

# PREA Facility Audit Report: Interim

**Name of Facility:** Ford County Sheriff Office

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** 09/25/2016

**Date Final Report Submitted:** NA

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Lauren Fish	<b>Date of Signature:</b> 09/25/2016

AUDITOR INFORMATION	
<b>Auditor name:</b>	Fish, Lauren
<b>Address:</b>	
<b>Email:</b>	LaurenFish23@hotmail.com
<b>Telephone number:</b>	
<b>Date of facility visit:</b>	2016-08-11

FACILITY INFORMATION	
<b>Facility name:</b>	Ford County Sheriff Office
<b>Facility physical address:</b>	235 N American St, Paxton, Illinois - 60957
<b>Facility mailing address:</b>	
<b>The facility is:</b>	<input checked="" type="radio"/> County <input type="radio"/> Federal <input type="radio"/> Municipal <input type="radio"/> State <input type="radio"/> Military <input type="radio"/> Private for profit <input type="radio"/> Private not for profit
<b>Facility Type:</b>	<input type="radio"/> Prison <input checked="" type="radio"/> Jail

Primary Contact			
<b>Name:</b>	Stacie Bruens	<b>Title:</b>	Lt. Jail Administrator
<b>Email Address:</b>	sbruens@fcsheriff.com	<b>Telephone Number:</b>	2173799482

Warden/Superintendent			
<b>Name:</b>	Stacie Bruens	<b>Title:</b>	Lt. Jail Administrator
<b>Email Address:</b>	sbruens@fcsheriff.com	<b>Telephone Number:</b>	217 379 2324

Facility PREA Compliance Manager			
<b>Name:</b>	Mark Doran	<b>Title:</b>	Sheriff
<b>Email Address:</b>	mdoran@fcsheriff.com	<b>Telephone Number:</b>	217 379 9470

Facility Health Service Administrator			
<b>Name:</b>	Advanced Correctional Healthcare	<b>Title:</b>	Dr Rakestraw
<b>Email Address:</b>		<b>Telephone Number:</b>	3096213288

Facility Characteristics		
<b>Designed facility capacity:</b>	61	
<b>Current population of facility:</b>	19	
<b>Age Range</b>	Adults: 18-80	Youthful Residents: 0
<b>Facility security level/inmate custody levels:</b>	high	
<b>Number of staff assigned to the facility (including current staff and new hires) during the past 12 months:</b>	15	

AGENCY INFORMATION	
<b>Name of agency:</b>	Ford County Sheriff Office
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	235 n american st, paxton, Illinois - 60957
<b>Mailing Address:</b>	
<b>Telephone number:</b>	2173792324

Agency Chief Executive Officer Information:			
<b>Name:</b>	Mark Doran	<b>Title:</b>	Sheriff
<b>Email Address:</b>	mdoran@fcsheriff.com	<b>Telephone Number:</b>	217 379 9740

Agency-Wide PREA Coordinator Information			
Name:	Mark Doran	Title:	Sheriff
Email Address:	mdoran@fcsheriff.com	Telephone Number:	217 379 9470

<b>AUDIT FINDINGS</b>
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**Narrative:**

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

Auditor Lauren Fish was contacted on June 3, 2016 about conducting a PREA audit at the Ford County Jail in Paxton, IL. The Pre-Audit Questionnaire was completed and submitted on the automated system on July 27, 2016. Prior to the onsite visit, PREA auditor communicated regularly with Jail Administrator (JA), Stacie Bruens. The JA sent supplemental documentation to the auditor electronically prior to the onsite visit. Auditor's confidential contact information (PO Box) was provided to the JA for distribution to facility staff and inmates.

Prior to the onsite visit, the auditor reviewed the Pre-Audit Questionnaire and all documentation received. A few items were requested during the onsite visit, and additional information was collected from JA during the post-audit period. A sample of inmate records were reviewed, including booking information, medical and mental health notes, facility policies, contracts, and PREA information disseminated to inmate

The onsite visit took place on August 11, 2016. There were 24 inmates in custody and 7 staff on duty (4 Deputies, Chief Investigator, JA, and Sheriff). The auditor had access to a confidential space to conduct interviews and review documentation. JA led the auditor on a comprehensive tour of the facility. This included the Administrative Area and the secured perimeter. The auditor inspected a sample of inmate cell blocks, isolation rooms, central control room, outdoor recreation area, indoor gym/recreation area, food prep/kitchen, booking room, medical examination area and holding cell, storage room, and multipurpose room (used for staff trainings and inmate religious services). Throughout the tour, the auditor made observations of camera placement and potential blind spots as well as the video monitoring system in the Central Control room. Staff interactions with one another and with inmates were noted, as well as inmate activity in the cell blocks.

