mandates that staff who engages in sexual abuse or sexual harassment of inmates. As part of the disciplinary process, an investigation will be conducted. After the investigation, an employee could face termination if the act itself rises to the termination level. The decision for discipline is based on several factors, including the alleged victim's claim, employee's past disciplinary record, and sanctions imposed on other staff who engaged in similar action.</p> <p>115.76 (b): Based on policy termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.</p> <p>115.76 (c): Based on interviews with facility administrator and human resources staff disciplinary sanctions for violations of agency policies related to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the act committed, the staff member's disciplinary history and the sanctions imposed for comparable offenses by other staff with similar histories.</p> <p>115.76 (d): All terminations for violations of the agency's policies on sexual abuse and sexual harassment, or resignations, shall be reported to law enforcement and licensing agencies unless the activity was clearly not criminal. In the interview with the facility administrator there were no adverse actions for violation of PREA standards.</p>

	Based on review of policy, interviews with PREA coordinator and facility chief of operations the jail is in compliance with this standard.
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115.77	Corrective action for contractors and volunteers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Policy 606 Prison Rape Elimination Act</p> <p>PAQ</p> <p>115.77 (a): Any contractor or volunteer who engages in sexual abuse/sexual harassment would be prohibited from contact with inmates and would be reported to the appropriate investigator and law enforcement or relevant professional licensing/certifying bodies unless the activity was clearly not criminal in nature. Any contractor or volunteer who engages in sexual abuse even though it was not criminal will be reported to professional licensing/certifying bodies.</p> <p>115.77 (b): In cases that were not criminal in nature, the facility would take appropriate remedial measures and consider whether to prohibit further contact with inmates. During the previous year, there was no incident where a contractor or volunteer was accused of, suspected, or found guilty of sexual abuse or sexual harassment at KCJ.</p> <p>Compliance was determined by review of the volunteer and contractor training and statement acknowledging violation of PREA standards. Also interviews with volunteers and PREA coordinator and facility chief of operations confirm compliance with this standard.</p>

115.78	Disciplinary sanctions for inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>Inmate Handbook</p>

KCSD Policy 600 Inmate Discipline

Inmate Handbook PREA Posters of Zero Tolerance PAQ

115.78 (a): According to KCSD Policy 600 Inmate Discipline, if an inmate is found guilty of engaging in sexual abuse involving another inmate, either through administrative or criminal investigations, the offender will be subject to formal disciplinary sanctions. According to the PAQ, there have been no administrative finding of sexual activity by inmates that resulted in disciplinary action during the last 12 months. All inmates interviewed indicated they were told it was against the rules to participate in any sexual abuse, sexual harassment or sexual activity while at the facility. The inmates are provided a handbook that clearly identifies the facility's rules against sexual activity including consensual activity.

115.78 (b): Sanctions will be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history and the sanctions imposed for comparable offenses by other inmates with similar histories.

115.78 (c): Based on KCSD Policy 600 Inmate Discipline prohibited act the disciplinary process may consider whether an individual's mental disabilities or mental illness contributed to his/her behavior when determining what type of sanction, if any, should be imposed.

115.78 (d): KCJ has mental health staff that would provide counseling to address the reasons or motivations for the abuse. In an interview between the HSA and the Mental Health Provider, they confirmed the facility does not provide ongoing sex abuser interventions designed to address the reason or motivations for the abuse. They do provide mental health services and would review the mental health status of an inmate prior to a disciplinary hearing.

115.78 (e): KCSD policy provides that disciplining an inmate for sexual contact with an employee is prohibited unless it is found that the employee did not consent to the contact with the inmate.

115.78 (f): KCSD policy includes the provision that a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

115.78 (g): The agency prohibits all sexual activity between inmates. Facilities may not deem that sexual activity between inmates is sexual abuse unless it is determined that the activity was coerced by the inmate.

All inmates interviewed were made aware of the rules during the initial intake at the facility.

Compliance was determined by review of the facility policy, review of investigator files, and interviews with the investigator, PREA coordinator, Mental Health staff and jail Chief of Operations.