PREA auditor interviewed Mark Doran (Ford County Sheriff), JA Bruens, Chief Investigator (Patrick Duffy), 2 Deputies on duty (chosen at random), and 3 inmates (chosen at random) during the onsite visit. The mental health and medical staff were interviewed via phone after the onsite visit, as they were not available to be at the facility on the day of the audit. Mental Health contractor, Janelle Bagley, is a Licensed Professional Clinical Counselor (LPCC). Nurse contractor, Mark Brake, is a Licensed Practical Nurse (LPN).

It is evident that a lot of hard work was done in preparing for the PREA audit and ensuring compliance with the standards. The auditor will work with the facility on corrective action items and provide a Final Audit Report upon completion.

**Facility Characteristics:**

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

The Ford County Sheriff's Office operates the Ford County Jail. This is a county jail housing local county residents and contracts with the Federal Government for the confinement of federal detainees. The facility has the capacity for about 60 inmates, but they average around 25 at any given time. Male and female adult inmates, no juveniles, are incarcerated in the facility. There are 2 floors in the jail—the first floor where inmates are housed and a basement. There are 2 hallways, each with cell blocks holding up to 6 inmates. Male and female inmates are kept on opposite sides of the facility. Within each cell block, there are 3 individual cells, each with bunked beds and a toilet. Each cell block has a common area (day room) with a tv, phone, and table. There is a shower in the corner of the common area (day room) which all inmates in that particular cell block use. Inmates can be in the common area for the majority of the day, and cells are closed at designated hours. Cell checks are conducted every 30 minutes, and staff uses a "pipe recording device" which electronically logs the check into the facility communication software (LEMS System).

There are 2 isolation rooms and a camera in each which is monitored from Central Control. There is an outdoor fenced recreation area and an inside gym with a basketball court and weightlifting equipment. The booking area has an intake space and holding cell along with a place where inmates are seen for medical evaluation and mental health services. There is a visitation room monitored by Central Control.

The food prep/kitchen area is in the basement, and inmates are served meals in their cells. Food is prepared by Aramark contract services, but the individual contractors do not have contact with the inmates at any time. Also in the basement are a storage area and a multipurpose room which is used for staff training, meetings, and inmate religious services.

**Summary of Audit Findings:**

The summary should include the number of standards exceeded, number of standards met, and number of standards not met, along with a list of each of the standards in each category. If relevant, provide a summarized description of the corrective action plan, including deficiencies observed, recommendations made, actions taken by the agency, relevant timelines, and methods used by the auditor to reassess compliance.

<b>Number of standards exceeded:</b>	0
<b>Number of standards met:</b>	38
<b>Number of standards not met:</b>	7

Number of Standards Exceeded--0

Number of Standards Met--35

Number of Standards Not Met--7

Number of Standards Not Applicable--2

Number of Standards Exempt From--1

**Corrective Action Needed:**

The facility must develop and implement a procedure for notifying inmates when opposite gender officers enter the housing units. Since both male and female inmates are housed at the facility, all officers should announce their presence.

The PREA policy must be published on the FCSO website.

Publish the annual report information on FCSO website or demonstrate how to otherwise make available to the public.

In addition to providing inmates with PREA documents, the facility needs to develop a more comprehensive education/training for inmates. This can be accomplished by showing inmates the video "PREA: What you need to know," which is published on the PREA Resource Center website. Inmates will need to acknowledge in writing that they have received all PREA training and education.

Revise the Spanish PREA handouts to include contact information for reporting sexual abuse and sexual harassment.

Implement an objective screening for risk of sexual victimization and abusiveness at intake and upon transfer to a different facility. Complete a reassessment on inmates after 30 days when warranted

Include this process in facility policy

Train staff on how to conduct screening instrument

Include ways to report sexual abuse and sexual harassment on the facility website so that a third party has the opportunity to make a report on an inmate's behalf.