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115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Policy 606 Prison Rape Elimination Act</p> <p>KCSD PREA Operational Plan</p> <p>Risk Assessment Referral to MH</p> <p>115.81 (a): If during initial PREA screening, the inmate reports prior sexual victimization, whether in an institutional setting or in the community, staff will ensure the inmate will be referred to mental health for further evaluation within 14 days. In review of the 30-day follow-up assessments the offender discloses prior victimization not reported during initial screening, the PREA Coordinator will refer the inmate to mental health for further evaluation. Medical and the Mental Health Provider, according to their professional judgement, determine the nature and scope of these services. In information reported on the Pre-Audit Questionnaire, 100% of the inmates assigned to the facility in the past 12 months who disclosed prior victimization were offered a follow-up meeting with the Mental Health Provider. At the time of the audit, there were no inmates that claimed prior victimization. The auditor reviewed 12 resident screening files and referrals were documented on all inmates that claim prior victimization or were considered to be at risk of victimization.</p> <p>As part of the interviews of inmates included inmates that were considered at risk of victimization by the intake staff including case manager and medical practitioners. Each interviewed indicated that they were seen by the mental health professional during their first 2 days of arriving at the center. None of these at-risk inmates claimed sexual victimization.</p> <p>115.81 (b): Any inmate who reports during initial PREA screening or in follow-up screenings he has previously perpetrated sexual abuse in an institutional setting or in the community will be offered a follow meeting with medical or mental health within 14 days of the screening. There was no inmate that claimed he perpetrated a sexual abuse.</p> <p>115.81 (d): Information related to sexual victimization or abusiveness in an institutional setting is limited only to medical and mental health practitioners and</p>

	<p>other employees as necessary to inform treatment plans, security and management decisions or otherwise federal, state or local law.</p> <p>115.81 (e): Medical and mental health providers obtain consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting unless the victimization occurred when the inmate was a minor. Based on interview with medical provider that coordinates for mental health services inmates who report prior sexual victimization and those who disclose previously perpetrating sexual abuse are being referred for evaluation and consent forms or refusals are being obtained. The mental health practitioner indicated she visits the jail two times a week to see new intakes and to provide other services for inmates assigned to the jail.</p> <p>Compliance with this standard was based on policies, mental health referrals, interview with the medical administrator, intake staff and PREA Coordinator.</p>
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115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD PREA Operational Plan</p> <p>KCSD Policy 606 Prison Rape Elimination Act</p> <p>Medical Screening form</p> <p>PAQ</p> <p>115.82 (a): KCSD PREA Operational Plan and the coordinated response plan provides a procedure for Victims of sexual abuse to receive timely, unimpeded access to emergency medical treatment and crisis intervention services. Medical and mental health providers, according to their professional judgement, determine the nature and scope of these services. At KCJ there are full time medical and part time mental health at the facility. The facility would transport the inmate to Copley Hospital or Edwards Hospital for SANE forensic examinations for SANE services as indicated.</p> <p>115.82 (b): All staff first responders are trained to take preliminary steps to protect the victim and notify medical and mental health practitioners. Both security and no security staff interviewed knew their first responder duties. Forensic exams are not performed by facility medical staff. Inmate victims of sexual abuse are referred to Copley Hospital or Edwards Hospital for SANE forensic examinations for SANE exams.</p> <p>115.82 (c): Inmate victims of sexual abuse while incarcerated are offered timely</p>

	<p>information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. Medical staff indicated that is part of the SANE process and she would follow up when the offender returns to the facility.</p> <p>115.82 (d): Based on review of policy and in interviews with PREA compliance manager all services are provided without financial cost to the victim, regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. During the last 12 months there was no inmate that was transported to an outside facility for a SANE or forensic examination.</p> <p>Based on interviews with the Copley Hospital, and Common Ground Victim Advocates, medical staff and mental health staff the jail is in compliance with this standard.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Policy 606 Prison Rape Elimination Act</p> <p>KCSD PREA Operational Plan</p> <p>Health evaluations</p> <p>Coordinator Response Plan</p> <p>Inmate Handbook</p> <p>115.83 (a): Advanced Correctional Health Care employs medical and Mental Health staff at KCJ. Staff follows and adheres to policies and procedures outlined in the Coordinated Response Plan. And the PREA Operational Plan. The PREA Operational Plan ensures prompt and appropriate health intervention will take place in the event of a sexual assault.</p> <p>115.83 (b): The facility provides victims with medical and mental health care consistent with the community level of care, which was confirmed by interview of the nurse. The facility has full-time medical staff and mental health services two days a</p>

	<p>week with on call mental health staff as needed.</p> <p>115.83 (c)(d): The evaluation and treatment should include follow-up services, treatment plans, and (when necessary) referrals for continued care following a transfer or released These services shall be provided in a manner that is consistent with the level of care the individual would receive in the community and include pregnancy tests and all lawful pregnancy-related medical services where applicable.</p> <p>115.83 (f)(g): Victims shall also be offered tests for sexually transmitted infections as medically appropriate. All services shall be provided without financial cost to the victim. Treatment service a shall be provided to the victims without financial cost regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>115.83 (h): KCSD Policy 606 Prison Rape Elimination Act practice is for the facility to attempt to conduct a mental health evaluation of all known abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate.</p> <p>The center would provide follow up treatment for inmate that had a history of victimization or were victims of sexual abuse.</p> <p>Compliance was determined by review of the KCJ policy, interviews with medical, mental health staff, PREA compliance manager and facility administrator.</p>
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115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Policy 606 Prison Rape Elimination Act</p> <p>KCSD PREA Operational Plan</p> <p>Investigation Files</p> <p>After Action Reviews PAQ</p> <p>115.86 (a) KCSD PREA Operational Plan requires facility to conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation in which the allegation has been determined to be substantiated or unsubstantiated. Within 30 days of the conclusion of the investigation, unless the allegation was determined to be unfounded, a review team, designated by the Chief of Operations, shall review the case and</p>