Standards
<b>Auditor Overall Determination Definitions</b>
<ul style="list-style-type: none"> <li>• Exceeds Standard (Substantially exceeds requirement of standard)</li> <li>• Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period)</li> <li>• Does Not Meet Standard (requires corrective actions)</li> </ul>
<b>Auditor Discussion Instructions</b>
<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
<b>Auditor Overall Determination:</b> Meets Standard
<b>Auditor Discussion</b>
<p>The facility has a PREA policy which outlines all necessary components--prevention, detection, and response to sexual abuse and sexual harassment. The Ford County Sheriff's Office operates one facility, the Ford County Jail. The two top administrators have been designated with PREA compliance responsibilities. Sheriff Mark Doran is the PREA Coordinator, and Jail Administrator (JA) Stacie Bruens is the PREA Compliance Manager. Their responsibilities related to PREA are established and included in the facility PREA policy.</p> <p>Policy Corrections "Prison Rape Elimination Act" (PREA)  Table of Organization  Interviews with Jail Administrator and Sheriff</p>

<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The facility contracts with the Federal Government for the confinement of federal detainees. The contract authorizes confinement of adult male and adult female federal detainees from the Bureau of Prisons (BOP), U.S. Marshals Service (USMS), and Immigration and Custom Enforcement (ICE). Contract provisions require the facility's compliance with PREA standards. The facility has entered into no other contracts or contract renewals for the confinement of inmates since August 12, 2012.</p> <p>Policy Corrections PREA: Rape Elimination Act Reporting Information  Interview with Sheriff and JA  Detention Services Intergovernmental Agreement--contract with Federal Government for confinement of federal detainees</p>

<b>115.13</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The facility ensures a staffing plan minimum of 2 Corrections Officers (CO) on duty and 1 CO posted in the Control Room to monitor the video system. The JA designates overtime, when needed, to ensure adequate staffing levels. There have been no deviations to this plan. The facility operates 3 shifts: day, swing, and night. Additional officers are on duty when there is a need to transport inmates or there are jail activities occurring. The staffing plan is based on a population of 61 inmates. However, the average daily headcount is 25 inmates. Rounds are made every 30 minutes, The JA (2nd in command of the facility) conducts regular rounds throughout the week, and there is a Shift Supervisor on duty each of the other shifts.</p> <p>Policy Corrections Jail Operations Manual: Cell Checks/The Pipe Recording Device  Interviews with Random Staff  Samples of round logs  Pre-Audit Questionnaire  Sample staffing plan weekly schedule  Interview with JA  Daily population reports</p>

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This standard is N/A.</p> <p>The facility does not house youthful inmates under 18 years old. The FCSO and USMS contract authorizes adult male and adult female detainees only. Over the past 12 months, there have been no youthful inmates at this facility.</p> <p>Detention Services Intergovernmental Agreement Policy Corrections Custody of Juveniles Interview with JA and Sheriff</p>

<b>115.15</b>	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>Cross gender searches are not permitted at the facility. If an inmate needs to be patted down, and no same sex CO is on duty, the facility will place the inmate in the holding cell and call a CO to come in to perform the search. Upon booking, and as needed, inmates are "dressed out" and searched by a same sex CO in a room with no windows.</p> <p>The facility does not conduct body cavity searches unless approved by an immediate supervisor.</p> <p>There are no cameras in the cell blocks. Therefore, the CO posted in the Control Room is not able to view opposite gender inmates showering, performing bodily functions, and changing clothing. Opposite gender COs only view inmates performing bodily functions or changing clothing when viewing is incidental to routine cell checks.</p> <p>Facility tour and observations Interview with Random Staff, Inmates Policy Corrections Ford County Jail Operations Manual-Strip Searches</p> <p>Corrective action required: The COs do not announce their presence on the unit. The facility must add or develop policy and procedure for announcing when opposite gender COs enter the housing unit.</p>

<b>115.16</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>PREA information is read aloud and explained to any inmate with visual, auditory, or intellectual impairments. PREA information is available in Spanish. The facility utilizes the University of Illinois--Champaign/Urbana for translation services as well as a local Spanish translator used in court.</p> <p>Interview with JA and Sheriff          PREA handouts given to inmates in Inmate Rule Book          Interview with Random Staff          Policy Corrections Communication on Patients' Health Needs</p>

<b>115.17</b>	<b>Hiring and promotion decisions</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The facility does not hire anyone with a previous conviction involving a felony or serious misdemeanor offense. There have been no new employees hired within the past 12 months who have contact with inmates. The facility has 1 volunteer pastor and 3 contract healthcare providers. All volunteers and contractors who have direct contact with inmates have a criminal background check conducted. The FCSO does not have a designated Human Services staff member. The Sheriff and JA are responsible for the hiring, promotion, and firing of employees.</p> <p>Policy Organization Qualifications for Employment--Pre Employment Requirements          Policy Corrections PREA Supervision and Monitoring of Inmates and Staff          Interview with JA and Sheriff</p>



<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The facility added a recreation area outside for the inmates prior to August, 2012. New cameras have been added or replaced, but there have been no major changes to the video monitoring system or electronic surveillance system. Equipment is updated as needed and when resources are available.</p> <p>Observations of Control Room and video surveillance system  Interview with Random Staff  Interview with JA and Sheriff  Facility floor plan  Observations of camera placement during facility tour  Facility tour of outside recreation area addition as well as camera placement and monitoring view in Control Room  Committee meeting notes and communications on building addition project  Schematic of facility and camera location list</p>

<b>115.21</b>	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Inmates who are victims of sexual assault or sexual harassment are transported to CARLE Hospital for treatment by a SAFE/SANE provider. Evidence is collected and submitted according to the Sexual Assault Evidence Submission Act. The facility has formed an MOU with the Community Resource &amp; Counseling Center (CRCC) for victim support and advocate services. The JA has made a documented effort to establish an MOU with RACES (Rape Advocacy, Counseling, and Education Center) for victim advocate support services. In the case of a sexual assault or sexual harassment involving a federal inmate, the facility contacts the USMS or the BOP and works with the in-house investigator.</p> <p>Policy Corrections PREA Inmate Access to Outside Confidential Support Services  Detention Services Intergovernmental Agreement  MOU with CRCC  MOU with CARLE Hospital  Policy Corrections: Evidence Control  Policy Operations: Sexual Assault Evidence Submission Act Notice of Emergency Rules  Documentation of effort to establish MOU with RACES  Interview with JA, mental health contractor, and nurse contractor</p>



<b>115.22</b>	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>There have been no reports or allegations of sexual assault or sexual abuse at the facility within in the past 12 months. Responsibilities of all entities involved with investigations of sexual assault and sexual abuse are documented. Investigations are conducted by in-house Investigative Staff, and the DOJ is contacted when any federal inmate is involved in the incident (victim or abuse). The DOJ has the authority to decide if federal investigators will manage or participate in the investigation.</p> <p>Policy: Operations--Sexual Assault Evidence Submission Act Notice of Emergency Rules--"Responsibilities"</p> <p>Policy: Corrections PREA--Investigation Requirements and Responsibilities</p> <p>Review of Ford County Sheriff website</p> <p>Interview with Sheriff</p> <p>Previous investigation documentation</p> <p>Corrective Action Needed:</p> <p>Publish PREA policy on facility website</p>

<b>115.31</b>	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>All facility staff who have contact with inmates were required to watch 3 videos: "Complying with PREA" (30 minutes), "Cross gender Supervision" (30 minutes), and "Sexual Misconduct" (30 minutes). Employees signed an acknowledgement form that they had completed this training. When policies change or are created, employees review and sign off acknowledging that they have read and understand the policies.</p> <p>Signed acknowledgement of PREA training</p> <p>Signed acknowledgement of PREA policy receipt and understanding</p> <p>Interview with JA and Sheriff</p> <p>Interview with Random Staff</p>

<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The facility contracts with Advanced Correctional Healthcare, Inc. (ACH) for medical and mental health care. There is 1 nurse who works up to 6 hours a week, and 1 mental health provider who works up to 4 hours a week. A physician from ACH comes to the facility monthly but is not frequently in contact with inmates. ACH provides PREA training for medical and mental health providers before they begin working in the facility. The facility has one volunteer pastor who has contact with inmates.</p> <p>ACH PREA training curriculum, "Healthcare Staff Responsibilities for PREA"</p> <p>Interviews with contract mental health and medical provider</p> <p>Interview with JA</p> <p>Policy Corrections PREA Education and Training</p> <p>Signed acknowledgement of PREA training for ACH contractors and volunteer pastor</p>

<b>115.33</b>	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>PREA informational pamphlets are included in the Inmate Rule Book, and inmates receive this upon booking. All current inmates were given updated copies of the rule book which had the PREA information. The information is available in Spanish and can be read aloud to inmates with disabilities. The University of Illinois can be contacted for translation services when needed.</p> <p>Policy Corrections PREA--Education &amp; Training</p> <p>Interviews with Inmates, Random Staff</p> <p>Inmate Rule Book</p> <p>Samples of jail records and intake forms</p> <p>Interview with JA</p> <p>Corrective action needed:</p> <p>Begin showing inmates, "PREA: What you need to know" from PRC website--showing the video in addition to providing the PREA pamphlets will be a more comprehensive education/training for inmates.</p> <p>Include signed acknowledgement on intake forms that inmate received PREA information</p> <p>Add reporting information to PREA handouts in Spanish</p>