- a) Determine what may have been the motivation for the incident or allegation, such as, but not be limited to, race, ethnicity, gender, gender identity, sexual orientation, transgenderism, intersex identification, gang affiliation, etc.
- b) Determine if there is a need for changes to policy or procedure; or if factors such as physical barriers or staffing may have enabled the abuse.
- c) Assess whether monitoring technology should be deployed to supplement staff supervision.
- d) The review team shall prepare and submit to the Chief Administrative Officer and facility PREA Compliance Manager a written report of their findings and any improvement recommendations.
- e) Documentation for any recommendation not implemented shall be maintained.

During the last 12 months, the facility has conducted three after action reviews.

115.86 (b): The review is conducted within 30 days of the conclusion of the investigation.

115.86 (c): The Incident Review Committee consists of the Chief of Operations, security supervisor, PREA Coordinator, lead investigator, and nurse.

115.86 (d): The team considers whether the incident was motivated by race, ethnicity, gender identity, perceived status or gang affiliation. The team examines the area where the incident was alleged to have occurred and assesses whether physical barriers in the area may have contributed to the abuse, whether monitoring technology should be deployed or augmented and whether the staffing levels at the time of the incident were adequate. The after-action reports were thorough and contained all elements of the standard and related corrective action plans for each area of the Incident Review Team.

115.86 (e): The facility implemented recommendations for improvement appropriate staff failure action and operational changes in providing supervision of inmates.

Compliance was based on review of after-action reports (IRT) and by interview with the PREA Coordinator and other Incident Review team members. When interviewed, the members of the incident review team knew their responsibilities as they relate to the review of sexual abuse incidents.

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>Kendall Co Jail Activity Report</p> <p>Kendall County Sheriff’s Department Website</p> <p>KCSD Policy 606 Prison Rape Elimination Act</p> <p>KCSD PREA Operational Plan</p> <p>2020 Annual report</p> <p>2021 Annual report</p> <p>2022 Annual report</p> <p>115.87 (a): KCSD PREA Operational Plan mandates that the facility collects uniform data for every allegation of sexual abuse. The facility policy includes clearly defined definitions. The incident-based data collected shall include, at 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.</p> <p>115.87 (b): KCSD Policy 606 Prison Rape Elimination Act mandates that the Facility PREA Coordinator shall be responsible for compiling data collected on Sexual Activity, Sexual Harassment and Sexual Abuse incidents and forwarding statistical reports to the Sheriff and US Marshal Services on a yearly basis.</p> <p>115.87 (c): The data collected, will be at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Bureau of Justice Statistics (BJS).</p> <p>115.287 (d): The agency shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.</p> <p>115.87 (e): This provision of this standard is not applicable to this facility. The jail does not contract for the confinement of inmates.</p> <p>115.87 (f): Upon request, KCJ shall provide such data from the previous calendar year to the Department of Justice no later than June 30. The facility provided a copy of the annual log for review.</p>
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115.88	Data review for corrective action
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion

	<p>The following policies, directives, and documentation were reviewed in formulating compliance with this standard:</p> <p>Annual PREA assessments.</p> <p>115.88 (a): The facility will aggregate that data annually to assess and improve the effectiveness of its sexual abuse prevention, detection and response policies, practices and training by identifying problem areas, taking corrective action on an ongoing basis and preparing an annual report of its findings. The annual report for 2022 compared the reports from 2014 through 2022.</p> <p>115.88 (b): The PREA Coordinator reviews the data collected and the annual report includes a comparison of the current year's data and corrective actions with those from prior years and provides an assessment of the agency's progress in addressing sexual abuse.</p> <p>115.88 (c): The PREA Coordinator forwards the annual report to the Sheriff for his signatures and approval. The report is made public upon request.</p> <p>115.88 (d): Before making aggregated sexual abuse data public, KCJ will remove all personal identifiers.</p> <p>Compliance was determined by review of the center policy, review of the reporting form and interview with the coordinator and Chief of Operations.</p>
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115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The following policies, directives, and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Policy 606 Prison Rape Elimination Act</p> <p>State Record Retention</p> <p>115.89 (a): KCSD Policy 606 Prison Rape Elimination Act mandates all case records associated with claims of sexual abuse are maintained and filed in a secure file cabinet in the PREA compliance manager's office. During the tour of the facility, the auditor noted that the PREA compliance office was locked in each visit by her office. The auditor was required to return all investigative files to the PREA compliance manager when leaving the conference room during the review of investigative files. The auditor noted that all computers in the case manager, medical and mental health areas were closed if no one was in the offices. Interview with case managers indicated they do not have access to investigative files on their database.</p>