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Lt. Patrick Duffy is the in-house Chief Investigation officer and completed specialized training for sexual abuse in a correctional facility.</p> <p>Organization Chart</p> <p>Certificate of completion for "Prison Rape and Sex Assault Investigations Inside Correctional Facilities"</p> <p>Interview with Investigative Staff, JA, and Sheriff</p>

<b>115.35</b>	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The facility has one part-time nurse (~6 hours/week) and one mental health provider (~4 hours/week). One physician provides services to inmates; however, he is there for only a limited amount of time each month. The facility contracts with ACH for these services. All forensic exams are conducted by CARLE Hospital. ACH providers received PREA training prior to employment at the facility. They are required to take a pre and post-test to confirm their understanding of the material. There is one volunteer pastor who provides services to inmates and was verbally informed of the facility's PREA policy.</p> <p>MOU with CARLE Hospital</p> <p>Interviews with mental health provider and nurse</p> <p>Acknowledgement of PREA training for ACH staff and volunteer</p> <p>Contract for provision of services and PREA training with ACH</p> <p>Interview with JA</p> <p>PREA training curriculum from ACH</p>

<b>115.41</b>	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>The facility currently conducts an intake assessment upon booking. There is no designated Intake Staff, but rather, all COs complete the intakes. Currently, the facility conducts an informal assessment of an inmate's risk for sexual victimization or sexual abuse, but no objective screening instrument is used. The facility is aware of the need to implement a formal screening instrument and has begun to identify ways to implement this into the booking process.</p> <p>Corrective action needed:</p> <ul style="list-style-type: none"> <li>Implement an objective screening for risk of sexual victimization and abusiveness at intake and upon transfer to a different facility</li> <li>Complete a reassessment on inmates after 30 days when warranted</li> <li>Include process in facility policy</li> <li>Train staff on how to conduct screening instrument</li> </ul>

<b>115.42</b>	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>When determining cell placement, the facility considers information gathered from initial intake and booking, observations of behavior, knowledge of repeat inmates, relationships to other facility inmates, and physical characteristics. While the facility has not used a formal PREA risk screening tool yet, the staff carefully considers the totality of known and observed information about an inmate before determining housing. The staff's professional experience and judgment are used to make such decisions. The facility has not had any transgender inmates to date but they would be provided the opportunity to shower separately from other inmates.</p> <p>Interviews with random staff and inmates</p> <p>Interview with JA and Sherriff</p> <p>Tour of facility and observations of housing arrangements, showers</p> <p>Sample of inmate intake screening</p> <p>Policy Corrections: Classification of Prisoners</p> <p>Corrective action needed:</p> <ul style="list-style-type: none"> <li>Implement screening for risk of sexual victimization and abusiveness</li> <li>Train staff in how to use screening for housing placement</li> </ul>

<b>115.43</b>	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The facility has an isolation room used for, among other reasons, disciplinary measures. This cell has a camera in it and is monitored constantly by the officer posted in the central control room. Inmates accused of sexual abuse or sexual harassment are separated and moved to a different cell from other inmates pending the investigation outcome. Information is documented and reviewed. Inmates who are potential victims of sexual abuse would be separated from other inmates, but not placed in isolation.</p> <p>Policy Corrections PREA: Protection of Inmates from Contact with Alleged Abusers  Interview with JA and Sherriff  Observations during facility tour  Policy Corrections PREA: Classification of Prisoners</p>

<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Inmates can report allegations of sexual abuse and sexual harassment both verbally and in writing and can do so anonymously. Inmates can report to any facility Staff, JA, and/or Sheriff by submitting an Inmate Request/Complaint Form. Inmates can contact outside agency CRCC and/or the FOB, DOJ.</p> <p>Inmate Request/Complaint Form  Interview with Random Staff and Inmates  Interview with JA and Sheriff  PREA information in Inmate Rule Book  Policy Corrections PREA: Inmate Access to Outside Confidential Support Services</p>

<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	The agency is exempt from this standard

<b>115.53</b>	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Inmates have access to outside confidential support services. There are telephones within each cell block that can be used in a confidential manner.</p> <p>MOU with CRCC for mental health services  Documentation of efforts to establish MOU with RACES for support services  Policy Corrections PREA: Inmate Access to Outside Confidential Support Services  PREA information included in inmate handbook</p>

<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>Policy Corrections PREA: Duty to Report Alleged Sexual Abuse and/or Sexual Harassment-- 3rd Party Reporting</p> <p>Corrective action needed:  Publish information on how to make a 3rd party report of sexual abuse or sexual harassment on behalf of an inmate on facility website</p>

<b>115.61</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>There have been 0 reports of sexual abuse or sexual harassment in the past 12 months. Facility staff are required to report all allegations immediately to the Jail Administrator and/or the Sheriff. Mental Health and Medical staff are required to report immediately to JA and/or Sheriff.</p> <p>ACH training curriculum: Reporting Services  Policy Corrections: PREA Duty to Report Alleged Sexual Abuse and/or Sexual Harassment  Interview with random staff, mental health provider, and nurse  Interview with JA and Sherriff</p>

<b>115.62</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The expectation is that immediate action is required at any time staff learns of an inmate who is at substantial risk of imminent sexual abuse. The inmate is immediately removed from the area and separated from the alleged abuser.</p> <p>Interview with Random Staff, JA, and Sherriff</p> <p>Policy Corrections: PREA Investigation Requirements &amp; Responsibilities</p>

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>In the past 12 months, there have been 0 instances of sexual abuse allegations reported at another facility. The JA or Sheriff is responsible for contacting the administrator at another facility if allegations are made. All staff are required to report any reports received from another facility of sexual abuse that occurred within the Ford County Jail.</p> <p>Policy Corrections: PREA Investigation Requirements &amp; Responsibilities</p> <p>Interview with Sheriff &amp; JA</p>

<b>115.64</b>	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>All staff are in the position of potential first responder. All staff at the facility are considered security staff and are expected to respond accordingly. Staff are aware of their responsibilities as a first responder, and the policy is specific in spelling out these duties.</p> <p>Policy Corrections PREA FCSO Staff Member First Responder Responsibilities</p> <p>ACH PREA training curriculum</p> <p>Interviews with Random Staff, JA and Sheriff</p> <p>Acknowledgement of PREA training from ACH staff and FCSO staff</p>



<b>115.65</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The institutional plan is contained within the facility PREA policy. ACH contract includes the institutional plan and requires all contractors understand FCSO policy and procedures.</p> <p>Policy Corrections PREA Investigation Requirements &amp; Responsibilities  Federal Sexual Assault Reporting Regulations  ACH Contract for Services  Interview with random staff, JA and Sheriff</p>

<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Labor Agreement--FCSO and IL Fraternal Order of Police (FOB) Labor Council--Article 9 "Discipline"</p>

<b>115.67</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Staff members accused of sexual abuse or sexual harassment are placed upon administrative leave until the investigation concludes. If the staff member returns to the facility after the investigation has concluded, he/she is not permitted to be alone with the inmate accuser. Staff members are required to report any retaliation against inmates to the JA and/or Sheriff. Inmates are protected against retaliation by separating the alleged victim and abuser into separate cell blocks. The JA and Shift Supervisors are designated with monitoring retaliation. Emotional and community support services are available to the victim at CRCC.</p> <p>Interviews with JA and Sheriff  Policy Corrections PREA Protection of Inmates from Contact With Alleged Abusers and FCSO Staff Members Reporting Required  MOU with CRCC  Interview with inmates  Observations made on facility tour  Interview with Random staff and Investigative staff</p>



<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>There have been no reports or allegations of sexual abuse or sexual assault at the facility in the past 12 months. As such, the use of segregated housing to protect an inmate victim has not occurred. Policy indicates that victims of alleged sexual abuse are placed into segregated custody and monitored every 15 minutes until mental health staff can perform an evaluation. Medical and mental health protocols are followed thereafter.</p> <p>Policy Corrections PREA Post-Allegation Protective Custody Interview with Random Staff, JA, and Sheriff</p>

<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The FCSO has a designated Chief Investigator who received specialized training for investigative sexual abuse within correctional facilities. Investigative findings are presented to the JA and Sheriff. Substantiated cases of sexual abuse and sexual assault are referred to the State Prosecutor's office for possible criminal charges. An investigation continues even if the accused staff member has been terminated or resigned before the investigation concludes. If Federal investigative parties are included in the process, there is ongoing communication and collaboration with the FCSO throughout the process. All investigative processes are documented and physical evidence is submitted to a forensic laboratory.</p> <p>Policy Operations Sexual Assault Evidence Submission Act Interview with Investigative Staff Interview with JA and Sheriff Policy PREA Investigation Requirements and Responsibilities and Disciplinary Sanctions Older reports and administrative investigations</p>