	<p>115.89 (b): The Kendall County Sheriff’s office makes all aggregated sexual abuse data from all its facilities made public annually on the Kendall County Sheriff's website. A review of the website confirmed that the agency has PREA reports from 2014, 2017 and 2020. The facility has password protected computer access and only specific staff are allowed to utilize their computers. All staff at the facility interviewed indicated they must go to training in handling sensitive information.</p> <p>115.89 (c): Before making aggregated sexual abuse data public, KCSD removes all personal identifiers. This was confirmed by reviewing past audits and annual reports.</p> <p>115.89 (d): KCSD Policy 606 Prison Rape Elimination Act mandate data collected pursuant to this procedure shall be securely retained by the Facility for at least 10 years or longer if required by state statute. Before making aggregated Sexual Abuse data publicly available, all personal identifiers shall be removed. All case records associated with claims of sexual abuse, including incident reports, investigative reports, offender information, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment and/ or counseling are retained in accordance with Federal and State statues and guidelines specified by contract authority.</p> <p>Compliance was determined by facility policy and interview with the PREA Coordinator and Chief of Operations.</p>
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115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>KCSD Policy 606 Prison Rape Elimination Act</p> <p>PREA Audit 2014</p> <p>PREA Audit 2017</p> <p>PREA Audit 2020</p> <p>115.401 (a): This is the fourth audit of this facility. The previous audits were conducted in 2014, 2017, 2020 by certified PREA Auditors</p> <p>115.401 (b): This is the second year of this cycle.</p> <p>115.401 (h): During the audit, the auditor was allowed access to all areas of the facility during the official tour and additional visits to different areas of the facility</p>

	<p>while interviewing and observing camera locations.</p> <p>115.401 (i): I requested personnel files, inmate files, training records, investigation files, logbooks, and pertinent forms utilized to conduct the requirement of the audit process. Each document was provided on a timely basis.</p> <p>115.401 (m): I interviewed specialized staff, random staff, random inmates, and targeted inmates during the onsite audit.</p> <p>115.401 (n): Posting were displayed throughout the facility with the name and address of the PREA auditor. The auditor did not receive any correspondence from inmates.</p>
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Per agency policy and standard requirements, KCSD assures me that this final report will be published on their website at to be available to the public. The report from 2014,2017 and 2020 were located on the KCDS website and reviewed and uploaded by the auditor.

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

	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.)	
115.13 (a)	Supervision and monitoring	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into	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
115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

115.14 (a) Youthful inmates		
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (b) Youthful inmates		
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (c) Youthful inmates		
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.15 (a) Limits to cross-gender viewing and searches		
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.15 (b) Limits to cross-gender viewing and searches		
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	na
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the	na

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

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

	with inmates with disabilities including inmates who: Have intellectual disabilities?	
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
115.16 (b)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.16 (c)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
115.17 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who	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
115.17 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes

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

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

	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	na
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	na
115.21 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	na
115.22 (a)	Policies to ensure referrals of allegations for investigations	

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

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

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

	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes
115.33 (d)	Inmate education	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes
115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
115.33 (f)	Inmate education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes
115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (b)	Specialized training: Investigations	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and	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
115.34 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or	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.)	
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective	yes

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

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

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

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

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

	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
115.43 (d) Protective Custody		
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
115.43 (e) Protective Custody		
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.51 (a) Inmate reporting		
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.51 (b) Inmate reporting		
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain	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.)	na
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes

	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.)	yes
115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
115.52 (f)	Exhaustion of administrative remedies	

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	na

	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
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual	yes

	abuse or sexual harassment or retaliation?	
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.61 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes

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

	response to an incident of sexual abuse?	
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of	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
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations	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
115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes

	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	na
115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	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?	
115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.76 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes

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

	evidence sufficient to substantiate the allegation?	
115.78 (g)	Disciplinary sanctions for inmates	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
115.81 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior	yes

	sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	
115.82 (a)	Access to emergency medical and mental health services	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse	

	victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na

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

115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	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?	
115.88 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	

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

(f)		
	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