<b>115.72</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Policy Corrections PREA Disciplinary Sanctions Interview with investigative staff</p>

<b>115.73</b>	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Inmates who are victims of sexual abuse or sexual harassment are notified of the investigation outcome. There have been no reports or allegations of such incidents in the past 12 months.
	Policy Corrections PREA Investigation Requirements and Responsibilities Interview with JA and Investigative Staff

<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Facility staff that are accused of sexual abuse or sexual harassment are placed on Administrative Leave pending the outcome of the investigation. The sheriff has the authority to impose discipline under the Fraternal Order of Police (FOP) contract. Unfounded criminal investigations are cause for an administrative review of policies and procedures by the sheriff. If the allegations are found to be unsubstantiated, the sheriff determines corrective actions through a disciplinary hearing. Employees are notified of disciplinary actions imposed and basis for the discipline. Substantiated criminal investigations are forwarded for prosecution.
	Labor Agreement between FCSO and IL FOP: Article 9--Discipline Interview with Investigative Staff Interview with Sheriff Policy Corrections PREA Disciplinary Sanctions. Older notifications to employee of paid administrative leave pending investigation Older notification to employee of termination of employment

<b>115.77</b>	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination: Meets Standard</b>
	<b>Auditor Discussion</b>
	<p>The facility has one volunteer who provides religious services to inmates and 2 contract health providers from ACH. Volunteers and contractors who have been accused of sexual abuse or sexual harassment are not permitted to enter the facility until an investigation is completed. If substantiated, the volunteer is banned from entering, and the case is forwarded for prosecution. Substantiated allegations of abuse by an ACH contractor are reported to ACH and medical/mental health licensing bodies.</p> <p>Policy Corrections PREA Volunteer/Contractor/Visitor Discipline  Interview with JA and Investigative Staff  Pre-Audit Questionnaire  State of IL Dept. of Financial and Professional Regulation  Licensed Practical Nurse (LPN)  Licensed Clinical Professional Counselor (LPCC)</p>

<b>115.78</b>	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination: Meets Standard</b>
	<b>Auditor Discussion</b>
	<p>Inmates are given notice and have a disciplinary hearing when an incident report is written. Major violations penalties range from loss of one or more privileges to additional criminal charges filed. Minor violations can result in temporary loss of a privilege, loss of good time on a sentence, or segregation/isolation. Miscellaneous violation penalties are imposed by the Disciplinary Officer and reviewed by the JA. Inmates are permitted to request Sheriff review of action. Sexual abuse or sexual harassment are considered major violations and are subject to the IL Criminal Code for additional charges.</p> <p>Inmate Handbook  Interview with Random Staff and Inmates  Interview with JA and Sheriff</p>

<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Medical and mental health practitioners obtained informed consent and document in clinical notes. Medical information is kept locked, and security staff are notified only of pertinent information needed to effectively perform their job duties. There have been no reports of sexual abuse or sexual harassment in the past 12 months.</p> <p>ACH PREA Training curriculum  Interviews with nurse and mental health provider  Observations made on facility tour  Interviews with JA and Random Staff  Medical license for medical contractors  License Professional Clinical Counselor for mental health contractor</p>

<b>115.82</b>	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The FCSO is responsible for all medical costs inside the facility, and the Federal Government is financially responsible for all medical services outside the facility for federal detainees. Outside medical care does not need to be pre-approved by the Federal Government in the case of an emergency. Inmates who are victims of sexual assault or sexual harassment are treated at CARLE Hospital, and the facility follows all recommended care. In the event that mental health or medical providers are not at the facility, the FCSO staff act as first responders and facilitate transfer of the victim to CARLE hospital.</p> <p>Policy Corrections PREA: FCSO Staff Member First Responder Responsibilities  Detention Services Intergovernmental Agreement--Medical Services  MOU with CARLE Hospital and CRCC  Interview with nurse and mental health provider  ACH PREA Training Curriculum</p>

<b>115.83</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Inmates are offered medical care at CARLE Hospital and mental health care at CRCC. In-house mental health and medical provider can provide follow up support as well. Pregnancy tests are offered to inmate victims at the hospital. Medical and mental health services are documented on clinical notes and medical progress notes which are kept in medical files.</p> <p>Detention Services Intergovernmental Agreement--Medical  Sample inmate medical records and clinical notes  MOU with CARLE Hospital and CRCC  Documented effort to form MOU with RACES (rape advocacy services)  Interview with nurse and mental health provider  Policy Corrections PREA: Inmate Access to Outside Confidential Support Services  Information in Inmate Rule Book  Interviews with Sherriff and JA  ACH PREA Training Curriculum</p>

<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Sheriff and JA review all incidents of sexual abuse or sexual harassment, regardless of the investigation outcome. Shift Supervisors and investigative staff provide input and are involved in the review process. A review of the policy, training, procedures, and staffing plan would be conducted and any formal changes communicated to staff. The facility has a Continuous Quality Improvement process for healthcare systems and services. This entails a review of practices, records, and corrective action. The team is comprised of the contract physician, nurse, mental health provider, and facility administrator.</p> <p>Administrative investigations from 2010 and 2014  Policy Corrections PREA: Investigation Requirements and Responsibilities  Interview with JA and Sheriff  Policy Corrections Continuous Quality Improvement Program</p>

<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The FCSO operates only the county jail and aggregates all sexual abuse incident data necessary to complete the Survey of Sexual Violence. All reports, communications and reviews are retained. The facility notifies the DOJ of all sexual abuse incidents; however, the DOJ has not requested aggregated incident-based data from the facility for the previous year. There have been no incidents of sexual abuse or sexual assault within the past 12 months.</p> <p>Policy Corrections PREA Interview with JA and Sheriff Detention Services Intergovernmental Agreement--Special Notifications</p>

<b>115.88</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>Corrective action needed: Publish annual report information on FCSO website or demonstrate how to otherwise make available to the public.</p>

<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>All data is kept secured and confidential. This is the first PREA audit conducted at the facility. The facility will post a copy of the final PREA report on its website and will continue to do so hereinafter.</p>

<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The auditor was afforded access to all areas of the facility and documents in all formats, as requested. During the site visit, the auditor had access to a private room where inmates and staff could be interviewed confidentially. The JA distributed a letter to inmates and staff informing them of the upcoming PREA audit, along with PREA auditor contact information where confidential mail could be sent.</p> <p>Correspondence from JA to inmates and staff  Observations during facility tour  Site visit and interviews with facility inmates and staff  Electronic and paper copies of documents</p>

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This standard is not applicable as this is a single facility, and this is the first PREA audit conducted.</p>



## 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 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 OR the response to 115.12(a)-1 is "NO".)	yes

115.13 (a)	Supervision and monitoring	
	Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	Does the agency ensure that each facility has documented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the generally accepted detention and correctional practices in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any judicial findings of inadequacy in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from Federal investigative agencies in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from internal or external oversight bodies in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration all components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated) in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the composition of the inmate population in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into	yes

	consideration the number and placement of supervisory staff in calculating adequate staffing levels and determining the need for video monitoring?	
	Does the agency ensure that each facility's staffing plan takes into consideration the institution programs occurring on a particular shift in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any applicable State or local laws, regulations, or standards in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the prevalence of substantiated and unsubstantiated incidents of sexual abuse in calculating adequate staffing levels and determining the need for video monitoring?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration any other relevant factors in calculating adequate staffing levels and determining the need for video monitoring ?	yes

<b>115.13 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na

<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes

<b>115.13 (d)</b>	<b>Supervision and monitoring</b>	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

<b>115.14 (a)</b>	<b>Youthful inmates</b>	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na

<b>115.14 (b)</b>	<b>Youthful inmates</b>	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na

<b>115.14 (c)</b>	<b>Youthful inmates</b>	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na

<b>115.15 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes

<b>115.15 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates in non-exigent circumstances? (N/A here for facilities with less than 50 inmates before August 20,2017.)	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 here for facilities with less than 50 inmates before August 20,2017.)	na

<b>115.15 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates?	yes

<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility implement a policy and practice 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?	no

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

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

<b>115.16 (a)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all	yes

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



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

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 may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes

115.17 (b)	Hiring and promotion decisions	
	Does the agency 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?	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?	no

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

<b>115.17 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes

<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes

<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na

<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	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.)	na
	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?	yes
	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 entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes

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 attempts to make a victim advocate from a rape crisis center available to victims per 115.21(d) above.)	na